

MORE GROUP ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Last Updated: January 2024

1. Anti-Bribery and Anti-Corruption Policy Statement

The More Group is committed to operating its businesses ethically and in compliance with all applicable legal and regulatory requirements. The purpose of this Policy is to enable the More Group to prevent, detect and respond to bribery and corruption risks and to comply with applicable anti-bribery and anti-corruption laws in the locations where it operates.

2. Scope

This Policy applies to all entities in the More Group of companies (the "**More Group**"), which includes:

- More Telecom Pty Ltd ("**More**")
- Tangerine Telecom Pty Ltd ("**Tangerine**")
- More Services Pty Ltd
- More Telecom Australia Pty Ltd
- More Connect Pty Ltd
- PayNuts Pty Ltd
- More Bookkeeping Services Pty Ltd

This Policy applies to all directors, officers, employees, suppliers, agents and other third parties who perform services for or provide services to the *More Group*.

3. Zero Tolerance for Bribery and Corruption

The *More Group* has zero tolerance for bribery and facilitation payments. You must not:

- give or offer bribes or facilitation payments to any third parties for any reason;
- solicit or accept bribes or facilitation payments for any reason;
- engage in any form of corrupt behaviour, including dishonest accounting or concealment of complete and accurate financial activity;
- make political donations on behalf of the *More Group*; and/or
- make charitable donations on behalf of the *More Group*, unless you have the prior written approval of the CEO and have followed all required internal policies and processes.

This position applies regardless of whether any of the above activities are legal or common practice in a location or country where the *More Group* or its representatives are operating.

A "bribe" is the offering or giving of anything of value to another party (whether directly or indirectly) for the purpose of obtaining, influencing or retaining an improper business advantage. A bribe may be in the form of monetary or non-monetary benefits, including cash, gifts, loans, donations, personal favours or entertainment.

A "facilitation payment" involves the payment of a small amount of money to a person in government or public office for the purpose of speeding up a process of obtaining a favourable decision.

4. Preventing, Identifying and Managing Bribery and Corruption Risks

We prevent, identify and manage bribery and corruption risks by:

- undertaking bribery and corruption risk assessments and appropriate due diligence screening on prospective employees, contractors, suppliers, partners, acquisition targets and other third parties which we may do business with or engage to provide services to the *More Group*, having regard to the nature of the business relationship, activities and level of risk presented;
- including and enforcing anti-bribery and anti-corruption obligations in contracts that the *More Group* enters into with relevant third parties;
- monitoring ongoing relationships with relevant third parties, including unusual or excessive requests for payment of expenses or non-standard fees, requests for payment to unusual locations or in non-standard currency;
- keeping records of bribery and corruption risk assessments and associated business transactions, and implementing appropriate controls and processes to monitor and manage and identified risks;
- responding to any events or changes to relationships that could increase bribery and corruption risks; and
- providing appropriate training to *More Group* team members on anti-bribery and anti-corruption laws and relevant *More Group* processes and policies; and fostering a speak-up culture in which they are encouraged to report concerns or potential incidents.

This Policy is approved by the directors of the *More Group* companies and reviewed annually.

5. Reporting bribery or corruption concerns

If you receive a request for or offer of a bribe or other form of improper payment, you should immediately reject it and report this as soon as possible in writing to your *More Group* manager and/or the *More Group* General Counsel & Head of Risk and Compliance.

If you become aware that a bribe or other form of improper payment has been paid or received, or you become aware of any other form of corrupt or improper conduct that is prohibited under this Policy or relevant laws, you should report this as soon as possible in writing to your *More Group* manager and/or the *More Group* General Counsel & Head of Risk and Compliance.

If You have concerns about your own well-being, treatment at work or career prospects as a result of making a report in connection with this Policy, the *More Group* has a whistleblowing program managed in accordance with the *More Group Whistleblower Policy*. This program offers protections from backlash to eligible whistleblowers who make disclosures in relation to bribery, corruption and other related matters.

Go [here](#) for more information about how to make a protected whistleblower report.

6. Breach of Policy

Compliance with this Policy is mandatory for *More Group* employees and contractors, and individuals may face disciplinary action if they fail to comply with it (including termination of their employment or contract for services). If any employee or contractor breaches any applicable law, they may also be personally liable for any applicable penalties.