

CARDTRONICS, INC.
WHISTLEBLOWER POLICY
APPROVED BY THE AUDIT COMMITTEE ON DECEMBER 30, 2009

Cardtronics, Inc. (“Cardtronics” or the “Company”) maintains a Code of Business Conduct and Ethics (the “Code”) that requires the Company’s directors, officers and employees to adhere to the highest standards of business and personal ethics in the conduct of their duties and responsibilities. This Whistleblower Policy (the “Policy”) governs the actions of such persons as it relates to violations or perceived violations of such Code. Accordingly, reference should be made to the Company’s Code when reading this Policy.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations of such Code in accordance with this Policy. Any person who in good faith discloses a violation or potential violation under this Policy is protected from any retaliation by the Company. Acting in good faith means that the person making the disclosure believes the violation to be true and accurate, and that the disclosure has not been made for either personal gain or any ulterior motive.

No person who, in good faith, reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequences. Additionally, any person who retaliates against a person who has reported a violation in good faith is subject to their own discipline by the Company, up to and including the termination of their employment. This Policy is intended to encourage and enable employees and others to raise serious concerns within the Company rather than seeking resolution outside the Company.

Reporting Violations

The Code addresses the Company’s policy for reporting violations and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s direct supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his or her supervisor, or if he or she is not satisfied with the supervisor’s response, such employee is encouraged to speak with someone in the Human Resources department, or anyone in management with whom they are comfortable approaching. Supervisors and managers are required to report suspected violations of the Code to the Company’s executive officers, including the Company’s Chief Executive Officer, Chief Financial Officer, or General Counsel, as applicable. In turn, such executive officers are required to report all suspected violations of the Code to the Chairman of the Company’s Audit Committee of the Board of Directors. The Company’s Audit Committee has specific and exclusive responsibility to investigate all reported violations.

For suspected fraud, accounting and auditing, or securities law violations, or when an employee is not satisfied or comfortable with the above stated escalation policy, employees should report violations to the Company’s Audit Committee directly through an anonymous whistleblower hotline. The hotline number is **1-800-963-5731**, and can be

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reached 24 hours a day, seven days a week. Additionally, employees can access the hotline online at www.ethicspoint.com. Employees located in the United Kingdom should first dial **0800-89-0011** before dialing the above number, and employees located in Mexico should first dial **01-880-288-2872**.

Confidentiality

The Company will treat all disclosures by reporting persons as confidential and privileged to the fullest extent permitted by law. If such confidentiality results in the inability to conduct a fair investigation or law requires disclosure, the person making the disclosure will be informed in advance of being identified with the disclosure.

Unsubstantiated Allegations

If a person reports a potential violation in good faith pursuant to this Policy, and the violation is ultimately not confirmed by a subsequent investigation, no action will be taken against the reporting person. In submitting reported violations, persons should exercise due care to ensure the accuracy of the information reported. If, after a thorough investigation, it is determined that a reported violation is without substance, was made for malicious or frivolous reasons, or was otherwise submitted in bad faith, the person reporting such violation could be subject to their own disciplinary action, up to and including the termination of their employment.

Where alleged facts reported pursuant to this Policy are found to be without merit or unsubstantiated, (1) the conclusions of the investigation will be made known to both the person making the report, unless such person submitted the complaint on an anonymous basis, and, if appropriate, to the persons against whom any allegation was made in the complaint, and (2) the allegations will be dismissed, except to the extent necessary to document the conclusion of the investigation and any documentation relating to the reporting person's personnel file.

Reporting and Annual Review

The Chief Executive Officer, together with the Chairman of the Audit Committee, will submit periodic reports to the Audit Committee of all complaints and any remedial actions taken in connection therewith. This Policy will be reviewed annually by the Audit Committee, taking into account the effectiveness of this Policy in promoting the reporting of all Code violations of the Company, but with a view to minimizing the submission of improper complaints and resulting investigations.