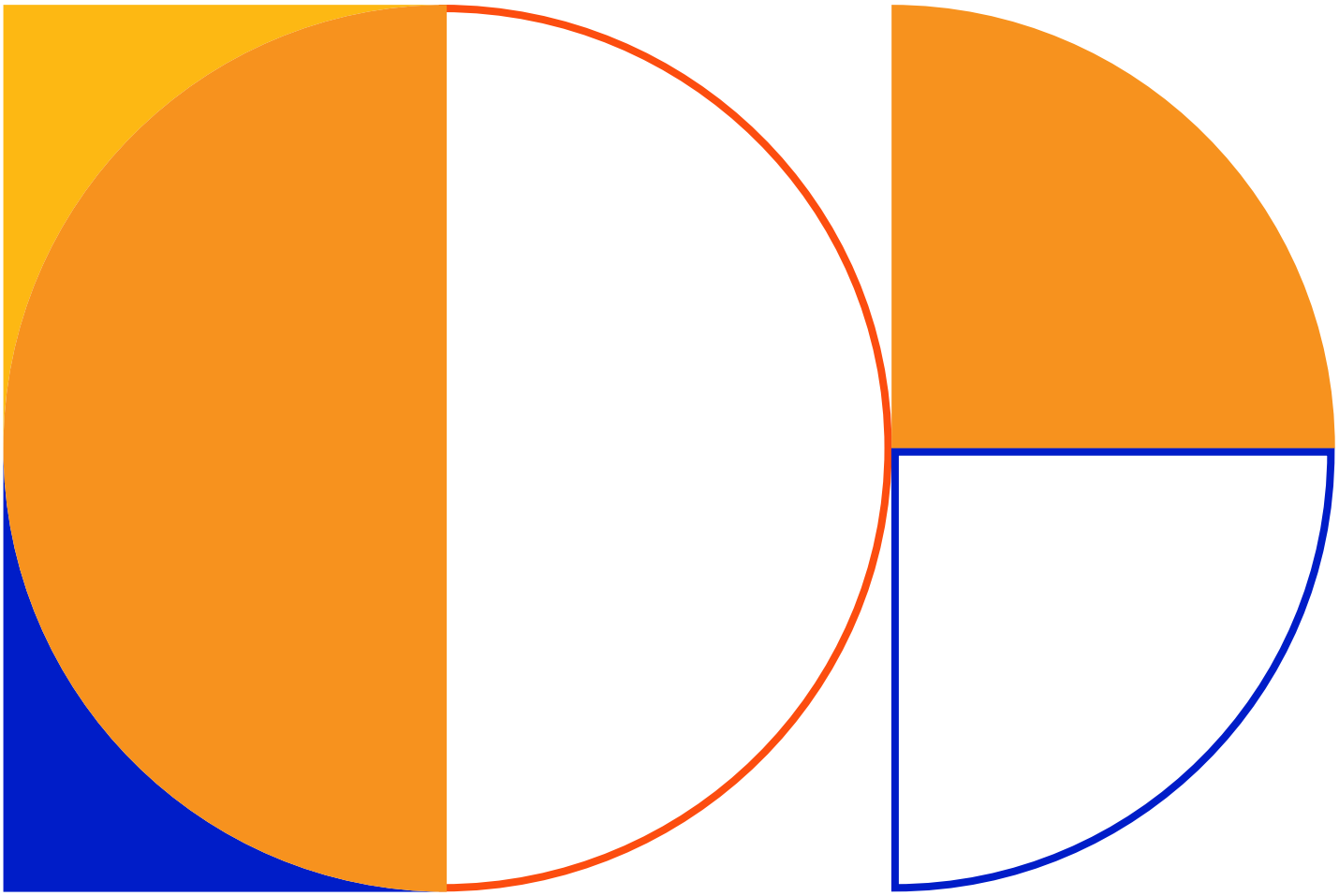


Title Date: 11 February 2026

Anti-Bribery and Corruption Policy

Version <3.2>

SG Fleet Group Pty Limited
ABN 40 167 554 574

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1. Purpose

SG Fleet Group and its relevant subsidiaries (SGF Group) is committed to conducting its business activities with integrity and ensuring measures are in place to prevent bribery and corruption.

SGF Group expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise a high standard of professionalism and ethical conduct in all their activities.

2. Scope

All employees must comply with this policy. A reference to 'employees' includes temporary employees, contractors and SGF Group directors.

The policy applies to all business activities with suppliers, contractors, customers and employees in every country in which SGF Group operates.

Responsibility lies with every person covered by the policy to conduct themselves in accordance with its requirements.

