

Code of Conduct



EZCORP[®]

The Way We Do Business is as Important as the Business We Do

A Message from Lachie Given

Chief Executive Officer



EZCORP's Code of Conduct outlines the Company's expectations and provides guidance and examples on how to carry out your daily activities ethically and responsibly. When confronted with difficult choices, the Code of Conduct will provide you with the direction you need to make informed, ethical decisions. By following the Code of Conduct, we ensure that our Company not only complies with the law, but that integrity is a cornerstone of our Company culture.

Our purpose is to serve our customers' short-term cash needs, helping them to live and enjoy their lives. To honor this purpose, we must uphold our reputation for giving the best service to our customers by following our Code of Conduct and acting in accordance with our Company's Guiding Principles:

- **Leadership:** We are all leaders... At work and in the communities in which we live and serve
- **Customer-Centric:** Our customers are at the center of everything we do
- **Accountability:** We are each responsible for our words, actions, results, and outcomes
- **Respect:** We act with empathy, honesty, and integrity
- **Diversity:** We foster an environment that values diversity, inclusion, and development for all
- **Sustainability:** We positively impact the environment through our extensive network of reCommerce retail outlets

Each of us has an obligation to bring the Code of Conduct to life. Please take a moment to read the Code of Conduct, which you can find [here](#). The code also contains useful references and links to the policies that support our ethical practices. If you have any questions regarding this Code of Conduct, please contact Compliance@ezcorp.com.

Thank you for your continued dedication to building a better EZCORP.

A handwritten signature in blue ink that reads "L. P. Given". The signature is fluid and cursive.

Lachie Given
CEO

Our Purpose Statement

We exist to serve our customers' short-term cash needs, helping them to enjoy their lives.

We are driven by a diverse team with a passion for pawn who are motivated to be their best – Because our customers, families, stakeholders, and the communities and environment in which we live deserve it.

Our Ethical Principles

At EZCORP, we are guided by our vision and values and by an underlying set of ethical principles that go beyond legal requirements. These values and principles define our Company culture. By following them consistently, we demonstrate to our customers, shareholders, business partners, communities, and Team Members that we are worthy of their trust. This enhances our reputation and the value of our brand and helps us achieve our vision.

Honesty

We are honest and transparent. We never deliberately mislead or deceive anyone by misrepresentations, overstatements, partial truths, or selective omissions. We volunteer information when needed to avoid or correct misperception and we never steal, cheat, or seek to achieve anything by fraud or trickery.

Integrity

We follow our principles regardless of the situation. We demonstrate moral courage, always taking the high ground and doing the right thing, even when it is unpopular or when there is great pressure to do otherwise. We never let self-interest cloud our decision-making or cause us to deviate from doing what is right.

Reliability

We deliver on our commitments. This goes beyond complying with legal obligations. We try our best to fulfill the letter and the spirit of the promises we make, thinking carefully about what we can realistically achieve so we don't make commitments we're unable to fulfill. We communicate effectively to ensure mutual understanding.

Loyalty

We work together as a team to protect and promote the interests of our Company, customers, Team Members, shareholders, business partners, communities, and other stakeholders. We safeguard private and confidential information, and we avoid conflicts of interest. We recognize that no matter where we work or what we do, we are the face of the Company.

Respect

We honor the essential worth, dignity, autonomy, rights, and interests of all people. We treat everyone with civility, courtesy, and decency and we never engage in intimidation, coercion, or violence. In short, we treat others as we would like to be treated.

Responsibility

We hold ourselves accountable for our choices. We always strive to do our best and seek continuous improvement. We're thoughtful, careful, prepared, and informed. We try to overcome obstacles and finish what we start without making excuses. We exercise self-control and don't take shortcuts. We admit our mistakes and work hard to correct them.

Fairness

We are committed to justice and the fair and equitable treatment of individuals. Our decisions are open, unbiased, and made without favoritism, taking into consideration all relevant information and perspectives. We do not take advantage of the mistakes, challenges, or ignorance of others, nor do we use overreaching or indecent means to gain an advantage.

Caring

We are genuinely concerned with the welfare of others. We're friendly, compassionate, and kind. We always consider the business, financial, and emotional consequences of our actions and seek to accomplish our work in a way that achieves the greatest good. We support our communities and give back to them generously.

Leadership

When it comes to ethics, our Team Members, regardless of rank or position, are leaders. This means we sincerely embrace our values and principles, talk openly and proudly about doing the right thing, and serve as examples for fellow Team Members. In every situation, every transaction, every relationship, we lead with integrity.

Diversity

We are committed to fostering work environments that value diversity and inclusion. This commitment includes providing equal access to, and participation in, employment opportunities, programs, and services without regard to race, creed, religion, color, national origin, disability, sex (including pregnancy), sexual orientation, gender identity, veteran status, age, or stereotypes or assumptions based thereon. We welcome and celebrate our Team Members' differences, experiences, and beliefs.

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Our Code: An Introduction

We are committed to operating legally and ethically in everything we do. Our Code is a valuable resource in that respect. It sets out the standards of behavior expected of each of our Team Members and provides general guidance on how to carry out our daily activities in accordance with our values and ethical principles and in compliance with the letter and spirit of the law and our Company policies.

