

## Diebold Nixdorf (“DN”) Tax Strategy for the UK

### Introduction

Diebold Nixdorf, Inc., provides services, software and technology to enable millions of transactions each day. The company’s “Connected Commerce” strategy seeks to continually enhance the customer’s experience at banking or retail locations by integrating services, software, and systems. Diebold Nixdorf is committed to conducting its business according to the highest governance and ethical standards. For more than 150 years, this commitment has been at the very heart of Diebold Nixdorf, defining who we are wherever we transact business around the world.

The foundation of our corporate governance principles and practices are built on our reputation for openness, integrity and accountability. These are the principles that guide Diebold Nixdorf and they are reflected in our ongoing commitment to sound corporate governance practices.

### Tax planning

We are committed to providing transparent information to tax administrations. In DN, we see the strict compliance with the legal framework set by tax legislators on a global basis as our primary aim.

In applying our tax strategy we aim also to be compliant with recognised International Standards by applying Transfer Pricing policies which meet the arm’s length standard. This approach is consistent across the DN group companies.

It is our primary objective to act in accordance with the respective tax laws in the countries where we operate, and as such we are committed to complying with our tax obligations and maintaining good relationships with Global Tax Authorities including HM Revenue & Customs (“HMRC”) in the UK. To do this we only engage in reasonable tax planning that is aligned with our commercial, economic and reputational goals and which at the same time are within the country tax laws as understood at the time.

### Tax risk management and Governance

Within DN, Tax is managed through the Vice President of Tax and Treasury and the Global Corporate Tax team. The Vice President of Tax and Treasury reports directly to the Chief Financial Officer of DN. In the UK, Tax is managed on a day to day basis by the Finance team with support of the Regional and Global Tax Team.

Within the UK, DN operates through Diebold Nixdorf UK (“DN UK”). Our appetite for tax risk is low and we structure our affairs to be based on sound commercial principles and in accordance with relevant tax legislation. Where appropriate, external advice is sought to resolve any uncertainty in operating in accordance with UK Tax legislation.

In DN understanding, UK Taxation covers taxes and duties in the UK related to the following:

- All Corporate Income Taxes
- Indirect Taxes (including VAT, Stamp Duty Land Tax)
- Employment Taxes
- Other Applicable Taxes (Duties, etc.)

Processes related to each type of tax are defined and given to appropriately trained employees. Controls over those processes are regularly checked and enforced using our SOX audit process and Internal Audit. From time to time specialist tax advice is brought in to improve, reinforce, or carry out appropriate tax compliance activities. DN uses a risk-based approach to process control and our approach to testing and controlling processes are set within this framework. In addition, in 2017 DN UK will fall under the Senior Accounting Officer (“SAO”) certification regime for the first time. As part of this the tax processes will be reviewed annually in order to provide assurance for the certification.

The Group utilises tax reliefs and allowances available in the manner in which intended by HMRC and statute. There will, however, be circumstances where the Law may not be clearly defined, or where alternative approaches may result in differing tax outcomes. DN will use its best judgment in determining the appropriate course of action, using available reliefs and incentives where possible, liaising with professional advisors and HMRC where appropriate.

### **Attitude to risk**

Our attitude to risk is set out within our Code of Business Ethics as follows:

*Many governments have enacted unique laws, rules and regulations governing how organizations conduct business with them. It is Diebold Nixdorf's policy to comply with these requirements and to strictly adhere to all terms and conditions of any government contract.*

DN is committed to lawful as well as ethically and socially responsible conduct worldwide. For DN, responsible and lawful conduct is a prerequisite for quality business success and sustainable corporate development. The Board of Directors therefore regards compliance as a fundamental management task and has pledged in its compliance statement to respect the law, while expressly acknowledging the need for lawful, social and ethical conduct. This aim underpins our attitude to tax risks.

### **Working with HMRC**

It is the aim of DN UK to be transparent and proactive in all interactions with HMRC. We will work collaboratively wherever possible with fiscal authorities to resolve disputes and to achieve early agreement and certainty and we seek to work with HMRC so that errors are disclosed as soon as reasonably practicable after they have been identified.