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Anti-Bribery and Corruption Policy

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1. Introduction

Cash Converters International Limited (**Cash Converters**) is committed to preventing and countering bribery and corruption in all forms. Cash Converters seeks to take all reasonable steps to minimise the bribery and corruption risks associated with carrying on its business by managing risk and complying with relevant anti-bribery and corruption legislation.

Cash Converters has zero tolerance for unacceptable behaviour in relation to bribery and corruption in its day-to-day operations and business dealings.

2. Scope of the Policy

This policy applies to anyone who is employed by or works for or with Cash Converters, including:

- all officers (senior managers and directors of Cash Converters);
- all employees (whether permanent, fixed term or temporary); and
- dealings with contractors, franchisees, consultants, secondees and third parties on Cash Converters business.

This policy applies globally. If travelling outside of Australia, Cash Converters employees are subject to the laws of the country they visit or travel to, however, the principles of this policy must be followed regardless of whether that country has specific bribery and corruption laws.

Employees are responsible for reading and understanding how this policy applies to them and their role.

3. What is Bribery and Corruption

Employees are prohibited from being involved in bribery and corruption in any form.

Bribery is the dishonest or corrupt offering, promising, giving, accepting or soliciting of benefits (of any kind, whether monetary or not), as an inducement or reward for doing or not doing something which is intended to influence or show favour or disfavour to another person or company.

Bribery can take many forms including:

- cash or cash equivalents (e.g. gift vouchers or loans);
- gifts, entertainment, hospitality or travel;
- donations;
- secret commissions or “kickbacks”;
- uncompensated use, or use on non-arm's length terms, of Cash Converters services, facilities or property;
- “favours” provided to public or government officials or key employees or family members of business partners; or
- anything else that is of value to the recipient.

Corruption is the abuse of a position of trust for personal gain or advantage. Offences of bribery include bribes to a public official (such as a Government Minister) or an employee or agent of Cash Converters.

Requirements:

1. Employees must not engage in corrupt conduct, or give, offer, promise, accept, request or authorise a bribe, and must not cause a bribe to be offered, promised or given, whether directly or indirectly.
2. Any employee who identifies or is aware of corrupt conduct or a bribe by another employee, must immediately report the matter in accordance with section 6.

Facilitation payments, secret commissions and money laundering

Facilitation payments are generally payments to expedite or secure the performance of a routine government action by a government official or employee e.g. processing papers, issuing permits, licences or other official documents, expedite custom clearances or entry or exit visas.

Facilitation payments, whether legal or not in a country, are prohibited under this policy.

Secret commissions involve the dishonest or corrupt giving of a benefit to or receipt of a benefit from another person as an inducement or reward for proving a favour, or for a favour already provided.

Secret commissions occur when a person or entity (such as an employee of Cash Converters) offers or gives a commission to an agent or representative of another person (such as a supplier to Cash Converters).

Money laundering is receiving, possessing, concealing, disposing of or importing money if the money is the proceeds of crime (or there is a risk that the money will become an instrument of crime).

Requirements:

1. Employees must not or cause another to make facilitation payments, secret commissions or be involved in money laundering.
2. Any employee who identifies or is aware of facilitation payments, secret commissions or money laundering by another employee, must immediately report the matter in accordance with **Section 6**.

4. Mitigating and Managing Bribery and Corruption Risks

This policy is supported by a collection of detailed internal policies and procedures. These policies and procedures include aspects designed to manage, mitigate and prevent bribery and corruption risks with respect to (this is not an exhaustive list):

- business partners (third parties);
- corporate activity - mergers, acquisitions and joint ventures;
- customers and transactions;
- donations;
- employment practices;
- gifts, entertainment or hospitality;
- products and projects;
- public officials; and

- record keeping.

Examples of Cash Converters standards, policies and procedures for managing and mitigating bribery and corruption risks are detailed in **Annexure A**.

5. Your Responsibilities

All Company employees are expected to read, understand and comply with this policy. All employees are requested to remain vigilant about the subject matter of this policy and report any breaches, unusual or suspicious activity.

In accordance with section 6 of this policy, you must notify or raise concerns as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

Bribery and corruption are very serious matters.

Employees who breach this policy may face a number of outcomes including disciplinary action, which could result in dismissal for cause. Civil or criminal proceedings could also arise.

6. How to raise a concern

All employees are encouraged to raise concerns or suspicions about any bribery or corruption practice or conduct involving Cash Converters business, at the earliest possible stage. This includes behaviour that makes any employee feel threatened, intimidated or under pressure to engage or be part of any improper conduct.