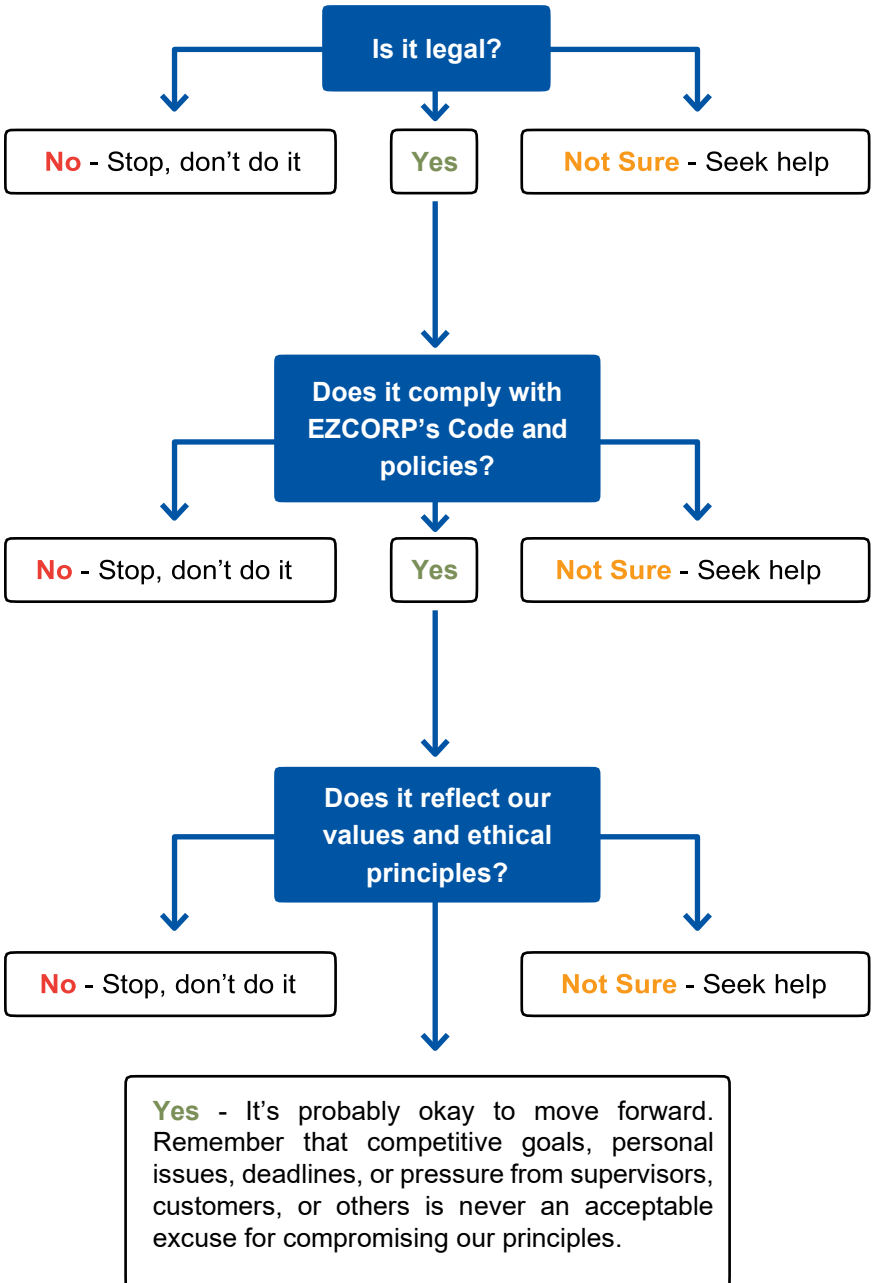


1.1 Our Code applies to you

Our Code of Conduct (“Code”) applies to all Team Members (employees), officers, and directors of EZCORP, Inc., and its subsidiaries and controlled affiliates. We also expect our consultants, agents, vendors, suppliers, service providers, subcontractors, franchisees, and other business partners to hold themselves to equally high standards. Failure to comply with the Code can result in disciplinary action, including termination. Each of us has a responsibility to:

- Read the Code and familiarize ourselves with the policies and procedures that apply to us
- Abide by the Code, regardless of our position or geographic location
- Complete all required ethics and training courses by the due date
- Never engage agents or other third parties to do for us indirectly what we’re not permitted to do ourselves

Most important? Use good judgment. If you are ever unsure of what to do, ask yourself:





1.2 Our Code applies in all EZCORP locations and businesses

We are a U.S.-based company, committed to complying with the laws of the U.S. wherever we do business. Of course, we are also committed to complying with local laws affecting our operations in other countries. If something permitted or required by our Code violates local law, we must follow local law. However, if a local custom or accepted business practice is permitted by local law but violates our Code, we must follow the Code. And whenever you're not sure which takes precedence, you should contact your Regulatory Compliance Department and ask for help.

Q&A

The Code seems to prohibit something that is perfectly legal and common practice in my country. Can I still do it?

No. If the code prohibits it, you should not do it. The only exception is if the Code prohibits something you are required to do by local law. In that case, you should consult with your Regulatory Compliance Department.

In addition to the general guidance in the Code, we have more specific policies and procedures in place that apply across the entire Company globally or within certain geographic regions or business units. Make sure you know and comply with the policies and procedures that specifically apply to you and your job.

1.3 Our Code has been adopted by EZCORP's Board of Directors

Our Code is the cornerstone of our ethics and compliance program. It has been approved and adopted by our Board of Directors and replaces all prior codes of conduct or ethics. Keep in mind, our Code is not a contract, and we may interpret, modify, or rescind some or all of its provisions, as well as related policies and procedures, at any time. Our Code is periodically reviewed. Any substantial amendments to the Code must be approved by our Board of Directors. The contents of the Code, as well as any material revisions or amendments, will be disclosed on our website.

Any waiver of any part of the Code for a director, executive officer, or senior financial officer requires the approval of our Board. If a waiver is granted, the details, including the reasons for the waiver, will be disclosed on our website in accordance with applicable securities rules and regulations.

Our Chief Compliance Officer is charged with the responsibility to manage the day-to-day operations of the ethics and compliance program, as well as to adopt global ethics and compliance-related policies and ensure the overall effectiveness of our compliance program.

1.4 Speak up, seek guidance

If you suspect that someone is violating the law, our Code, or our Company policies, it is your duty to report it right away. Talk to your supervisor, your Human Resources Manager, your Asset Protection Manager, the Legal or Regulatory Compliance Department, or use our Ethics Hotline to report your concern confidentially. The Ethics Hotline is a confidential reporting system managed by an independent third party. It is accessible via a toll-free telephone number (800-558-8896) or online web form (ezcorp.ethicspoint.com).

When you contact the Hotline, you may speak in your own language to a professional interview specialist or use a customized web form to document your concern in detail. Your information is then relayed to the Company for appropriate follow-up. You may check back to find out the status of the investigation or to report any additional information you may have, with the assurance of knowing that your concern is being handled discreetly and anonymously, where permitted by law.

Concerns about financial integrity and fraud, such as concerns about questionable accounting or auditing matters may be raised anonymously through any of the reporting resources mentioned above. These kinds of concerns may also be raised through a confidential written communication submitted directly to the Chair of the Audit Committee.

Team Members should use the reporting method with which they are most comfortable. All concerns may be raised confidentially, regardless of the means used to report them.

In accordance with our Internal Investigations Policy, all credible reports of suspected violations of law, our Code, or our Company policies will be investigated promptly, professionally, confidentially, and fairly, and appropriate corrective action will be taken.

If you have questions about the Internal Investigation Policy or are unsure of what to do in a given situation, you should seek guidance from your supervisor, your Human Resources Manager, the Legal or Regulatory Compliance Department, or you may use the Ethics Hotline to ask questions confidentially.

