

# Cash Converters International Limited Code of Conduct

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Version 3.2

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## 1. Purpose

At Cash Converters, we believe that every employee is entitled to an effective, productive and rewarding way of working. Our work and relationships support our individual needs to belong, contribute, undertake meaningful work, and for the opportunity to make a positive contribution to our business.

The Board has adopted this Code of Conduct to provide a set of guiding principles which are to be observed by all Employees.

Cash Converters expects all employees, including Key Management Personnel ('KMP'), Senior Leaders, Non-Executive Directors ('NED's') and contractors to operate and behave with the highest standards of personal and professional business conduct, ethics and integrity.

The Code of Conduct provides employees with general guidance on how to carry out activities fairly, ethically, and responsibly and in accordance with our values, our contracts, our policies and the legislation under which we operate.

## 2. Who does this Code apply to?

This Code applies to anyone who is employed by or works in the Cash Converters Group, including directors, employees, contractors and consultants. Agents and third-party service providers are also expected to know and observe the principles set out in this Code and should be made aware of this Code when we engage them to work with us.

This Code applies to you whenever you are identified as a representative of Cash Converters. In some circumstances, this will include times when you are representing the company at professional networking and development, business meetings and other work-related events that may occur outside of the workplace or working hours.

## 3. Our Values and Principles

The Code of Conduct will protect and enhance the integrity and reputation of Cash Converters by providing a standard to be used by Employees that is consistent with sound corporate governance and aligns behaviours to other Cash Converters policies.

Policies include:

- Anti Bribery & Corruption Policy (G.72)
- Bullying and Harassment Policy (G.5)
- Health, Safety and Wellbeing Policy (WHS.1)
- Conflict of Interest Policy (G.56)
- Diversity and Inclusion Policy (G.61)
- Employee Standards of Behaviour Policy (G.36)
- Employee Disciplinary Policy (G.32)
- Equal Employment Opportunity and Discrimination Policy (G.6)
- Gifts & Benefits Policy (G.59)
- IT Systems Acceptable Use Policy (G.20)

- Information Security Policy (ISM)
- Social Media Policy (G. 22.1)
- Media Policy (G22.2)
- Whistleblower Policy (G.90)

These policies and the Code of Conduct principles define our corporate culture. By following them consistently, we demonstrate to our colleagues, customers, business partners, communities and shareholders that we are worthy of their trust. This enhances our reputation and the value of our brand.

Employees are expected to always act consistently with the following principles:

**1. Act in compliance with the law and the Company's policies and procedures, and do not make or receive improper payments.**

The Company is committed to acting ethically and responsibly, complying with the laws and regulations of all countries in which it operates. Employees must be familiar and comply with all laws and regulations, and the policies and procedures of the Company that are applicable to their roles.

A breach of the law can have serious consequences for both the Company and the individuals involved. If there are any inconsistencies between the application of laws and regulations, and the Company's policies and procedures, then you should meet whichever sets the higher standard of behaviour.

*Anti-bribery*

Employees must not engage in activity that constitutes bribery, facilitation payments, secret commissions or money laundering. Such activity is contrary to principles of integrity and fairness, and is harmful to the Company's reputation amongst customers, suppliers, shareholders and the community.

Employees are required to comply with and uphold all laws against bribery and related conduct in all jurisdictions where the Company operates. The Company's Gifts & Benefits policy in addition to the Anti-Bribery and Corruption policy instructions require Employees to adhere to the following:

- do not offer or accept bribes, kick-backs and similar payments. Employees must never offer or accept any irregular payment to win business or to influence a business decision in the Company's favour (such as bribes, 'kick-backs' and similar payments in any form).
- do not accept gifts, entertainment or hospitality offers that would be deemed in breach of our policies. The Company recognises that accepting or offering gifts, entertainment or hospitality of moderate value is in accordance with usual business practice. Further information on acceptance of gifts is contained in the Company's Gifts and Benefits Policy.
- do not offer or accept gifts, entertainment or hospitality in circumstances which could be considered to give rise to undue influence.

