

# ANTI-BRIBERY AND CORRUPTION POLICY

Date: 7 November 2024

## 1. Introduction

- 1.1. 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.
- 1.2. There is legislation in many countries, including, but not limited to, Australia (the Criminal Code Act 1995 (Cth)), the United Kingdom (the Bribery Act 2010), and New Zealand (the Crime Act 1961). Any act of bribery and corruption committed overseas may well result in a prosecution at home and in other jurisdictions.
- 1.3. Cash Converters has zero tolerance for unacceptable behaviour in relation to bribery and corruption in its day-to-day operations and business dealings. A breach of anti-bribery or anti-corruption laws is a serious offence that can severely damage Cash Converter's reputation and result in criminal and civil penalties. Any breach of this Policy that involves a Public Official or Foreign Public Official could also become subject to an investigation by an anti-corruption commission.

## 2. Scope of the Policy

- 2.1. 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.

- 2.2. This policy applies globally. If travelling outside of your normal country of residency, 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.
- 2.3. Employees are responsible for reading and understanding how this policy applies to them and their role. Employees must cooperate fully and openly with any investigation conducted by Cash Converters into alleged or suspected corruption or fraudulent activity or breach of this policy. Failure to cooperate or to provide truthful information is a breach of this policy.
- 2.4. The Company will appoint an Anti-bribery Officer (Chief Risk Officer) who will be responsible for implementing, and communicating to relevant personnel, this policy and monitoring the effectiveness of the policy.

### 3. What is Bribery and Corruption

- 3.1. Employees are prohibited from being involved in bribery and corruption in any form.
  - a) 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.
  - b) 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.

**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. The relevant laws apply to bribery of public officials as well as bribery in respect of any commercial transaction in the private sector.

Bribery can take many forms including:

- cash or cash equivalents (e.g. gift vouchers or loans);
- non-cash gifts, entertainment, hospitality or travel, business or employment opportunities;
- donations or charitable contributions;
- 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.

- 3.2. Employees must not or cause another to make facilitation payments, secret commissions or be involved in 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).

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**.

- 3.3. Employees must not engage in foreign bribery, including providing or offering a benefit to a foreign public official, or causing a benefit to be provided or offered to a foreign public official, where the benefit is not a legitimately due.

The benefit must be intended to influence a foreign public official in the exercise of their official duties for the purpose of obtaining or retaining business or a business advantage which is not legitimately due. The benefit constituting a bribe can come in many forms including:

- cash payments
- extravagant gifts
- holidays
- employment for friends or relatives
- school fees paid for friends or relatives.

There are two broad circumstances in which the offence may apply. First, the conduct constituting the offence occurs wholly or partly in Australia and second, the conduct occurs wholly outside of Australia and the alleged offence is committed by an Australian citizen, resident or corporate entity. In addition to the Australian legislation, Australian citizens and companies engaged in international business transactions may be subject to domestic

offences in the foreign country with whom they are dealing or subject to foreign countries' foreign bribery legislation.

*Foreign bribery is an offence under Australian legislation for both individuals and bodies corporate. If convicted, individuals face up to 10 years imprisonment*

**A foreign public official** is broadly defined in the Australian Criminal Code and includes, but is not limited to, contractors of a foreign government body, members of the military or police force, the executive, judiciary or legislature, or an individual who holds themselves out to be an authorised intermediary of a foreign public official.

## 4. Mitigating and Managing Bribery and Corruption

4.1. 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 and sponsorships;
- employment practices;
- gifts, entertainment or hospitality;
- products and projects;
- public officials, whether foreign or domestic; 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

- 5.1. All Company employees are expected to read, understand and comply with this policy.
- 5.2. 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.

- 5.3. 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

- 6.1. 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.

- 6.2. Reports should be made to:

- Your Department Manager, or
- A Senior Compliance Officer; or
- The Head of People and Culture; or
- The Anti-bribery Officer (Chief Risk Officer); 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.

- 6.3. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers detrimental treatment as a result of refusing to engage in conduct that may constitute bribery or other conduct prohibited under this policy or raises a genuine concern in respect of any such conduct.
- 6.4. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Personnel who are subjected to such treatment should inform the Anti-bribery Officer immediately. If the matter is not remedied, they should raise it formally in accordance with the Company's Whistleblower Policy.

## 7. Reporting and review

- 7.1. The Governance, Remuneration and Nomination Committee will be informed of any material breaches of this policy and will report to the CCIL Board.
- 7.2. The owner of this policy is the Anti-bribery officer (Chief Risk Officer) assisted by the Company Secretary. This policy will be regularly monitored and reviewed so that it remains effective and appropriate for Cash Converters.
- 7.3. The Policy cannot be amended without approval from the CCIL Board.

## 8. Further Support

- 8.1. For policy queries:
- Operational Assurance Manager.
  - All other team members – contact your Department Manager.
  - The Anti-bribery Officer – Chief Risk Officer.

## Annexure A

Examples of mitigating and managing bribery and corruption risks

Business Area	Standards, Policies and Procedures
<p><b>Business partners (third parties)</b></p>	<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. 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>
<p><b>Corporate activity-Mergers, acquisitions, joint ventures</b></p>	<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>
<p><b>Customers and transactions</b></p>	<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>
<p><b>Donations and sponsorships</b></p>	<p><b>Charitable donations and sponsorships</b></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 and sponsorships that are legal and ethical under local laws and practices. No corporate donation or sponsorship may be offered or made on behalf of Cash Converters without the prior approval of the full Board.</p> <p><b>Political donations</b></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</p>



	<p>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>
<b>Employment practices</b>	<p>Employment practices and controls currently implemented within Practices Cash Converters include:</p> <ul style="list-style-type: none"> <li>• Appropriate due diligence and pre- employment checks and screening.</li> <li>• Assessment of conflicts of interests; and</li> <li>• Police clearances.</li> </ul>
<b>Gifts, entertainment and hospitality</b>	<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> <p>The acceptance of gifts, entertainment and hospitality has to be lawful, occasional, of moderate value, not done in return for business services, information or advantage.</p> <ul style="list-style-type: none"> <li>• Employees must only offer or accept any gifts, entertainment or hospitality if permitted under Cash Converters Gifts and Benefits Policy.</li> <li>• 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.</li> </ul> <p>Refer to the Gifts and Benefits Policy for other aspects of the Company’s policy on gifts, entertainment and hospitality.</p> <p>The Anti-bribery Officer should be consulted if there is any uncertainty about a gift, entertainment or hospitality to be received or offered.</p>
<b>Public officials</b>	<p>In 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> <ul style="list-style-type: none"> <li>• No gifts should be made, offered or promised to any public official.</li> <li>• 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).</li> </ul>
<b>Record keeping</b>	<p>Cash Converters maintains appropriate records for all accounts, invoices and relevant documents and ensure such records are protected from misuse.</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.