

MoneyMe Limited (ACN 636 747 414) (“Company”)

Corporate Governance Statement

MoneyMe Limited (**MoneyMe** or **Company**) is committed to conducting its business activities and governing the company in accordance with the ASX Corporate Governance Council’s (**Council**) Corporate Governance Principles and Recommendations (**Recommendations**) to the extent appropriate to the size and nature of the Company’s operations. This Corporate Governance Statement (**Statement**) details the extent to which the Company will follow, as at the date of its admission to the official list of the ASX, the Council’s Recommendations.

For the purposes of this Statement submitted pursuant to the Company’s pre quotation disclosure obligations, the Company’s corporate governance practices are structured with reference to the third edition of the Recommendations released on 27 March 2014 including the 8 principles and 29 specific recommendations included therein. The Company anticipates that commencing from reporting for the financial year ended 30 June 2020, it will report against the 4th edition of the Recommendations even though they are not due to come into effect until the Company’s financial year ending 30 June 2021.

While listed entities are entitled not to adopt the Recommendations in whole or in part, the ASX requires that entities explain why it has not adopted any particular recommendation on an “if not, why not” basis. The table set out below identifies which Recommendations the Company follows and which it does not, and provides reasons for not following those Recommendations as well as alternate governance practices (if any) the Company intends to adopt instead of those Recommendations.

The Company’s corporate governance policies together with a copy of this Corporate Governance Statement are all available on the Investor section of the Company’s website at www.moneyme.com.au (**Website**). This Statement was approved by a resolution of the Board of the Company dated 14 November 2019 November 2019 and is effective as at the same date.

All corporate governance policies have been adopted by the Company. All references to “the **Board**” below are references to the board of the Company. All references to “**Shareholders**” below are references to shareholders of the Company.

Principles and Recommendations	Compliance by the Company
Principle 1 – Lay solid foundations for management and oversight <i>A listed entity should establish and disclose the respective roles and responsibilities of its board and management and how their performance is monitored and evaluated.</i>	
Recommendation 1.1 A listed entity should disclose: (a) the respective roles and responsibilities of its board and management; and (b) those matters expressly reserved to the board	The Company complies with this recommendation. (a) The Company’s Corporate Governance Plan includes a Board Charter which sets out the principles for the operation of the Board and describes the functions of the Board and the functions delegated to management of the Company.

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<p>and those delegated to management.</p>	<p>(b) Clause 2 (a) of the Board Charter sets out the responsibilities and functions of the Board including those functions which the Board seeks guidance from the Board’s Remuneration and Nomination Committee (RNC) under clause 2 (b) and those functions which the Board seeks guidance from the Board’s Audit & Risk Management Committee (ARMC) under clause 2 (c). The Board may delegate consideration to any of its committees of the Board specifically constituted for the relevant purpose.</p> <p>Clause 3 sets out the responsibilities delegated to the CEO and management and clause 9 sets out the responsibilities delegated to the company secretary.</p>
<p>Recommendation 1.2</p> <p>A listed entity should</p> <p>(a) undertake appropriate checks before appointing a person, or putting forward to shareholders a candidate for election, as a director; and</p> <p>(b) provide shareholders with all material information in its possession relevant to a decision on whether or not to elect or re-elect a director.</p>	<p>The Company complies with this recommendation.</p> <p>(a) All of the Company’s current directors have undergone bankruptcy and police checks as part of the Company’s due diligence process prior to its Admission to the ASX. Prior to the appointment of any future directors, the Board will also ensure that bankruptcy and insolvency checks as well as any other checks the Board considers relevant (such as with respect to character, experience and education), will be undertaken prior to the appointment of that person as required under clause 4(a)(i) of the RNC Charter .</p> <p>(b) Clause 6 states that the Board will ensure that the Company provides shareholders with all material information relevant to enable shareholders to make an informed decision on whether or not to elect or re-elect a director. Clause 6(b)(v) of the RNC Charter provides that the names of candidates submitted for election or re-election as a director should be accompanied by all, material information including:</p> <ul style="list-style-type: none"> - <i>“...biographical details, including skills, experience, competencies and qualifications and information sufficient to enable an assessment of the independence of the candidate;</i> - <i>a statement by the Board as to whether it supports the nomination of the proposed candidate(s); and</i> - <i>details of relationships between the candidate and MoneyMe; and the candidate and directors of MoneyMe...”</i>
<p>Recommendation 1.3</p> <p>A listed entity should have a written agreement with each director and senior executive setting out the terms of their appointment.</p>	<p>The Company complies with this recommendation.</p> <p>The Company has a written agreement in place with each director and senior executive setting out the terms of their appointment, as required under clause 4 of the RNC Charter.</p>