- do not improperly influence an official. All dealings with politicians and government officers which relate to the Company and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage.
- recording of business dealings. All business dealings must be accurately documented to reflect the true nature of the transaction.
- expect the same from third parties as we expect of ourselves - Employees must take all practical steps to ensure that third parties (agents, contractors, intermediaries or business partners) dealing with or on behalf of the Company, do not engage in conduct that would contravene the Company's Conflict of Interest Policy, this Code or any laws.
- political donations - Any political donations must be authorised by the Board and will be disclosed as required by law and recorded in our accounts. Political donations may not be made at business unit or divisional level.

It is the Company's aim to act in a way that enhances the Company's reputation for fair and reasonable conduct when interpreting the law. Any failure to comply with the law, will be notified to the Chair of Audit and Risk Committee, Chief Risk Officer or Managing Director immediately the failure is known.

## **2. Act with honesty, integrity and fairness, and be accountable for our decisions**

Honesty, integrity and fairness are integral to the way in which our businesses operate and should guide all our decisions in order to maintain the trust of our customers, suppliers, shareholders and the community. Employees should act in a professional manner at all times by:

- performing duties with care and diligence and not participating in any illegal or unethical activities;
- not using misleading or oppressive practices or falsifying or wrongfully withholding information to achieve a benefit for the Company, its directors or employees;
- not disclosing confidential information or allowing it to be disclosed, without proper authorisation or as required by law;
- being accountable for all decisions and actions;
- treating all persons with respect and dignity, regardless of individual differences; and
- dealing fairly with all customers, suppliers, business partners and competitors.

## **3. Identify and manage external conflicts of interest**

All employees must always act in the best interests of the Company and must not enter into any arrangement to participate in any activity that would conflict with the Company's best interests or that would be likely to negatively affect the Company's reputation. If a conflict or potential conflict of interest arises, full disclosure shall be made to the Board. It is the responsibility of the Board to manage the conflict ensuring that the Company's interests are forefront.

Conflicts of interest may arise:

- When private interests conflict directly or indirectly with obligations to the Company;

- If a person doing business or seeking to do business provides benefits (including gifts and entertainment) which could be seen by others as creating an obligation to someone other than the Company; and
- By acting in ways which will cause others to question our loyalty to the Company.

To manage conflicts of interest, employees must:

- disclose any actual or perceived conflicts of interest to the appropriate officer:
  - in the case of divisions/business units, this is the divisional Key Management Personnel (KMP) – Chief Officer role;
  - in the case of Head Office employees, this is the Company Secretary or Managing Director:
- seek approval from KMP before accepting any outside business interests including non-Company work, business ventures, directorships (other than to a board of a non-trading family company), partnerships or other interests which have the potential to create a conflict of interest; and
- keep an arm's length relationship when dealing with customers and suppliers.

#### **4. Identify and manage internal conflicts of interest – relationships**

Relationships in the workplace have the potential to create internal conflicts of interest which may be damaging for the Company or individuals. Adverse workplace behaviour, or behaviour that negatively affects the workplace, having arisen due to a relationship, will not be tolerated.

Relationships defined by this policy include, but are not limited to: dating, romantic involvements, and sexual relations. In addition, a relationship is any internal relationship which may reasonably be perceived as creating or having the potential to create a conflict of interest.

Employees who are in a relationship must inform their Manager who is then required to advise the People and Culture Department. A determination will then be made by Head of People and Culture as to whether a conflict of interest arises or is likely to arise and any actions required to be undertaken.

Employees may be subject to disciplinary action (*Disciplinary Policy*) up to and including termination where they fail to openly and adequately inform their manager of a relationship in a timely manner.

#### **5. Respect and maintain privacy and confidentiality of information and accuracy of business records**

##### *Business information*

Employees may come across confidential information concerning the Company and its customers, employees and suppliers, such as technical, strategic or financial information, commercial arrangements or intellectual property.

As per the IT Systems Acceptable Use Policy, all Employees must:

- use confidential information solely for the purposes of their duties;
- preserve the confidentiality of the Company's confidential information and ensure that it is not disclosed, except on a "need-to-know" basis to other Employees or authorised recipients, or as required by law;
- maintain the confidentiality of information they come across in dealings with customers, suppliers and third parties; and
- not use or modify any confidential information for their own or a third party's interest or benefit.

