

More Group Anti-Bribery and Anti-Corruption Policy

Last Updated	October 2026
Scope	This Policy applies to: • More Telecom Pty Ltd and Tangerine Telecom Pty Ltd (together, the More Group); • all directors, officers, employees, contractors, consultants and agents of the More Group; and • suppliers and other third parties providing goods or services to the More Group, including their personnel, agents and subcontractors, to the extent required under their agreement with the More Group or otherwise notified to them. In this Policy, these persons and entities are collectively referred to as Covered Persons. Covered Persons must comply with this Policy when acting for, representing, providing services to, or conducting business with or on behalf of the More Group.
Purpose	The More Group is committed to conducting business ethically, transparently and in compliance with all applicable anti-bribery and anti-corruption laws. This Policy prohibits bribery, corruption and facilitation payments, establishes the standards of conduct expected of Covered Persons, and supports the identification, prevention, reporting and management of related risks.
Zero tolerance for bribery and corruption	The More Group has zero tolerance for bribery, corruption and facilitation payments. Covered Persons must not, directly or indirectly: • offer, promise, give, authorise, request, solicit, agree to receive or accept a bribe; • make or authorise a facilitation payment; • use another person or entity to engage in conduct prohibited by this Policy; • engage in dishonest, fraudulent or corrupt conduct, or conceal, mischaracterise or fail to accurately record a payment, benefit, transaction or financial activity; • make a political donation on behalf of the More Group; or • make a charitable donation on behalf of the More Group without the prior written approval of the Chief Executive Officer and compliance with applicable More Group policies and approval processes. These prohibitions apply even if the conduct is customary, expected or permitted under local practices. No Covered Person will be penalised for refusing to offer, give, request or accept a bribe or facilitation payment, even

	if that refusal results in the loss of business or another commercial disadvantage to the More Group. Bribe. A bribe is any financial or non-financial advantage offered, promised, given, requested, agreed to be received or accepted to improperly influence a person, induce or reward improper performance, obtain or retain business or an improper advantage, or cause a person to act dishonestly or in breach of trust. It may include cash, gifts, loans, donations, personal favours, employment opportunities, travel or entertainment and may be provided directly or through another person. Facilitation payment. A facilitation payment is a payment or other benefit provided to a government or public official to secure or accelerate a routine action to which the payer is already entitled. Facilitation payments are prohibited regardless of their amount. Gifts, hospitality and other benefits. Gifts, meals, entertainment, travel, accommodation and other benefits must never be offered, provided, requested or accepted to improperly influence a decision, obtain an improper advantage or reward improper conduct. Any benefit connected with More Group business must have a legitimate business purpose, be reasonable and proportionate, be lawful and transparent, not create or appear to create an obligation or conflict of interest, and comply with applicable approval, disclosure and recordkeeping requirements. Cash and cash equivalents are prohibited. Covered Persons must decline or disclose any benefit that does not meet these requirements and seek guidance if uncertain.
Preventing, identifying and managing bribery and corruption risks	The More Group prevents, identifies and manages bribery and corruption risks by: • periodically assessing risks having regard to the More Group's activities, business relationships, operating locations and exposure to public officials; • undertaking risk-based due diligence before engaging employees, contractors, suppliers, business partners, acquisition targets and other relevant third parties; • applying enhanced due diligence and approval requirements where elevated risks or red flags are identified; • including appropriate anti-bribery and anti-corruption obligations, audit rights and termination rights in relevant contracts; • ensuring payments are properly authorised, supported by appropriate documentation and accurately recorded; • maintaining records of risk assessments, due diligence, approvals, transactions and identified risks; • monitoring relevant third-party relationships and reassessing them when circumstances or risk levels change; • implementing controls to address identified risks and escalating unresolved or unacceptable risks; • providing risk-based training and guidance to relevant More Group personnel; and

	periodically reviewing the design and effectiveness of relevant controls. No Covered Person may engage a third party to undertake conduct that would be prohibited if undertaken directly by the More Group. Red flags. Covered Persons must promptly escalate circumstances including requests for cash or payment to unrelated parties, offshore accounts or unusual locations; excessive or unexplained commissions, discounts, fees or expenses; vague or inaccurate invoices; refusal to disclose ownership, conflicts or relevant relationships; undisclosed connections with a decision-maker or public official; requests to bypass procurement, due diligence, approval or recordkeeping processes; unexplained urgency; or refusal to accept reasonable anti-bribery obligations. A red flag does not necessarily establish misconduct, but it must be assessed and resolved before the activity proceeds.
Reporting bribery or corruption concerns	Covered Persons must promptly report a request for or offer of a bribe, facilitation payment or other improper benefit; known or suspected conduct prohibited by this Policy or applicable law; an attempt to conceal or inaccurately record a relevant payment or transaction; or retaliation against a person who has raised or assisted with a concern. Reports may be made to a More Group manager or the More Group Chief Legal Officer. Eligible individuals, including More Group employees, contractors, suppliers and their personnel, may also report concerns through the More Group whistleblowing program in accordance with the More Group Whistleblower Policy. Reports may be made confidentially. The More Group prohibits retaliation against any person who raises a concern or assists with an assessment or investigation in good faith. Legal protections may also be available under applicable whistleblower laws. A person does not need proof of misconduct before reporting a concern but must have reasonable grounds for it and must not knowingly make a false report.
Non-compliance with policy and enforcement	Compliance with this Policy is mandatory for Covered Persons. The More Group will assess reported concerns promptly and, where appropriate, conduct a fair, impartial and proportionate investigation. Information will be handled confidentially so far as reasonably practicable, subject to the need to properly assess the matter and comply with legal obligations. The More Group may implement precautionary measures while a concern is assessed or investigated, including restricting access to systems, information or premises. These measures are not, of themselves, a finding that misconduct has occurred. A substantiated breach may result in corrective action or additional controls; disciplinary action against an employee, up to and including termination of employment; suspension or termination of a contractor, consultant, agent, supplier or other third-party engagement; exercise of contractual rights, including recovery of losses; withdrawal of authority to act for or represent the More Group; or referral to a regulator, law enforcement agency or other relevant authority where appropriate.

	Consequences will take account of the nature and seriousness of the conduct, the person's relationship with the More Group, applicable contractual or employment arrangements and relevant legal requirements. A person involved in bribery, corruption or related unlawful conduct may also be personally subject to civil or criminal penalties.
Policy review	This policy is approved by the CEO of the More Group companies. The Chief Legal Officer is responsible for maintaining the policy and coordinating its review. The policy will be reviewed at least annually and earlier where there is: • a material change to applicable law or regulatory guidance; • a material change to the More Group's operations, supply chains or risk profile; • a significant incident or identified control weakness; or • another development indicating that the policy may no longer be appropriate or effective.

Owner	More & Tangerine Chief Legal Officer
Effective Date	12/10/2026
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Next review date	11/10/2027