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<p>Recommendation 1.4</p> <p>The company secretary of a listed entity should be accountable directly to the board, through the chair, on all matters to do with the proper functioning of the board.</p>	<p>The Company complies with this recommendation.</p> <p>Clause 9 of the Board Charter provides that the secretary is accountable to the Board on all matters to do with the proper functioning of the Board and its committees. The Secretary is generally responsible for carrying out the administrative and legislative requirements of the Board. The Secretary holds primary responsibility for ensuring that the Board processes, procedures and policies run efficiently and effectively.</p>
<p>Recommendation 1.5</p> <p>A listed entity should:</p> <p>(a) have a diversity policy which includes requirements for the board or a relevant committee of the board to set measurable objectives for achieving gender diversity and to assess annually both the objectives and the entity's progress in achieving them;</p> <p>(b) disclose that policy or a summary of it; and</p> <p>(c) disclose as at the end of each reporting period the measurable objectives for achieving gender diversity set by the board or a relevant committee of the board in accordance with the entity's diversity policy and its progress towards achieving them, and either:</p> <p>(i) the respective proportions of men and women on the board, in senior executive positions and across the whole organisation (including how the entity has defined "senior executive" for these purposes); or</p> <p>(ii) if the entity is a "relevant employer" under the Workplace Gender Equality Act, the entity's most recent "Gender Equality Indicators", as defined in and published</p>	<p>The Company complies with this recommendation.</p> <p>(a) The Company has a Diversity Policy which applies to the employees and directors of the Company and subsidiaries. Clause 3 of the Diversity Policy and clause 2(a)(viii) provides that the Board is responsible for setting measurable objectives to promote gender diversity and the Company's progress in achieving them. The Diversity Policy's effectiveness is measured at least annually.</p> <p>(b) The Diversity Policy is disclosed on the Company's website.</p> <p>(c) Clause 3 of the Diversity Policy and clause 7(c) of the Board Charter provides that the Objectives set for a reporting period and the progress towards achievement of those Objectives will be disclosed annually in the Group's annual report. This will include disclosure of (i) the respective proportions of men and women on the board, in senior executive positions and across the whole workforce of the Company and (ii) where the entity is a "relevant employer", the additional information required thereunder.</p>

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under the Act.	
<p>Recommendation 1.6</p> <p>A listed entity should:</p> <p>(a) have and disclose a process for periodically evaluating the performance of the board, its committees and individual directors; and</p> <p>(b) disclose, in relation to each reporting period, whether a performance evaluation was undertaken in the reporting period in accordance with that process.</p>	<p>The Company complies with this recommendation.</p> <p>(a) Clause 7 of the Board Charter provides that the Board will regularly carry out a formal review of its performance, its committees and each director.</p> <p>(b) The Board will disclose in relation to each reporting period whether a performance evaluation was undertaken in the reporting period in accordance with that process.</p>
<p>Recommendation 1.7</p> <p>A listed entity should:</p> <p>(a) have and disclose a process for periodically evaluating the performance of its senior executives; and</p> <p>(b) disclose, in relation to each reporting period, whether a performance evaluation was undertaken in the reporting period in accordance with that process.</p>	<p>The Company complies with this recommendation.</p> <p>(a) Clause 7 of the Board Charter provides that the Board will regularly carry out a formal review of the performance of its senior executives.</p> <p>(b) Clause 7 states that each year the Board will disclose confirmation that this review has taken place in the reporting period in accordance with that process.</p>
<p>Principle 2 – Structure the board to add value</p> <p><i>A listed entity should have a board of an appropriate size, composition, skills and commitment to enable it to discharge its duties effectively.</i></p>	
<p>Recommendation 2.1</p> <p>The board of a listed entity should:</p> <p>(a) have a nomination committee which:</p> <p>(i) has at least three members, a majority of whom are independent directors; and</p>	<p>The Company complies with this recommendation.</p> <p>(a) The Company has adopted a Remuneration and Nomination Committee Charter. Clause 2(a) provides that the RNC should, to the extent practicable given the size and composition of the Board from time to time, comprise:</p> <p>(i) a minimum of three members (currently chaired by Peter Coad with Susan Wynne as a member, both of</p>

