

# Anti-Bribery & Corruption Policy

**MoneyMe Limited (ACN 636 747 414)**

Approved by the Board on: 25 May 2023

**Table of Contents**

<b>1. PURPOSE</b>	<b>3</b>
<b>2. GOVERNANCE</b>	<b>3</b>
<b>3. WHAT IS BRIBERY AND CORRUPTION?</b>	<b>4</b>
<b><i>2.1 What behaviour is prohibited by the ABC Policy?</i></b>	<b>4</b>
<b>4. MONEYME'S PROCEDURES IN IMPLEMENTING AND MONITORING COMPLIANCE</b>	<b>5</b>
<b><i>3.1 Education and training</i></b>	<b>5</b>
<b><i>3.2 Knowing partners, agents and intermediaries</i></b>	<b>5</b>
<b><i>3.3 Investigations and audits</i></b>	<b>5</b>
<b>5. STAFF RESPONSIBILITIES</b>	<b>5</b>
<b>6. CONSEQUENCES FOR BREACHING THE ABC POLICY</b>	<b>6</b>
<b>7. REVIEW AND CHANGES TO THE ABC POLICY</b>	<b>6</b>

## 1. Purpose

MoneyMe Limited (MONEYME) is committed to conducting its business activities in an ethical, lawful and socially responsible manner, and in accordance with the laws and regulations of the countries in which it operates. MONEYME's reputation as an ethical business organisation is important to its ongoing success. Engaging in bribery and corrupt conduct would be contrary to this commitment and constitute a serious offence with criminal and civil penalties. It could also expose MONEYME to significant reputational damage.

This Anti-Bribery and Corruption Policy (**ABC Policy**) applies to all companies in the MONEYME Group and their employees, officers, directors and in certain circumstances, consultants, secondees, contractors, agents and intermediaries (collectively, **staff**). The ABC Policy supports MONEYME's Code of Conduct and, in particular, MONEYME's firm commitment to operating an ethical business organisation.

Staff must:

- (a) not engage in bribery and corrupt conduct or conceal such conduct;
- (b) comply with the laws and regulations which apply to MONEYME and its operations;
- (c) comply with the ABC Policy and all the procedures we adopt; and
- (d) report any concern or suspected or potential breach of the ABC Policy immediately.

The ABC Policy and our Code of Conduct are available in the corporate section of MONEYME's website.

## 2. Governance

MONEYME's governance relating to incidents or suspected incidents of bribery or corruption is conducted as part of its overall governance framework, with key roles detailed below:

Ref.	Area/Committee/Role	Responsibility
1.	Board	Overall accountability for MONEYME's governance and oversees compliance with relevant laws, regulations and internal policies. Review and update of this Policy by resolution.
2.	Audit & Risk Management Committee (ARC)	Board delegated accountability for compliance, including regular updates from management regarding bribery or corruption compliance.  Periodic review of the operating effectiveness of this Policy and recommendations to the Board.
3.	Management Committee (MC)	Management level governance relating to ABC compliance including review of this Policy.  Attestation through the ABC Policy compliance checklist.
4.	Chief Executive Officer and Chief Financial Officer	Receive reports of and investigate all potential ABC issues or breaches and immediate reporting to the Board.
5.	Whistleblower Protection Officer	Meet obligations in accordance with MONEYME's Whistleblower Policy.

Ref.	Area/Committee/Role	Responsibility
6.	All personnel	Understand and comply with this Policy and follow the reporting requirements.

### 3. What is bribery and corruption?

Bribery and corruption involves offering, promising or giving a benefit, favour, gift or anything of value with the intention of unduly influencing the behaviour of a person or a public official in the performance of their duty, in order to obtain or retain business or some other improper advantage. MONEYME has zero tolerance for bribery and corruption.

#### 2.1 What behaviour is prohibited by the ABC Policy?

The following are prohibited behaviour under the ABC Policy:

##### (a) Offering, paying or receiving bribes

Offering, making or receiving a bribe is strictly prohibited. Australia is a signatory to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and has enacted legislation prohibiting the offering, paying, causing or promising of anything of value to both foreign and domestic public officials. The legislation enables Australian regulators to prosecute its citizens and corporations for the bribery of public officials in Australia and in other countries.