Q&A

I saw my co-worker writing a loan when there was no customer present. When I asked her about it, she said she was just renewing a loan for a good customer so his loan wouldn't drop. Something about that just didn't seem right. What should I do?

Trust your instincts. If you see or suspect misconduct, you have a responsibility to report it. Notify your supervisor or Asset Protection Manager immediately or contact the Ethics Hotline.

We do not tolerate retaliation in any form against anyone who in good faith asks questions, raises concerns, or cooperates with any internal or governmental investigations. Actual or threatened retaliation against anyone who reports a violation or cooperates in an investigation is a violation of our Code and should be reported immediately.

1.5 Make a Commitment

As EZCORP Team Members, we all need to show our commitment to ethical business practices and legal compliance by acknowledging that we have read, understand, and agree to abide by the Code. Following the law, our Code, and Company policies protects the Company and you and helps us achieve our vision of being the leader in our industry. Violations damage our reputation, expose us to fines, penalties, and legal risks and serve as grounds for disciplinary action.

Q&A

My supervisor asked me to do something that I think would violate our Code. What should I do?

Don't do it. No one – not even your supervisor – has the authority to tell you to do something illegal or unethical. Talk to someone else in management, your Human Resources Manager, your Asset Protection Manager, the Legal or Regulatory Compliance Department, or contact the Ethics Hotline. Ultimately, the success of our Company depends on each of us standing up for what's right, even when it feels inconvenient or uncomfortable.



1.6 Additional responsibilities for leaders

Although all Team Members must exercise leadership when it comes to ethics and compliance, supervisors, managers, and executives have additional responsibilities. It is not enough for them to behave legally and ethically themselves. They must also take proactive steps to influence Team Members to do the same. This requires a visible commitment to promote ethical conduct and compliance with legal requirements, our Code, and Company policies. If you are a supervisor, manager, or executive:

- Be a positive role model. Actions speak louder than words, so let your actions demonstrate your belief that business goals and profits are never more important than compliance with the law and our ethical principles. Refer to the Code often, let Team Members see that you use it as a reference and hold them accountable for their actions.
- Lead by example. Never abuse your position or influence, (e.g., improperly pressure Team Members for personal benefit or activities.)
- Set the right “tone from the top.” Be comfortable talking with your Team Members about the importance of acting legally and ethically.
- Explain how our Code supports our vision and values and ensures our success. Create the kind of workplace that encourages honest discussion of ethics and compliance challenges and how to do the right thing.
- Become familiar with the Code and the laws and policies that apply to our organization and ensure your Team Members understand their role in helping comply with the Code and the laws and policies impacting their role. Complete your own ethics and compliance training by the due date, and make sure your Team Members do the same.

- Create an inclusive environment where Team Members feel comfortable asking questions or raising concerns without fear of reprisal. Be available to respond to them, support them, and take action when necessary. Never retaliate against anyone who reports a concern in good faith or cooperates with internal investigations or audits. And don't tolerate it when others do so.
- Understand your special obligation to report behavior that you know or suspect is illegal or violates our Code or Company policies.
- Celebrate success. Recognize and reward Team Members whose behavior exemplifies our values and ethical principles and respond swiftly and appropriately to misconduct.

Our Values in Action

- Read and follow our Code. Use good judgment at all times and seek help whenever you are unsure of the right thing to do.
- Know and comply with the policies and practices that apply to the job you do and the geographic location where you do it.
- Promote an ethical EZCORP. Speak up if you see or suspect someone of violating our Code, our policies, or the law. Remember, we do not tolerate retaliation against anyone for sharing concerns in good faith.
- Remember that leaders have an even greater responsibility for upholding our vision, values, and ethical principles. If you manage Team Members, set a good example and promote an open dialogue about ethical issues.



Our Commitment to Our Team Members

We can't achieve anything without our Team Members; your actions and attitudes – individually and as a team – make us who we are as a Company. We are committed to open and honest communications, seeking out and welcoming diversity, treating everyone with dignity and respect, creating an environment of collaboration and inclusion, and helping you achieve and celebrate professional success. Please refer to your local Team Member Handbook and Company Policy Manual for detailed policies and guidance relating to your responsibilities at the Company.

2.1 Investigating and addressing suspected violations

Because we are committed to deterring and detecting wrongdoing, we take all credible reports of suspected misconduct seriously. In accordance with our Internal Investigations Policy, all internal investigations are conducted by qualified personnel who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly, and confidentially. Our General Counsel is responsible for overseeing all internal investigations of suspected ethics and compliance-related misconduct, including violations of law, our Code, or related policies. Representatives from the Human Resources, Accounting, Asset Protection, Legal or Regulatory Compliance Departments, or outside experts may be enlisted to assist in investigations as appropriate.

If you see or suspect misconduct, you have a responsibility to report your concerns immediately by using the various reporting resources available to you. It is important not to interfere in internal investigations or engage in your own fact finding.



Q&A

What is raising a concern “in good faith”? If I report a concern that turns out to be nothing, will I get in trouble?

Raising a concern “in good faith” means that you’re sincere in your attempt to provide honest and accurate information, even if you are later proven to be mistaken. You will not be subject to discipline or any kind of retaliation for speaking up about misconduct.

Keep in mind, a violation left unreported can damage our reputation and put fellow Team Members, customers, and the Company at risk. Even if you’re not sure, report any suspected violation – our Code requires it.

We treat all individuals involved in internal investigations with dignity and respect. All investigations and any resulting corrective action are conducted in compliance with local law and applicable Company policies. If you believe an investigation has been conducted improperly, share your concerns using any of the available reporting resources.

As a Team Member, you are expected to cooperate in internal investigations, audits, accounting reviews, or directions from the Company's lawyers in connection with lawsuits or government investigative proceedings. As part of the investigation, we may, where permitted by law, search Company-provided physical and information technology resources. We do not tolerate retaliation, in any form, against Team Members for raising issues or for providing information or assistance in connection with any of these types of investigations or reviews. If you think you are being retaliated against, report it immediately.

After an investigation is completed, we take appropriate disciplinary and corrective action. We may, in appropriate cases and subject to applicable local law, notify government authorities regarding individual misconduct and cooperate with any resulting prosecution or other government action.

In addition, when legally required or otherwise appropriate, we self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, is made by our Audit Committee of the Board of Directors, in consultation with our General Counsel and Chief Compliance Officer.