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<p>(ii) is chaired by an independent director; and disclose</p> <p>(iii) the charter of the committee;</p> <p>(iv) the members of the committee;</p> <p>(v) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or</p> <p>(b) if it does not have a nomination committee, disclose that fact and the processes it employs to address board succession issues and to ensure that the board has the appropriate balance of skills, knowledge, experience, independence and diversity to enable it to discharge its duties and responsibilities effectively.</p>	<p>whom are independent directors, and Scott Emery as a non-independent member of the committee); and</p> <p>(ii) is chaired by an independent director being Peter Coad.</p> <p>The Company has or will at the appropriate time disclose:</p> <p>(iii) The charter of the RNC on its website;</p> <p>(iv) the members of the committee being Peter Coad, Susan Wynne and Scott Emery; and</p> <p>(v) at the end of each reporting period, disclose in its annual report the number of times the committee met throughout the period and the individual attendances of the members at those meetings.</p>
<p>Recommendation 2.2</p> <p>A listed entity should have and disclose a board skills matrix setting out the mix of skills and diversity that the board currently has or is looking to achieve in its membership.</p>	<p>The Company complies with this recommendation.</p> <p>Clause 5 of the Board Charter sets out the aim of the Board to have an appropriate mix of skills, experience, expertise and diversity relevant to the Company's business and the Board's duties and responsibilities.</p> <p>The Company's board skills matrix will be disclosed in the Company's future annual Corporate Governance Statements and on the Company's website which contains the biography of each director.</p>

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<p>Recommendation 2.3</p> <p>A listed entity should disclose:</p> <p>(a) the names of the directors considered by the board to be independent directors;</p> <p>(b) if a director has an interest, position, association or relationship of the type described in Box 2.3 but the board is of the opinion that it does not compromise the independence of the director, the nature of the interest, position, association or relationship in question and an explanation of why the board is of that opinion; and</p> <p>(c) the length of service of each director.</p>	<p>The Company complies with this recommendation.</p> <p>(a) The Board currently considers Peter Coad, John Lechte and Susan Wynne to be independent directors;</p> <p>(b) The Board does not consider that any of the current independent directors has an interest, position, association or relationship of the type described in Box 2.3 but, will disclose in future annual corporate governance statements any circumstances which the board is of the opinion compromise the independence of the director including the nature of the interest, position, association or relationship in question and an explanation of why the board is of that opinion; and</p> <p>(c) each of the current 5 directors of the MoneyMe Board were appointed upon the Company's incorporation on 11 October 2019.</p>
<p>Recommendation 2.4</p> <p>A majority of the board of a listed entity should be independent directors.</p>	<p>The Company complies with this recommendation.</p> <p>Clause 5 of the Board Charter provides that the majority of the Board should, to the extent practicable given the size and composition of the Board from time to time, be comprised of independent directors.</p> <p>At the time of listing, the Board will be comprised of 5 directors, of which 3 are considered by the Board to be independent directors being Peter Coad, John Lechte and Susan Wynne and the remaining 2 directors, Clayton Howes and Scott Emery are not considered to be independent directors.</p>
<p>Recommendation 2.5</p> <p>The chair of the board of a listed entity should be an independent director and, in particular, should not be the same person as the CEO of the entity.</p>	<p>The Company complies with this recommendation.</p> <p>Clause 8 of the Board Charter provides that the chairperson of the Board must be an independent director and must not hold (or held in the previous 3 years) the office of CEO. The Chair of the Board is Peter Coad who is an independent non-executive director.</p>
<p>Recommendation 2.6</p> <p>A listed entity should have a program for inducting new directors and provide appropriate professional development opportunities for directors to develop and maintain the skills and knowledge needed to perform</p>	<p>The Company complies with this recommendation.</p> <p>Clause 10 of the Board Charter provides that new directors will be briefed on their roles and responsibilities and the minutes and papers of Board and committee meetings will be made available to them. It also provides that time will be allocated at Board and committee meetings for the continuing education of directors on significant issues facing the company and changes to the regulatory environment.</p>