3. Interaction with other policies

This policy should be read in conjunction with the Code of Conduct, Supplier Code of Conduct, Whistleblowing Policy, other policies which are available via the SGF Group's intranets and the corporate website.

4. Principles

SGF Group prohibits bribery and corruption in any form whether direct or indirect and in any country in which it operates.

SGF Group will take appropriate steps to ensure that:

- We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
- We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.

- We engage and remunerate agents and other third parties only for legitimate services, with appropriate contractual arrangements and adopt appropriate transparency in our approach.
- We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures), policies and training programmes on induction and subsequently.
- We adopt management controls that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of “off the books” secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
- We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
- We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption. Gifts and entertainment have the potential to be misused or perceived as compromising business judgment. As such, SGF Group has specific rules in relation to gifts and entertainment to ensure openness and transparency.

5. Gifts and entertainment

5.1 Gifts and Entertainment Register

To eliminate the potential for an employee to be compromised through the acceptance of gifts or entertainment, all gifts and entertainment accepted (except legitimate business meals as described in this policy) irrespective of value, must be recorded via the centralised IMS Gift and Entertainment Register.

In the event an employee believes that it is prudent to refuse a gift or entertainment this should also be recorded so that the company is aware of the refusal and the reason for the refusal.

The Gift and Entertainment Register will be reviewed regularly by the Audit Risk and Compliance Committee.

5.2 Gifts

The Company accepts that there will be times, particularly at Christmas, when customers and suppliers will wish to give gifts to employees and to entertain employees. As a general policy the company accepts that these practices are common in the industry in which the company operates and is prepared to allow employees to accept gifts and entertainment of nominal value, whilst ensuring a high standard of ethical behaviour to maintain commercial impartiality and to protect against any suggestion of impropriety.

To this end, employees may accept gifts in the spirit in which they are offered, and in compliance with this policy, and must ensure that the value of gifts (on a singular or collective basis) is not perceived to influence the employee’s good business judgment or be of such value that it that may place the employee under any obligation contrary to the best interests of the Company. If an employee is ever in doubt as to whether a gift, gratuity,

entertainment or offer should be accepted or not, the employee should seek clarification from their manager before giving the party making the gift any indication in relation to their intention regarding the gift.

SGF Group reserves the right to request that seasonal gifts such as those received at Christmas, are accepted into a gift pool to be shared amongst all employees.

As noted above, all gifts accepted, irrespective of value, must be recorded via the centralised IMS Gift and Entertainment Register, whether they are contributed to the gift pool or not.

Note: Under no circumstances may an employee accept cash, secret commissions, equity or any negotiable instrument, which includes shares or equity.

5.3 Entertainment

Entertainment invitations may be accepted or made where they are necessary to develop and maintain business relationships relevant to work responsibilities. In accepting offers of entertainment, employees should adopt a similar approach to the acceptance of gifts. Such exchanges or invitations are neither sought nor expected as a basis of doing business with the Company. When attending functions/lunches employees must represent the company in a professional manner at all times and in accordance with the Code of Conduct and related policies, including this Anti-Bribery and Corruption Policy.

Entertaining external business stakeholders is acceptable practice where there is a justifiable business purpose for expenses to be incurred on behalf of SGF Group. Valid entertainment expenses may include meals and entertainment such as sporting events.

Business meals that are for the purpose of discussing SGF Group business which are not outside what is common courtesy (having regard to context and seniority of the employees) are not required to be recorded in the gift and entertainment register.

Invitations or provision of meals or entertainment where the cost exceeds the level of accepted common business courtesies (taking into account the location in which the entertainment takes place and what would be appropriate for the individuals role and responsibilities), may not be accepted or offered except in cases where there are legitimate business reasons for offer or acceptance. Exceptions may only be approved by the CEO, CFO or the relevant Country Managing Director and must be recorded via the gift and entertainment register.

5.4 Purchase of Gifts or Entertainment

SGF Group's general policy is that gifts can only be purchased for or distributed to customers if approved by the CEO, CFO or the relevant Country Managing Director

6.Breach of Policy

Breach of policy may result in disciplinary action which may include termination of employment, termination of contract or engagement. SGF Group may also inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

7. Reporting Channels

Employees are encouraged to report suspected breaches to their General Manager, Country Managing Director, CEO, CFO or the Group Head of People and Culture.

Alternatively, suspected breaches can be reported anonymously to STOPline:

Phone: 1300 30 45 50 (within Australia) or +61 3 9811 3275

Email: sgfleet@stopline.com.au

Mail: SG Fleet Australia Pty Ltd

C/- STOPline

Locked Bag 8, Hawthorn VIC 3122