2.2 Complying with employment laws

We are committed to complying with all laws and regulations regarding all aspects of employment, including, for example, laws relating to employment rights and working conditions, employment of immigrants and non-citizens, calculation and payment of wages and other compensation, provision of benefits, attendance and time off, limits

on working time, protection of Team Member privacy and personally identifiable information, and other terms and conditions of employment. Every local Team Member Handbook and Company Policy Manual underscore our commitment to the law and is your resource for detailed information about all our employment policies and practices.



2.3 Equal employment opportunity

We are committed to equal employment opportunity for all Team Members who are legally authorized to work in the locations where we operate and to providing a work environment free of discrimination and harassment.

We do not tolerate discrimination against any applicant or Team Member based on race, creed, religion, color, national origin, disability, sex (including pregnancy), sexual orientation, gender identity, veteran status, age, stereotypes or assumptions based thereon, or on any other status or characteristic protected by the laws or regulations in the locations where we operate.

All employment decisions are based on Company needs, job requirements, and individual qualifications, without regard to the person's protected status or characteristics. We provide reasonable accommodations to individuals with disabilities and remove artificial barriers to their success.

For more information, see our Equal Employment Opportunity Policy.

2.4 Diversity and inclusion

Our Team Members are the most valuable assets we have, not only as individuals, but as a collective sum. Having a diverse workforce means our Team Members bring a wide variety of skills, abilities, experiences, and perspectives to the Company, all which are essential to our success. Diversity includes life experiences, knowledge, originality, self-expression, and unique competencies and talents.

The Company is committed to an inclusive work environment by deliberately taking actions to welcome individuals from different backgrounds. Inclusion means creating an environment that celebrates this diversity, listening to and learning from our Team Members and their unique backgrounds, encouraging Team Members to be their authentic selves, and promoting a workplace in which all Team Members feel they belong.

Having a diverse and inclusive environment within our organization represents a significant part of our culture, brand, reputation, and Company achievements.

All Team Members have a responsibility to treat one another with dignity and respect. Team Members are expected to display behavior that reflects inclusion. All Team Members are required to complete annual and ongoing diversity awareness training to enhance their understanding to fulfill this responsibility.

Any Team Member found to have exhibited inappropriate conduct or behavior against another Team Member may be subject to disciplinary action up to and including termination of employment. If you believe you've been subjected to any kind of discrimination that conflicts with the Code or Company policies, seek assistance from your Manager, your Human Resources Manager, or contact the Ethics Hotline.

For more information on our polices, diversity expectations, and initiatives, contact the Manager of Diversity and Inclusion.

Ask yourself: Am I treating others the way I want to be treated? Am I excluding any group when making decisions?

2.5 Providing a harassment-free workplace

We do not tolerate harassment against any Team Member or anyone else with whom we do business or have a relationship, both during and outside of work hours.



Harassment includes any derogatory treatment or comments made, whether intentional or not, about another person's character, good name, or standing, in which their race, creed, religion, color, national origin, disability, sex (including pregnancy), sexual orientation, gender identity, veteran status, or age is held in a bad light, ridiculed, or demeaned.

Sexual Harassment includes any unwelcome and offensive advances, requests, suggestions, or inferences, which may include jokes, threats, innuendos, comments, propositions, gestures, touching, pictures, or messages that are sexual in nature.

Harassment can include bullying and other actions such as the use of language, written materials, or objects in a way that interferes with a person's work performance or creates an intimidating, hostile, or offensive work environment.

If you see harassment, speak up. To report harassment, go straight to your supervisor, your Human Resources Manager, the Legal Department, or use the Ethics Hotline. Retaliation against anyone who raises a concern in good faith that harassment has occurred will not be tolerated. Make sure you know and comply with our Harassment-Free Workplace Policy.

Q&A

One of my co-workers makes sexually suggestive comments to one of our regular customers. Since she is a customer and not a Team Member, would that be considered harassment?

Yes. Our harassment policy applies not only to our Team Members but to those with whom we do business, including customers and vendors. Tell your co-worker to stop. Share your concerns with a manager, your Human Resources Manager, the Legal Department, or contact the Ethics Hotline.

2.6 Providing a healthy and safe workplace

We are committed to preserving the health and safety of our Team Members, customers, contractors, business partners, and anyone else working in or entering our facilities. We comply with the occupational health and safety laws and regulations of the locations where we operate.

You have a responsibility to observe applicable workplace safety rules and related policies and to promote an injury-free workplace at all times and in all locations. In addition, you have a responsibility to comply with all workplace rules relating to drugs and alcohol and must never work under the influence of illegal drugs, alcohol, or other substances that could impair your safety or the safety of those around you.

Never engage in violence, threats of violence, or other disruptive behavior, and speak up if you see or suspect violence by others. You must obey all laws and workplace rules relating to the use or possession of firearms or other weapons.

Finally, you must immediately report workplace injuries, illnesses, unsafe conditions, and violations of workplace safety rules, including rules relating to the use or possession of drugs, alcohol, or weapons. No Team Member will be subjected to retaliation or reprisal for being injured on the job or for reporting workplace injuries, safety rule violations, or unsafe conditions.



2.7 Compensating Team Members fairly and lawfully

We appreciate the time, talent, and energy our Team Members devote to their work and are committed to ensuring they are compensated in a fair and timely manner for their efforts. We comply with all applicable laws concerning pay, benefits, and working conditions. As a Team Member, you have a responsibility to comply with the policies in your local Team Member Handbook and Company Policy Manual.

You are required to record and report your time or activities accurately and completely. Never over or understate your time or activities or otherwise provide incorrect or inaccurate information on your time and activity records.

Q&A

Every night, after I've clocked out, my supervisor asks me to do additional tasks like putting boxes back in the stock room or taking out the trash. I don't mind doing them, but it doesn't seem right.

It's not right. Working "off-the-clock" violates our policy. You should not perform any additional tasks after your shift is completed and you have clocked out. Speak to your manager about this practice or, if you're uncomfortable, share your concerns with your Human Resources Manager or contact the Ethics Hotline.

If you are a supervisor or manager, make sure you understand the activities that must be recorded and reported as compensable time worked and never instruct or permit Team Members to falsify their time or activity records or fail to accurately record their time. Nothing should ever be withheld or deducted from a Team Member's pay except as required or permitted by law and authorized by Company policy.

2.8 Protecting Team Members' personal data

Each of us has a responsibility to safeguard the privacy, confidentiality, and security of Team Members' personally identifiable information and data. We comply with all applicable privacy and data protection laws in the countries where we operate.