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their role as directors effectively.	
<p>Principle 3 – Promote ethical and responsible decision making</p> <p><i>A listed entity should act ethically and responsibly</i></p>	
<p>Recommendation 3.1</p> <p>A listed entity should:</p> <p>(a) have a code of conduct for its directors, senior executives and employees; and</p> <p>(b) disclose that code or a summary of it.</p>	<p>The Company complies with this recommendation.</p> <p>(a) The Company has a Code of Conduct which applies to employees, contractors, consultants, managers and directors of the Company including temporary persons falling within those category descriptions.</p> <p>(b) A copy of the Company’s Code of Conduct is disclosed on its website.</p>
<p>Principle 4 – Safeguard integrity in corporate reporting</p> <p><i>A listed entity should have formal and rigorous processes that independently verify and safeguard the integrity of its corporate reporting</i></p>	
<p>Recommendation 4.1</p> <p>The board of a listed entity should:</p> <p>(a) have an audit committee which:</p> <p>(i) has at least three members, all of whom are non-executive directors and a majority of whom are independent directors; and</p> <p>(ii) is chaired by an independent director, who is not the chair of the board, and disclose:</p> <p>(iii) the charter of the committee;</p> <p>(iv) the relevant qualifications and experience of the members of the committee; and</p> <p>(v) in relation to each reporting period, the number of times the committee met throughout the period and the individual</p>	<p>The Company complies with this recommendation.</p> <p>(a) The Company has established and ARMC which:</p> <p>(i) Has 3 members, all of whom are non-executive directors with 2 of those independent non-executive directors, John Lechte and Peter Coad, and the third member, Scott Emery, considered by the Board to not be independent; and</p> <p>(ii) The ARMC is chaired by John Lechte who is not chair of the Board.</p> <p>(iii) The Company is governed the Audit and Risk Management Committee Charter which sets out the ARMC’s roles and responsibilities and is available on the Company’s website;</p> <p>(iv) the relevant qualifications and experience of the ARMC members is available on the Company’s website and will be contained within the Company’s annual report each year; and</p> <p>(v) Clause 3(a) of the ARMC Charter provides that the ARC must meet at least two times annually or as frequently as is required to undertake its role effectively. The Company will, at the end of each reporting period, disclose in its annual report the number of times the Committee met throughout the period and the individual attendances of the members at those meetings.</p>

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<p>attendances of the members at those meetings; or</p> <p>(b) if it does not have an audit committee, disclose that fact and the processes it employs that independently verify and safeguard the integrity of its corporate reporting, including the processes for the appointment and removal of the external auditor and the rotation of the audit engagement partner.</p>	
<p>Recommendation 4.2</p> <p>The board of a listed entity should, before it approves the entity's financial statements for a financial period, receive from its CEO and CFO a declaration that, in their opinion, the financial records of the entity have been properly maintained and that the financial statements comply with the appropriate accounting standards and give a true and fair view of the financial position and performance of the entity and that the opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.</p>	<p>The Company complies with this recommendation.</p> <p>Clause 6 of the ARMC Charter provides that the ARMC will review the Company's financial statements with management and its external auditor before recommending that the Board approve the statements. The ARMC is also responsible for ensuring that appropriate processes are in place to form the basis upon which the Chief Executive Officer and Chief Financial Officer provide the recommended declarations in relation to the Company's financial statements. The Board will also ensure that it receives the appropriate declarations and assurances including a declaration from the Chief Financial Officer that the Company's accounts have been kept in accordance with section 295A of the <i>Corporations Act 2001</i> for the financial year.</p>
<p>Recommendation 4.3</p> <p>A listed entity that has an AGM should ensure that its external auditor attends its AGM and is available to answer questions from security holders relevant to the audit.</p>	<p>The Company complies with this recommendation.</p> <p>Clause 5.3(a)(iii) of the Constitution of the Company requires that a notice of meeting is sent to the Company's auditor in relation to each general meeting. Clause 5(e) of the Shareholder Communication Policy also provides that "...<i>MoneyMe's auditor attends its AGM and is available to answer any questions regarding the conduct of and any issues arising from the audit or the preparation and content of the auditor's report..</i>".</p>
<p>Principle 5 – Make timely and balanced disclosure</p> <p><i>A listed entity should make timely and balanced disclosure of all matters concerning it that a reasonable person would expect to have a material effect on the price or value of its securities.</i></p>	
<p>Recommendation 5.1</p>	<p>The Company complies with this recommendation.</p>

