Anti-Bribery & Corruption Policy

MONEYME Limited

ACN 636 747 414

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Table of Contents

1. PURPOSE 3
2. SCOPE 3
3. GOVERNANCE 3
4. WHAT IS BRIBERY AND CORRUPTION? 4
   4.1 What behaviour is prohibited by the ABC Policy? 4
5. MONEYME'S PROCEDURES IN IMPLEMENTING AND MONITORING COMPLIANCE 6
   5.1 Education and training 6
   5.2 Knowing partners, agents and intermediaries 6
   5.3 Investigations and audits 6
6. TEAM MEMBER RESPONSIBILITIES 7
7. CONSEQUENCES FOR BREACHING THE ABC POLICY 7
8. LOCATION AND CONTACT 7
9. MONITOR AND REVIEW 7
10. DOCUMENT CONTROL 7

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** or **Policy**) supports MONEYME's Code of Conduct and, in particular, MONEYME's firm commitment to operating an ethical business organisation.

Team Members 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. Scope

This Policy applies to all MONEYME employees, directors and in certain circumstances, consultants, secondees, contractors, agents and intermediaries (**Team Members**).

This Policy operates alongside and in accordance with principles defined within:

- The Code of Conduct;
- Managing Underperformance and Misconduct Policy;
- Whistleblower Policy;
- AML/CTF Program;
- Fraud Policy; and
- Securities Trading Policy.

3. 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 approval 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.

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

4. 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.

4.1 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. Team members 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. Team members 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. Team members 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.

(e) Facilitation payments

MONEYME strictly prohibits facilitation payments, regardless of local custom or practice, unless there is an immediate threat to health or safety. Any such instance must be reported immediately to the Chief Financial Officer and Chief Executive Officer and documented in accordance with MONEYME's incident reporting procedures.

(f) Political donations and activities

MONEYME does not make any direct donations to political parties, candidates or campaigns. This prohibition extends to in-kind contributions, including the provision of goods, services, staff time, resources or other non-monetary support to political parties, candidates or campaigns. Any and all political activity must be lawful, transparent, and not made with the intent to improperly influence decision-making.

(g) Lobbying and advocacy

MONEYME does not directly engage in "lobbying" or "advocacy" where these terms refer to activities carried out by MONEYME, that include:

- Communicating directly or indirectly with public officials, policymakers, or their representatives with the aim of influencing public decision-making; and/or
- Seeking to influence public opinion, directly or indirectly, beyond normal advertising and marketing practices, in order to steer public decision-making.

MONEYME does engage industry groups, such as the Australian Retail Credit Association, whose role includes:

- Communicating directly with regulators and policymakers in an effort to influence public decision-making or future regulations; and
- Indirect lobbying via intermediary organisations.

Where MONEYME participates in industry associations or engages intermediary organisations that conduct lobbying or advocacy on its behalf, MONEYME expects such engagement to:

- contribute to positive outcomes for society and the environment, consistent with MONEYME's purpose;
- be grounded in reliable, evidence-based data or peer-reviewed scientific research; and

- remain consistent with this Policy and MONEYME's corporate values.

If MONEYME becomes aware of a material misalignment between its position and that of an intermediary organisation, MONEYME will:

- disclose its own position and the nature of the misalignment;
- engage the intermediary organisation to attempt to rectify the misalignment; and
- if deemed necessary, cease its engagement with that intermediary.

5. MONEYME's procedures in implementing and monitoring compliance

5.1 Education and training

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

5.2 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.

5.3 Investigations and audits

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

Team members may report any potential suspicion of bribery or corruption to an Officer / Senior Manager, or in accordance with the reporting procedures in the Whistleblower Policy.

The person who received the report must provide the information to the Whistleblower Protection Officer as soon as practicable, removing any information which identifies or may identify the discloser of the information (the potential whistleblower) prior to doing so (unless the potential whistleblower has provided their consent to that disclosure).

As soon as practicable, the Whistleblower Protection Officer must determine whether the disclosure falls within the scope of the Whistleblower Policy and, if so, appoint an investigator with no personal interest in the matter to conduct an investigation into the matters disclosed, if they determine it to be necessary or appropriate.

Once a report is received, a preliminary assessment will be conducted within five (5) business days. If the concern/s warrants further investigation, the matter will be escalated as necessary, including to Police as relevant, and/or investigated in accordance with MONEYME's internal investigation procedures. All potential incidents investigated will be reported to the Board.

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.

All reports will be handled confidentially to the extent possible. MONEYME will take reasonable steps to protect the identity of individuals making a report and will not tolerate retaliation. MONEYME applies a risk-based approach to managing bribery and corruption risks. The nature and extent of due diligence, controls and monitoring will be proportionate to the level of risk posed by the transaction, geography, and persons involved.

6. Team member responsibilities

Team members are expected to ensure they understand the ABC Policy and the impact it has on their area/s of responsibility. In particular, team members 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. An Officer / Senior Manager.

7. 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 in accordance with the Managing Underperformance and Misconduct Policy.

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.

8. Location and Contact

This Policy will be stored and made accessible on Employment Hero. Should any clarification be needed for the contents of this Policy, the reader should contact HR via email.

9. Monitor and Review

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 Head of Operational Risk & Compliance.

10. Document Control

Version	Update/Approval Date	Comment
1.1	May 2025	• Added prohibition of facilitation payments, including health and safety exception and reporting requirements. • Added prohibition on political donations and requirement for lawful, transparent political activity.

Version	Update/Approval Date	Comment
		• Included clauses on managing reports (assessment timeframes, escalation, confidentiality, protection against retaliation). • Introduced risk-based approach to bribery and corruption risk management (due diligence, controls, monitoring). • Addition of Scope, Location, Monitor and Document Control Sections
1.2	June 2026	• Added lobbying and advocacy section