Q&A

I received a call from an EZCORP Team Member requesting personal information about one of my co-workers. Can I provide this information to her?

You should not share personal information about others. If you receive a request for a Team Member's personal information, direct the request to the Human Resources Department for approval and response.

Team Members in Human Resources, Legal, and Compliance may collect personally identifiable information about Team Members to meet legal requirements or enable effective business operations.

If your role requires that you have access to a Team Member's personally identifiable information, make sure you take steps to properly secure it and that you access or use it only when authorized to do so by the Company for legitimate business needs and in accordance with applicable laws and Company policies.

For more information, see the Safeguarding Information and Access policy.

Q&A

What is “personally identifiable information”?

Personally identifiable information can include general information such as name, home address, email and IP address, telephone numbers, and government-issued identification numbers. It also includes more sensitive information, such as financial records, credit scores, credit card numbers, medical records, educational or employment records, and political or religious affiliations, which may be subject to additional specialized legal or contractual obligations.

Unless your role requires you to do so, you should not request or retain any Team Member’s personally identifiable information. If you gain access to a Team Member’s personally identifiable information or other private data, always take care to keep it secure and never share it with anyone inside or outside of the Company without the Team Member’s permission except as necessary to meet legal or legitimate business requirements.



Our Values in Action

- Help us maintain our reputation for integrity. Always cooperate fully in any investigation of misconduct, providing honest and truthful answers to any questions you are asked.
- Treat others with respect and dignity. Make sure you know and follow our policies on discrimination and harassment and comply with the practices outlined in your local Team Member Handbook and Company Policy Manual, which can both be found on the Company intranet.
- Promote safety on the job every day. If you become aware of an unsafe condition, report the situation immediately.
- Respect the laws that govern compensation. Report your time accurately and completely and never work “off-the-clock.”
- Protect the personally identifiable information of your fellow Team Members.

Related Policies and Further Guidance

[Local Team Member Handbooks](#)

[Internal Investigation Policy](#)

[Equal Employment Opportunity Policy](#)

[Reasonable Accommodation Policy](#)

[Harassment Free Workplace Policy](#)

[Workplace Violence Policy](#)

[Drug Free Workplace Policy](#)

[Firearms on Company Property Policy](#)

[Firearms Handling and Transactions](#)

[Firearms Manual](#)

[Reporting Injuries and Illness Policy](#)

Safety Policy

Safety Manual

Corrective Action Policy

Employment Status Policy

Overtime Pay Policy

Leaves of Absence Policy

Payroll Administration Policy

Jury Duty Policy

Expectation of Privacy Policy

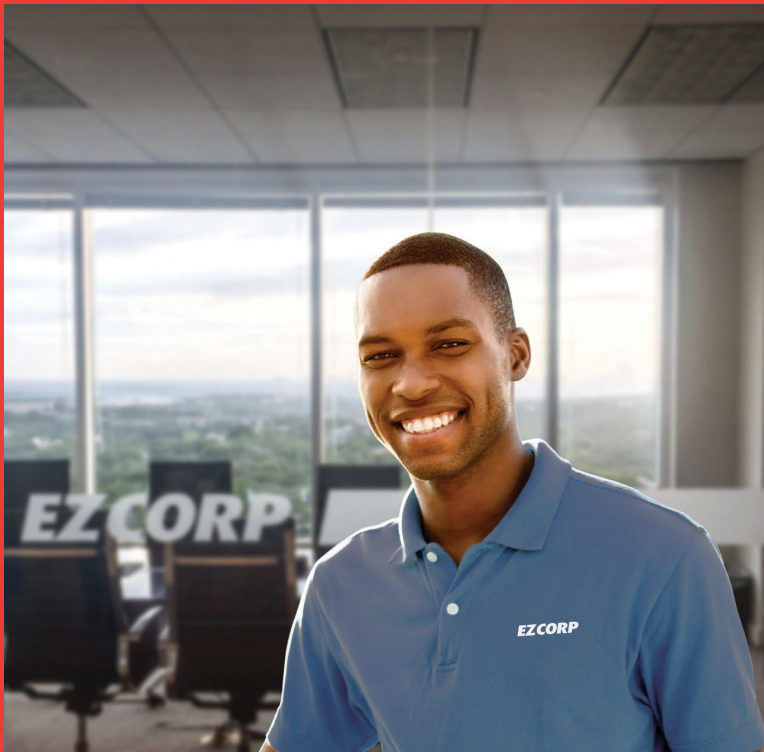
Information Security Policy

Immigration Law Compliance Policy

Open Door Policy

Employment Records Access and Security Policy

Safeguarding Information and Access Policy



Our Commitment to Our Shareholders

As a publicly traded company, we have a special responsibility to our shareholders who have invested their trust and financial resources in our success and expect a fair and reasonable return on their investment. We are committed to growing the value we bring to them and safeguarding their investment and our Company's reputation and assets. As part of that commitment, we comply with all applicable legal requirements, stock exchange rules, and other related requirements.



3.1 Ensuring the integrity of financial statements and regulatory filings

The integrity of our financial statements and other regulatory filings and disclosures is critical to the successful operation of our business and to maintaining the confidence and trust of our shareholders, customers, business partners, and other stakeholders.

All financial information about EZCORP that is filed with the U.S. Securities and Exchange Commission or disclosed publicly, as well as all information in statutory financial statements and tax filings, must be full, fair, accurate, timely, and understandable and must comply with applicable accounting principles, as well as the requirements of NASDAQ, the SEC, and other regulatory agencies.

Ask yourself: Am I accurate, honest, and complete in my everyday financial transactions?



Internal controls over financial reporting

We have established a system of internal controls to help ensure the integrity and timeliness of our financial reporting process. You are responsible for understanding and complying with these controls.

As required by the Sarbanes-Oxley Act of 2002, EZCORP's principal executive and financial officers certify in quarterly and annual statements their responsibility for establishing and maintaining control over the design and reliability of financial reporting.

If you are responsible for overseeing, operating, or evaluating any of our internal controls, make sure you perform your duties in accordance with Company policies, guidance, and instruction. If you are asked to provide, review, or certify information related to our internal controls, provide the information requested and respond in a full, accurate, and timely manner.

Company books and records

All documents that have a relationship to our financial results and reporting must be true and accurate. All transactions must be supported by accurate documentation in reasonable detail, recorded in the true and proper amount, and placed in the proper accounting period. You have a responsibility to honestly record information related to your job responsibilities, such as time and attendance, expense reporting, etc. In addition, all financial records, including supporting documentation for financial transactions, must be maintained in accordance with applicable legal requirements and our records retention policies.