Contravention of the anti-bribery and corruption laws of Australia and of other countries in which MONEYME may operate has serious criminal and civil consequences, such as imprisonment or fines.

##### (b) Offering, paying or receiving kick-backs or secret commissions

Offering, making or receiving a 'kick-back' or a secret commission as an inducement or reward for doing or not doing something, or showing or not showing favour of disfavour to any person in relation to business matters is also prohibited under Australian state and territory laws. Contravention of the state and territory anti-bribery and corruption laws has serious criminal and civil consequences, such as imprisonment or fines.

When entering into or managing relationships with third parties, appropriate procedures must be undertaken to identify and manage bribery and corruption risk.

##### (c) Offering or accepting gifts and hospitality beyond acceptable business courtesies

Offering, making or receiving a gift, business courtesy or hospitality can create an obligation or be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices. Staff must not give, seek or accept in connection with MONEYME's business any gifts, meals, refreshments and entertainment which goes beyond common courtesies associated with the ordinary and proper course of business. Staff must avoid anything that could reasonably be construed as a bribe or improper inducement.

Any gift, entertainment or other personal favour or assistance given or received which has a value in excess of \$500 (or any other amount determined by the Board) must be approved in advance by a Manager and entered into MONEYME's gifts register.

MONEYME supports a number of charitable causes including through donation matching and volunteering. Staff must take all steps reasonable to avoid giving or accepting donations that are intended to, or may, improperly influence them or others, or may be perceived to be improperly influencing others.

(d) Improper dealing of accounting records

Intentionally or recklessly making, altering, destroying, concealing or doing something with an accounting document with the intention of or concealing or disguising the receiving or giving of a bribe is strictly prohibited and is a criminal offence under Australian law.

Adequate financial records and record-keeping are important anti-bribery and corruption controls. Accurate and complete records of all transactions, payments and expenses must be maintained in accordance with general accounting principles.

## **4. MONEYME's procedures in implementing and monitoring compliance**

### **3.1 Education and training**

MONEYME will provide staff education and training in relation to bribery and corruption and the ABC Policy. The purpose of the education and training will be to assist staff in their understanding of what conduct is prohibited and unlawful and how to recognise and manage instances of bribery or corruption.

### **3.2 Knowing partners, agents and intermediaries**

Where relevant, MONEYME will conduct appropriate due diligence prior to engaging or entering into business relationships with third parties such as partners, agents and intermediaries. The purpose of the due diligence is to ensure that any entity or individual that MONEYME deals with is likely to behave in a manner consistent with the ABC Policy.

### **3.3 Investigations and audits**

Any potential breach of the ABC Policy by a member of staff will be properly recorded, investigated and dealt with.

The ABC Policy and related procedures will also be subject to periodic audit and review. Periodic risk assessments will also be undertaken to identify bribery and corruption risk. The objective of any such audit or assessment is to determine whether breaches of the policy were properly recorded, investigated and dealt with and whether the Policy or any of the procedures related to it need to be updated.

## **5. Staff responsibilities**

Staff are expected to ensure they understand the ABC Policy and the impact it has on their area/s of responsibility. In particular, staff must:

- (a) comply with the terms of the ABC Policy;
- (b) undertake all requisite training provided in relation to the laws and regulations relating to bribery and corruption and the ABC Policy; and
- (c) immediately report any concern, suspected or potential breaches of the ABC Policy to either:
  - i. the Chief Executive Officer;
  - ii. the Chief Financial Officer; or
  - iii. a Whistleblower Protection Officer in accordance with MONEYME's Whistleblower Protection Policy, which is available in the corporate section of our website.

## **6. Consequences for breaching the ABC Policy**

Any suspected breaches of the ABC Policy will be thoroughly investigated. Any material breaches of the ABC Policy will be reported to the Board.

In circumstances where a breach of the ABC Policy is established, appropriate disciplinary and remedial actions will be taken.

MONEYME reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of any law.

## **7. Review and changes to the ABC Policy**

The Board, through its Audit and Risk Management Committee, will review the ABC Policy periodically to ensure that it is operating effectively and whether any changes are required.

The Board may change this Policy (including the responsibilities of the Committee) from time to time by resolution.

If you have any questions regarding any aspect of the ABC Policy, please contact the Company Secretary.