



## Cash Converters International Limited

### Code of Conduct

Cash Converters International Limited (the Company) is committed to making a positive contribution to society consistent with the principles of honesty, integrity, fairness and respect. The Board has adopted this Code of Conduct to provide a set of guiding principles which are to be observed by all Company personnel.

#### 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, consultants (Company Personnel). 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 outside of your workplace or working hours.

#### OUR PRINCIPLES

Company Personnel are expected to act consistently with the following principles at all times:

1. Act in compliance with the law and the Company's policies and procedures and do not make or receive improper payments.
2. Act with integrity, fairness and honesty, and be accountable for our decisions.
3. Identify and manage conflicts of interest.
4. Respect and maintain privacy and confidentiality of information and accuracy of business records.
5. Respect and do not misuse the Company's resources and information systems.
6. Treat other employees with respect, value diversity and provide a safe working environment.
7. Engage in business relationships professionally and honestly.

#### **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 not only to complying with the laws and regulations of all countries in which it operates, but also to acting ethically and responsibly. Company Personnel 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 both for the Company and for the individuals involved. If there is anything inconsistent between the laws and regulations applying where you work and the Company's policies and procedures, then you should meet whichever sets the higher standard of behaviour.

## *Anti-bribery*

Company Personnel 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.

Company Personnel are required to comply with and uphold all laws against bribery and related conduct in all the jurisdictions where the Company operates. Company Personnel must observe the following at all times:

- do not offer or accept bribes, kick-backs and similar payments - Company Personnel 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 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 - Company Personnel 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 Chief Risk Officer or Chief Executive Officer immediately the failure is known, and notified to the Audit and Risk Committee.

## **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. Company Personnel should act at all times in a professional manner 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 dignity, regardless of individual differences; and
- dealing fairly with all customers, suppliers, business partners and competitors.

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

All personnel must act in the best interests of the Company at all times 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, Company Personnel must:

- disclose any actual or perceived conflicts of interest to the appropriate officer:
  - in the case of divisions/business units, this is the divisional Chief Operating Officer;
  - in the case of Head Office personnel, this is the Company Secretary or Chief Executive Officer;
- seek approval from a Divisional Officer or Corporate Officer, as the case may be, 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. Respect and maintain privacy and confidentiality of information and accuracy of business records**

#### *Business information*

Company Personnel 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.

All Company Personnel 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 Company Personnel 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.

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

Company Personnel 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 Company Personnel.

#### *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 Company Personnel must comply with the requirements of this policy at all times.

#### *Bring Your Own Devices*

Company Personnel linking personal devices to Company information systems must ensure they obtain appropriate authorisation and use such devices in accordance with all relevant Company policies.

#### *Social Media/Networking*

Company Personnel 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*.

### **6. 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. We can create a diverse, supportive and inclusive environment by:

- Supporting each other and working collaboratively.
- Ensuring that we do not unlawfully 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 and comply fully with all local and national laws and regulations regarding safety in the workplace.

Company Personnel 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 *Smoke Free Workplace Policy*.

## **7. 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.

### **Adherence to this Code**

This Code has been approved by the Company's Board and has the full support of the Board and Executive Leadership Team. Compliance with this Code is taken very seriously.

As a measure of accountability, compliance with this Code is monitored by the Company's internal audit function on behalf of the Board.

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.

### **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 gives special protection to disclosures about breaches of that Act, as long as certain conditions are met, as outlined in s1317AA.

You should ensure that you have read and are familiar with the following Company policies referred to in this Code of Conduct:

<i><b>Policy reference</b></i>	<i><b>Policy title</b></i>
G.59	Gifts and Benefits Policy
G.56	Conflict of Interest Policy
G.38	Privacy Policy
G.20	IT Systems Acceptable Use Policy
G.3	Social Media Policy
G.7	Drug & Alcohol Policy
G.26	Smoke Free Workplace Policy