Reports should be made to:

- Your Department Manager, or
- A Senior Compliance Officer; or
- The Head of People and Culture, or
- Any Executive.

or, if not comfortable with the above reporting options, a report can be made in accordance with the Cash Converters Whistleblower Policy.

7. Reporting and review

The Governance, Remuneration and Nomination Committee will be informed of any material breaches of this policy.

This policy will be regularly monitored and reviewed so that it remains effective and appropriate for Cash Converters.

8. Further Support

For policy queries:

- Store team members – contact your line Manager first, then State Operations or Loss Prevention & Safety Manager.
- All other team members – contact your Department Manager.

Annexure A

Examples of mitigating and managing bribery and corruption risks

BUSINESS AREA	STANDARDS, POLICIES, AND PROCEDURES
Business partners (third parties)	<p>Business partners are third parties who do business with Cash Converters or interact with others on Cash Converters behalf. They include franchisees, joint venture partners, agents, brokers, intermediaries, consultants, representatives and advisers.</p> <p>Appropriate due diligence enquiries and checks must be made when sourcing, selecting and engaging new business partners and suppliers, particularly on important and/or material projects. Business partners must be reputable, qualified and competent. Arrangements with business partners must comply with all applicable laws and the terms of compensation or payment must be on reasonable commercial terms and be appropriately documented.</p>
Corporate activity-Mergers, acquisitions, joint ventures	<p>Where corporate activity including but not limited to a merger, acquisition, joint venture or other arrangement is proposed, appropriate due diligence with respect to bribery and corruption risk must be undertaken as part of due diligence enquiries and investigations.</p> <p>Contracts relating to any ongoing arrangement such as a joint venture, licence, alliance or partnership, must include suitable anti-bribery and corruption clauses with audit rights, in addition to the requirement to comply with this policy.</p>
Customers and transactions	<p>Cash Converters customers and transactions are subject to a number of internal control systems which set out identification, transaction assessment and ongoing customer due diligence processes. These processes assist Cash Converters in identifying any unusual or suspicious transactions, behaviours and high-risk matters and to report such matters when appropriate.</p>
Donations	<p><i>Charitable donations</i></p> <p>In some countries, charities can be used as a screen for illegal bribes. Accordingly, care must be taken to ensure any donation to a charity or cause is legitimate.</p> <p>Cash Converters only makes charitable donations that are legal and ethical under local laws and practices. No corporate donation may be offered or made on behalf of Cash Converters without the prior approval of the full Board.</p> <p><i>Political donations</i></p> <p>All dealings with politicians and government officials which relate to Cash Converters and its business activities must be independent and conducted at arm's length on a commercial and professional basis, to avoid any perception of attempting to gain any unusual or illicit advantage, benefit or gain.</p> <p>Cash Converters may make political donations to political parties from time to time. Any political donations must be authorised by the full Board, disclosed as required by law and recorded in Cash Converters financial statements. Political donations must not be made at business unit or divisional level.</p>
Employment practices	<p>Employment practices and controls currently implemented within Cash Converters include:</p> <ul style="list-style-type: none"> • Appropriate due diligence and pre-employment checks and screening; • Assessment of conflicts of interests; and

	<ul style="list-style-type: none"> • Police clearances.
Gifts, entertainment and hospitality	<p>Gifts, entertainment and hospitality relates to the provision or the receipt or offer of gifts, meals, tokens of appreciation of gratitude, or invitations to events or functions</p> <ol style="list-style-type: none"> 1. Employees must only offer or accept any gifts, entertainment or hospitality if permitted under Cash Converters Gifts and Benefits Policy. 2. Where permitted, all employees must appropriately declare and report gifts and/or benefits, either offered or accepted or valued in accordance with the relevant limits, restrictions and conditions contained in the Gifts and Benefits Policy.
Public officials	<p>In general terms, a public official includes anyone, whether elected or appointed, holding a legislative or judicial office in any country Cash Converters does business, any person exercising a public function in such country, including in a public agency or public enterprise and any official or agent of a public international organisation</p> <ol style="list-style-type: none"> 1. No gifts should be made, offered or promised to any public official. 2. Approval must be obtained from your Department Manager, Senior Compliance Officer or Executive prior to offering any entertainment/hospitality to a public official (except for common courtesies such as modest refreshment in connection with a legitimate business meeting).
Record keeping	<p>Cash Converters maintains appropriate records for all accounts, invoices and relevant documents and ensure such records are protected from misuse.</p> <p>All expenditures by employees, including on gifts, entertainment and hospitality are included in expense reports and approved in accordance with the relevant policies and procedures.</p>