My manager told me to hold an invoice for posting until next quarter. I have a responsibility to comply with his request, right?

No. All sales and expenditures should be reported and recorded in the period in which they are incurred. If you believe that goods or services are not being accounted for in the proper period, document and report it. Remember, you have a responsibility to be honest and accurate. If you ever feel pressured to do otherwise, speak with someone in the Legal or Internal Audit Department or contact the Ethics Hotline.

Never misrepresent our financial or operational performance or otherwise knowingly compromise the integrity of our financial statements. Do not enter information in the Company's books or records that intentionally hides, misleads, or disguises the true nature of any financial or non-financial transaction, result, or balance.

Financial and accounting fraud

We prohibit fraud and deception in all business transactions and financial reporting, whether committed by Team Members or third parties. Examples of fraudulent conduct include:

- Intentionally recording a false or misleading transaction or accounting entry
- Destroying or altering Company records
- Forging or altering Company checks
- Misusing Company credit cards
- Misappropriating funds or assets of the Company
- Falsifying expense reports
- Engaging in bribery, embezzlement, or money laundering
- Using or taking Company property or funds for private use
- Circumventing internal controls
- Entering into contractual relationships with customers, suppliers, or others without proper authority

We have procedures and controls designed to prevent, detect, and deter fraud and are committed to continuously enhancing them. Team Members who commit fraud are subject to disciplinary action up to and including termination, as well as civil and criminal prosecution.

Cooperation and non-interference with auditors and others

Always cooperate and communicate openly with members of the Internal Audit, Accounting, Legal, and Regulatory Compliance Departments, as well as with our independent auditors and government investigators and regulators. Never interfere with, influence, coerce, manipulate, or mislead them.

Raising financial integrity concerns or fraud

Immediately notify your supervisor, Human Resources Manager, Asset Protection Manager, the General Counsel, the Chief Compliance Officer, or contact the Ethics Hotline if you:

- Believe that you have discovered a weakness or error in the Company's internal controls system
- Believe an ethical violation has or will occur
- Become aware of improper or questionable accounting or auditing matters
- Feel that any type of fraud has or will occur
- Are instructed or feel pressured to enter false or misleading financial entries

You must report your suspicions no matter who is involved. Your report may be made anonymously; however, be assured that we will treat the matter confidentially even if you identify yourself and will not tolerate any form of retaliation against anyone who makes a good faith report.



My department is under a lot of pressure to “make the numbers”....

You have a responsibility to record entries in a way that fully and accurately reflects our transactions. Anytime you feel pressured to do something dishonest, report your concerns to the Legal or Internal Audit Department or contact the Ethics Hotline.

3.2 Carefully managing public disclosure and communicating responsibly

As a publicly traded company, our public statements must be carefully managed to ensure accuracy, fairness, timeliness, and compliance with legal requirements. For example, we are required under the U.S. federal securities laws to periodically disclose the public information relating to our financial performance and other material information. Who we tell and when we tell them is strictly regulated.

To ensure compliance with these requirements and achieve other business purposes, we have designated people and established procedures to communicate information to the public. For more information, see our Media Communication Policy.

Only authorized individuals can communicate our official position on certain topics such as financial performance, strategic business plans, legal matters, and public policy issues. Don't make any statements (written or verbal) on behalf of our Company unless you are authorized to do so.

Be careful when talking to others, especially in any form of written communication, including electronic and online communications such as email, instant messaging, online chats, blogs, or posts on social networking sites such as Facebook. Make sure you are familiar with our Social Media Policy; avoid offensive, inflammatory, or aggressive language. Try to be truthful and accurate. Misstatements, even if inadvertent, can put you and the Company at serious risk. Again, unless you are explicitly authorized to speak on behalf of the Company, make it clear while engaging in social networking or other online communication that your personal views are yours alone and do not reflect the Company's view or official position. Do not disclose confidential Company information or private Team Member or customer data. For more information, see our Confidential and Proprietary Information Policy.

Ask yourself: Do I use good judgment in my use of social media?

3.3 Prohibiting insider trading

“Insider trading” occurs when a person buys or sells a Company’s securities while in possession of material non-public information about the Company. “Material non-public information” is information that a reasonable investor would consider important in deciding to buy or sell stock. Examples may include yet to be announced financial information, mergers or acquisitions, supplier or customer relationships, changes in senior executive management, and new products.



I work in accounting, and we just finished calculating EZCORP’s quarterly earnings results. It’s been a good quarter! Can I purchase Company stock since everyone in our department knows?

No. This is material nonpublic information you know of because of your job. Trading on this “inside” information or tipping off others to do so is illegal.

If you have “inside” information about EZCORP or other companies, you are obligated to keep this information confidential. Do not trade in the Company’s securities or tip others to do so until the information has been released to the public. Appearances matter. Even if you don’t intend for someone to act on the information, sharing it violates your confidentiality obligations to the Company and could give rise to accusations of insider trading. Be sure you know and comply with our Insider Trading Policy.



3.4 Preventing theft and fraud

We do not tolerate theft or fraud. Theft is taking something of value that doesn't belong to you without permission. It can include physically taking something like money or property, or it can be done through lying or dishonesty. Fraud is a type of theft by deception. It involves making someone believe something that isn't true by words or conduct or by concealing important information, so that he or she will take or not take some action based on that misrepresentation and suffer harm, financial or otherwise, as a result. It includes acts such as forgery and embezzlement.

When Team Members steal or commit fraud, it damages our reputation and brand and hurts us all. Any Team Member who engages in or assists others with theft or fraud will be subject to disciplinary action up to and including termination of employment and will also be subject to prosecution.

Help safeguard our assets and reputation by watching for any kind of theft or fraudulent activities against our Company, our customers, shareholders, business partners, or other stakeholders. Always immediately report suspected or known instances of theft or fraud or suspicious activity to your supervisor, Human Resources Manager, Asset Protection Manager, the Legal or Regulatory Compliance Department, or contact the Ethics Hotline.

3.5 Vendors, suppliers, and other business partners

We choose vendors, suppliers, service providers, consultants, agents, subcontractors, and other business partners solely in the best interests of the Company. We are committed to obtaining the best value for the materials, goods, and services we purchase and maintaining the highest ethical standards in our dealings with third parties. We do not do business with vendors or suppliers or other business partners who do not hold themselves to the highest standards of legal compliance and ethical business behavior; therefore, the Company conducts reviews of third parties to ensure they meet our high standards and expectations to comply with legal and regulatory requirements and Company policy.