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<p>A listed entity should:</p> <p>(a) have a written policy for complying with its continuous disclosure obligations under the Listing Rules; and</p> <p>(b) disclose that policy or a summary of it.</p>	<p>(a) The Company has in place a Disclosure Policy designed to ensure compliance with the ASX Listing Rules on continuous disclosure and to ensure accountability at a Board and senior executive level for compliance and factual presentation of the Company's financial position; and</p> <p>(b) a copy of the Disclosure Policy which is disclosed on the Company's website.</p>
<p>Principle 6 – Respect the rights of security holders</p> <p><i>A listed entity should respect the rights of its security holders by providing them with appropriate information and facilities to allow them to exercise those rights effectively.</i></p>	
<p>Recommendation 6.1</p> <p>A listed entity should provide information about itself and its governance to investors via its website.</p>	<p>The Company complies with this recommendation.</p> <p>The Company provides the necessary information about itself and its governance on its website pursuant to its Shareholder Communication Policy.</p>
<p>Recommendation 6.2</p> <p>A listed entity should design and implement an investor relations program to facilitate effective two-way communication with investors.</p>	<p>The Company complies with this recommendation.</p> <p>The Company's Shareholder Communication Policy provides for an investor relations program which actively encourages two-way communication:</p> <ul style="list-style-type: none"> • through the Company's AGM, where shareholder participation is actively encouraged and facilitated; and • by providing shareholders with information via the investor section of the Company's website and the option to receive email communications and send email communications directly to the Company and to the Company's share registry.
<p>Recommendation 6.3</p> <p>A listed entity should disclose the policies and processes it has in place to facilitate and encourage participation at meetings of security holders.</p>	<p>The Company complies with this recommendation.</p> <p>The Company has in place a Shareholder Communication Policy, a copy of which is disclosed on its website.</p>
<p>Recommendation 6.4</p> <p>A listed entity should give security holders the option to receive communications from, and send communications to, the entity and its security registry electronically.</p>	<p>The Company complies with this recommendation.</p> <p>The Company's Shareholder Communication Policy provides securityholders the option to receive and send electronic communications directly to the Company and to the Company's share registry.</p>

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<p>Principle 7 - Recognise and manage risk</p> <p><i>A listed entity should establish a sound risk management framework and periodically review the effectiveness of that framework</i></p>	
<p>Recommendation 7.1</p> <p>The board of a listed entity should:</p> <p>(a) have a committee or committees to oversee risk, each of which:</p> <ul style="list-style-type: none"> (i) has at least three members, a majority of whom are independent directors; and (ii) is chaired by an independent director, and disclose (iii) the charter of the committee; (iv) the members of the committee; and (v) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or <p>(b) if it does not have a risk committee or committees that satisfy (a) above, disclose that fact and the processes it employs for overseeing the entity's risk management framework.</p>	<p>The Company complies with this recommendation.</p> <p>(a) The Company has established and ARMC which:</p> <ul style="list-style-type: none"> (i) Has 3 members, a majority of whom are independent being John Lechte and Peter Coad, with the third member, Scott Emery, considered by the Board to not be independent; and (ii) The ARMC is chaired by John Lechte who is not chair of the Board. (iii) The Company is governed the Audit and Risk Management Committee Charter which sets out the ARMC's roles and responsibilities and is available on the Company's website; (iv) The members of the ARMC are John Lechte (chair), Peter Coad and Scott Emery; and (v) Clause 3(a) of the ARMC Charter provides that the ARC must meet at least two times annually or as frequently as is required to undertake its role effectively. The Company will, at the end of each reporting period, disclose in its annual report the number of times the Committee met throughout the period and the individual attendances of the members at those meetings.
<p>Recommendation 7.2</p> <p>The board or a committee of the board should:</p> <p>(a) review the entity's risk management framework at least annually to satisfy itself that it continues to be sound; and</p> <p>(b) disclose, in relation to each reporting period,</p>	<p>The Company complies with this recommendation.</p> <p>(a) Clause 7 of the ARMC Charter provides that the Committee is responsible for reviewing the risk profile of the Company at least annually to satisfy itself that it continues to be sound and disclose that such a review has taken place in the Company's annual report; and</p> <p>(b) The Company will disclose in future annual corporate governance statements whether such a review has taken</p>