These confidentiality obligations continue even after you have left the Company.

#### *Privacy obligations*

The Company is committed to complying with government legislation concerning privacy of personal information obtained by its businesses and protecting and safeguarding the privacy of people who deal with the Company.

All personal information that is collected must be used, stored, handled, and updated in line with the Company's *Privacy Policy*. If you have any queries in relation to your privacy obligations, contact the appropriate person as outlined in this policy.

#### *Business records*

We must ensure that we accurately and rigorously maintain all records relating to the Company's business and operations, including the safe and efficient storage and handling of documents to ensure compliance with legal obligations as well as to preserve documents of importance for business and/or historical reasons, as per the *Information Security Policy*.

## **6. Respect and do not misuse the Company's resources and information systems**

Employees must use Company property, funds, facilities and services for authorised purposes and not for personal benefit, or the benefit of unauthorised third parties. The Company regards the unauthorised removal of equipment, supplies and other resources belonging to the Company as theft.

Any transactions or disposals of Company property or resources must be approved by senior management and accurately recorded in financial records.

The Company's funds must not be used to provide excessive benefits (including gifts, entertainment, travel and accommodation) for employees.

#### *Information Systems*

Email, the internet, facsimile, telephones and other Company information systems must be used appropriately so as to maintain and not put at risk, the integrity of Company information systems.

The Company's *IT Systems Acceptable Use Policy* exists to manage risks associated with information technology systems and their use and all Employees must comply with the requirements of this policy at all times.

#### *Social Media/Networking*

Employees must ensure that they use any social media and networking sites in accordance with the requirements of this Code of Conduct and the Company's *Social Media Policy*.

### **7. Treat other employees with respect, value diversity and provide a safe working environment**

#### *Diversity*

Cash Converters does not tolerate discrimination, bullying, harassment or other unacceptable conduct. The Diversity and Inclusion policy exists to promote a diverse, supportive and inclusive environment by:

- Supporting each other and working collaboratively.
- Ensuring that we do not discriminate against, bully or harass our colleagues or anyone else in the workplace.
- Making employment decisions based on merit and performance.

#### *Safe working environment*

The Company will provide a safe working environment (*as per the Health, Safety & Wellbeing policy*) and comply fully with all local and national laws and regulations regarding safety in the workplace.

Employees will:

- report health and safety issues - take responsibility for safety by reporting any health or safety issues immediately;
- abide by health and safety policies and follow safety instructions at all times;
- comply with the Company's *Drug & Alcohol Policy*; and
- comply *with* the Company's *Bullying and Harassment Policy*; and
- comply with the Company's *Employee Standards of Behaviour Policy*

### **8. Engage in business relationships professionally and honestly**

From time to time the Company engages agents, contractors, consultants and other intermediaries (External Personnel), including outside Australia.

It is our policy to deal fairly and honestly with all External Personnel and ensure that all relationships with External Personnel are based on price, quality, service and reputation.

Improper conduct by External Personnel may expose the Company to legal liability or reputational damage. The Company is committed to the safe and ethical manufacture and supply of goods and services and reserves the right not to do business with External Personnel who do not share and demonstrate this commitment as per the *Conflict of Interest policy*.



## 4. Adherence to this Code

This Code has been approved by the Company's Board and has the full support of the Board and Key Management Personnel (KMP). Compliance with this Code is taken very seriously.

If you breach this Code, you may face disciplinary action, including termination of your employment. If the situation involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.

## 5. Who you can speak to

You have a responsibility to immediately report any breaches of this Code by a colleague to your immediate supervisor or manager, and you should also report conduct where you are unsure whether a breach of this Code has occurred.

All reports will be kept confidential and no employee will be disadvantaged or prejudiced by reporting in good faith a breach or suspected breach of a law, regulation, or of this Code.

Part 9.4AAA of the Corporations Act 2001 (Cth) – Protection for Whistleblowers - gives special protection to disclosures about breaches of that Act, as long as certain conditions are met, as outlined in s1317AA. The Company has a *Whistleblower Policy* covering these details.

## 6. Policy Amendment

This policy cannot be amended without approval from the Cash Converters Board.

## 7. Document Change History

Effective 14 March 2024