Only authorized Team Members may enter into purchase agreements or contracts with vendors, suppliers, and other business partners on behalf of the Company and all purchases must be made in accordance with proper approval, contracting, and internal control requirements.

We are good partners and never take unfair advantage of vendors, suppliers, or other business partners through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

For more information, review the Anti-Bribery and Anti-Corruption Policy and your local vendor management procedures.

3.6 Avoiding conflicts of interest

Each of us owes a duty of loyalty to the Company and must avoid actual or apparent conflicts of interest. A conflict of interest occurs when your position or job responsibilities present an opportunity for personal gain, or when your personal activities, investments, or associations, or those of your family or friends, compromise your judgment or ability to act in the Company's best interests.

You should never let personal interests or relationships influence the decisions you make as a Team Member. We should not use our position in the Company for personal benefit or to benefit family, friends, or close associates.

Professional engagements outside of the Company can result in a conflict of interest, including serving on the board for a for- or non-profit company, serving as a government official, or running for public office. Consult with the Legal or Regulatory Compliance Department if you are considering any outside professional engagement that may result in a conflict of interest.

No Team Member may serve on a board of a for-profit company, other than on behalf of, and at the request of, the Company, without the written approval of the Chief Executive Officer. In the case of the Chief Executive Officer, approval must be obtained from the Chairman of the Company's Board of Directors.

Because the appearance of a conflict of interest can be just as harmful to our reputation as an actual conflict, you must avoid situations that could be viewed as conflicting with the Company's best interests.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided at all times. For more information, consult the Anti-Bribery and Anti-Corruption Policy.

Ask yourself: Am I letting a personal activity or relationship affect my objectivity on the job?

It's not possible to list every situation that could present a potential conflict, but there are certain areas where conflicts typically arise. Actual or apparent conflicts of interest can arise in the following situations:

- **Outside financial interests** include ownership or financial interest in an enterprise with which we have or expect to have a business relationship, such as a supplier, customer, or a company with which we compete. Make sure your personal financial responsibilities don't conflict with your responsibilities to the Company.
- **Gifts from suppliers** – A gift of more than nominal value (\$100) can create the perception that our decision about a supplier was based on the gift instead of the merits of the supplier's goods or services. Always follow Company policies as they relate to gifts, entertainment, and travel.
- **Outside employment** – Being employed by or serving on the Board of Directors of a competitor, customer, or supplier can give rise to a conflict of interest. In any event, Company resources cannot be used in connection with any outside employment relationship. Don't let outside employment interfere with the time, talents, or energy you bring to your job at the Company.

- **Personal relationships** – Decisions about hiring and promoting or choosing a vendor can become difficult if the person you supervise or work with or want to engage with as vendor is a close relative or partner. Always comply with the Company's Nepotism Policy. Even if you work to remain objective in your business dealings, the fact that you share a personal relationship can create the appearance of a conflict and should be disclosed.

Q&A

One of my vendors mentioned that my manager is on the board of directors for her company. When I asked my manager about it, she said it was her personal business. Should I say something to someone at our company?

Yes. You are responsible for not only acting ethically and honestly, but also for speaking up when you see or suspect misconduct by others. If you become aware of a real or potential conflict of interest – yours or someone else's – you have an obligation to say something.

We have specific policies governing actual or apparent conflicts of interest. Make sure you comply with the Code and policies and procedures that apply to your location or business unit. If you find yourself in a position where a potential conflict exists, consult with your supervisor, your Human Resources Manager, the Legal or Regulatory Compliance Department, or contact the Ethics Hotline.



3.7 Gifts and entertainment

Gift giving and entertaining can be appropriate ways to show appreciation, develop deeper relationships, and build good will. But they can also create the perception of something improper. The legal requirements relating to business gifts and entertainment are complex; it's important that you always use sound judgment, comply with the law, and never allow gifts, entertainment, or personal benefits to influence your decisions or undermine the integrity of your business relationships. Never give or accept gifts or entertainment that would reflect negatively on our Company.

Receiving gifts and entertainment

You should never ask for or accept anything of value in exchange for Company business, providing favorable business terms, or otherwise reciprocating for any other activity relating to our business.

The Company will not engage in, or otherwise tolerate, any form of bribery or corruption in its business dealings, even when observance of this commitment may place the Company in a noncompetitive business position. The Company specifically prohibits offering, giving, soliciting, or receiving any form of a gift as a bribe or kickback.

Team Members may only offer, give, or accept gifts that are within applicable law and the Company's policies. Gifts should be limited to \$100 and cannot be deemed as lavish nor excessive in frequency. You may not offer, give, or accept any business courtesy or sponsorship that may be questionable, controversial, or reflect negatively on the Company's reputation and cannot be given to government or public officials. Gifts of cash, stock, or other securities are not appropriate in any circumstance.

Business meals and entertainment may be provided for legitimate business reasons, when customary to do so and should be unsolicited, infrequent, in good taste, and in accordance with the Anti-Bribery and Anti-Corruption Policy and applicable local policies and law. If the provider of the meal or entertainment is not in attendance, it is considered a gift and can only be accepted if it aligns with Company policy.



One of my vendors sent me a gift card for \$250 to a very expensive restaurant to thank me for my business. What should I do?

A gift in excess of \$100 violates our policy and could create the appearance that you're doing something improper. You should politely decline the gift and return it to the vendor.

Ask yourself: Would accepting this gift influence my business decision-making or make it appear that my business decision-making was influenced?

You should politely decline any gift or entertainment that does not comply with this Code or Company policy. If that would be difficult or embarrassing to the giver or if you have any question about gift giving or acceptance, seek guidance from your supervisor, your Human Resources Manager, the Legal or Regulatory Compliance Department, or use the Ethics Hotline.

Giving gifts and entertainment

Many of the rules relating to accepting gifts and entertainment also apply when providing gifts or entertainment to others. Anything of value that is offered to a third party must: be for legitimate business purposes; cannot exceed \$100 in the aggregate or as established by local policy; be in good taste and presented openly and transparently; not be in the form of cash, stock, or other securities; and never be in exchange for securing business, receiving favorable business terms, or other business consideration. Additionally, be sure to comply with the gift and entertainment policies of the recipient's organization and applicable law.

The rules relating to doing business with government entities and their employees are usually more restrictive and complex. You must always comply with legal requirements and government rules relating to gifts, entertainment, or other personal benefits provided to government employees or officials.