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whether such a review has taken place.	place in the reporting period.
<p>Recommendation 7.3</p> <p>A listed entity should disclose:</p> <p>(a) if it has an internal audit function, how the function is structured and what role it performs; or</p> <p>(b) if it does not have an internal audit function, that fact and the processes it employs for evaluating and continually improving the effectiveness of its risk management and internal control processes.</p>	<p>The Company complies with this recommendation.</p> <p>(a) Clause 4(a)(vii) of the ARMC Charter provides that the Committee is responsible for the review and report to the Board (at least annually) on the effectiveness of the Company's internal audit function and whether it is required; and</p> <p>(b) if not, ensuring that the Company discloses the processes it employs to evaluate and improve its risk management and internal control processes.</p>
<p>Recommendation 7.4</p> <p>A listed entity should disclose whether it has any material exposure to economic environmental and social sustainability risks and, if it does, how it manages or intends to manage those risks.</p>	<p>The Company complies with this recommendation.</p> <p>The Company will disclose whether it has any material exposure to economic, environmental and social sustainability risks and, if it does, how it manages or intends to manage those risks.</p>
<p>Principle 8 – Remunerate fairly and responsibly</p> <p><i>A listed entity should pay director remuneration sufficient to attract and retain high quality directors and design its executive remuneration to attract, retrain and motivate high quality senior executives and to align their interests with the creation of value for security holders.</i></p>	
<p>Recommendation 8.1</p> <p>The board of a listed entity should:</p> <p>(a) have a remuneration committee which:</p> <p>(i) has at least three members, a majority of whom are independent directors; and</p> <p>(ii) is chaired by an independent director.</p> <p>and disclose:</p> <p>(iii) the charter of the committee;</p>	<p>The Company complies with this recommendation.</p> <p>(a) The Company has adopted a Remuneration and Nomination Committee Charter. Clause 2(a) provides that the RNC should, to the extent practicable given the size and composition of the Board from time to time, comprise:</p> <p>(i) a minimum of three members (currently chaired by Peter Coad with Susan Wynne as a member, both of whom are independent directors, and Scott Emery as a non-independent member of the committee); and</p> <p>(ii) is chaired by an independent director being Peter Coad.</p> <p>(iii) The Committee has a charter which is disclosed on its website; and</p>

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<ul style="list-style-type: none"> (iv) the members of the committee; and (v) as at the end of each reporting period, the number of times the committee met throughout the period and the individual attendances of the members at those meetings; or (a) if it does not have a remuneration committee, disclose that fact and the processes it employs for setting the level and composition of remuneration for directors and senior executives and ensuring that such remuneration is appropriate and not excessive. 	<ul style="list-style-type: none"> (iv) at the end of each reporting period, disclose in its annual report the number of times the committee met throughout the period and the individual attendances of the members at those meetings.
<p>Recommendation 8.2</p> <p>A listed entity should separately disclose its policies and practices regarding the remuneration of non-executive directors and the remuneration of executive directors and other senior executives.</p>	<p>The Company complies with this recommendation.</p> <p>Details of the Company's remuneration policies and practices for non-executive directors, executive directors and senior management is disclosed in the Company's prospectus and will be included in the Company's remuneration report contained within its future annual reports.</p>
<p>Recommendation 8.3</p> <p>A listed entity which has an equity-based remuneration scheme should:</p> <ul style="list-style-type: none"> (a) have a policy on whether participants are permitted to enter into transactions (whether through the use of derivatives or otherwise) which limit the economic risk of participating in the scheme; and (b) disclose that policy or a summary of it. 	<p>The Company complies with this recommendation</p> <ul style="list-style-type: none"> (a) Clause 5.2 of the Securities Trading Policy prohibits directors and senior management (and their associated investment vehicles) from trading in financial products that limit the economic risk of security holdings (eg hedging arrangements); and (b) A copy of the Company's Securities Trading Policy is available on the Company's website.