When dealing with federal, state, and local government agencies and other public institutions, always comply with applicable laws, regulations, and Company policies. Generally, gifts should never be provided to government employees or officials or those elected or appointed to public office. Consult the Anti-Bribery and Anti-Corruption Policy for more information.

3.8 Using information technology and other Company resources responsibly

The Company provides you with facilities, furniture, supplies, equipment, and information technology resources to help you do your work and counts on you to be a good steward of these resources, protecting them from theft, loss, damage, waste, and abuse. Help keep our physical assets safe and secure by following all security rules and procedures, such as using access codes when entering secure facilities and locking valuable equipment like laptop computers. Help keep our information technology resources safe from viruses, malicious software programs, and intrusion attempts by following all information security policies and procedures.

Team Members may occasionally use Company resources, including information technology resources, for limited personal use, but it must be appropriate and kept to a minimum.

Consistent with local laws, we reserve the right to monitor the use of our resources, including information technology resources.

3.9 Protecting confidential information and intellectual property

“Confidential information” or valuable business information belonging to the Company that is not available to the public should be kept secure at all times. It includes trade secrets and other intellectual property that has been developed, licensed, or acquired by the Company. It can also include information about customers, business partners, or others that has been disclosed to our Company under obligations of confidentiality.

Always be careful to protect the confidential information of our Company, as well as the confidential information of our customers, business partners, and other stakeholders. Know and comply with our Confidential and Proprietary Information Policy and take reasonable precautions to safeguard the information whether it is in physical or electronic form.

Q&A

I noticed some papers left on the copier that contained some financial information about one of our customers. What should I do?

You should treat the information as confidential information – don't read it and don't share it. Dispose of the papers in your location's secure documents container or shredder.

You must also carefully maintain and manage the Company's intellectual property rights, including patents, trademarks, copyrights, licenses, and trade secrets, to preserve and protect their value. This intellectual property makes us who we are and drives our success in the marketplace. Intellectual property that you create during the course of your employment with us belongs to the Company. You must promptly share any innovations or inventions you create with your supervisor so that we can take steps to protect these valuable assets.



3.10 Managing records effectively

Our records are important assets and must be managed appropriately. Each of us is responsible for using, storing, protecting, and disposing of Company records in accordance with applicable law and policy.

We may be subject to fines and penalties if we fail to retain or are unable to locate records during the required retention period. Our Records Management Policy outlines detailed procedures relating to the storage and disposal of Company records and ensures compliance with the laws. Each of us is required to be familiar with and follow this policy.



What is a “Company record”?

A Company record is physical or electronic evidence of a transaction, event, or decision and includes sales or service contracts, invoices, purchase orders, journal entries, and employment records.

3.11 Travel, entertainment, and business expenses

You are expected to use Company funds only for legitimate business purposes and not spend more than necessary. Never use Company funds for personal travel or entertainment. All business travel and entertainment expenses must be truthfully, accurately, and completely recorded. Expense report fraud, including submitting fictitious receipts, reporting inflated mileage, using false customer names, or fabricating business purposes, will not be tolerated and will result in disciplinary action.

You have a responsibility to adhere to the Travel and Expense policy and to follow Company procedures regarding the use of corporate credit cards. When possible, preferred travel vendors must be used. Management must pre-approve expenses, and all receipts, expense reports, and other expense related documents must be maintained.

Our Values in Action

- Ensure the integrity of our financial records – be accurate and complete, and comply with all internal controls, policies, and procedures.
- Always cooperate fully with inquiries from authorized auditors, investigators, and regulators.
- Be on the lookout for fraud, not only within our Company books and records but also in our business operations with customers, business partners, and other third parties.
- Be responsible in what you write and what you say about our Company. Don't speak on our behalf of the Company unless you're specifically authorized to do so.
- Don't trade or tip others to trade on material, non-public ("inside") information.
- Remember that appearances matter: Don't let your interests or activities outside of the Company suggest a conflict of interest.
- Protect our reputation and future success. Follow Company policy as it relates to receiving and giving gifts, entertainment, and travel.
- Be a good steward of Company resources and protect them from theft, loss, damage, waste, and abuse.
- Protect confidential information about our Company and companies with which we do business.
- Know and comply with the procedures for managing, storing, and disposing of Company records.

Related Policies and Further Guidance

Sarbanes-Oxley Project Planning Memo for EZCORP, Inc.

Information Technology Security Policy

Media Communication Policy

Social Media Policy

Confidential and Proprietary Information Policy

Insider Trading Policy

Nepotism Policy

Anti-Bribery and Anti-Corruption Policy

Safeguarding Information & Access Policy

Use of Company Electronic Resources Policy

Records Management Policy

Travel and Expense Policy



Our Commitment to Our Customers

We exist to serve our customers who are hard-working people with hopes, dreams, and financial needs similar to our own. We are proud to offer them innovative and reasonably priced financial solutions that help them meet their needs and achieve their goals. And we are committed to doing this in a friendly, knowledgeable, and respectful way, with passionate devotion to superior customer service and uncompromising integrity.



4.1 Consumer protection and fair dealing

We comply with all laws promoting consumer protection and prohibiting deceptive trade practices. Our products and services are designed to comply with all regulatory requirements where offered, and we take steps to ensure that any changes to products and services meet our standard of compliance, including the mitigation of customer harm. Everything we tell customers and prospective customers about our products and services in our advertising, sales, and marketing communications or otherwise must be truthful, accurate, complete, understandable, and made in good faith and in compliance with applicable laws.

Never take unfair advantage of customers through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.



4.2 Non-discrimination and equal credit opportunity

We value all our customers. We do not discriminate against any customer or prospective customer on the basis of race, creed, religion, color, national origin, disability, sex (including pregnancy), sexual orientation, gender identity, veteran status, age, or any other status or characteristic protected by the laws or regulations in the locations where we operate.

We will make reasonable accommodations when needed to ensure our customers with disabilities have access to our goods and services. We are specifically committed to providing loan finance services to applicants and borrowers on a fair and equal basis. We treat all applicants and borrowers consistently and in compliance with fair lending laws throughout the entire loan process, from application to satisfaction.

Any Team Member found to have exhibited inappropriate conduct or behavior against a customer, vendor, or someone with whom we do business may be subject to disciplinary action up to and including termination of employment. If you witness any kind of discrimination that conflicts with the Code or Company policies, seek assistance from your Manager, your Human Resources Manager, or contact the Ethics Hotline.

4.3 Consumer lending laws and regulations

We are committed to complying with all applicable consumer laws and regulations governing our products and services. Among other things, these complex and detailed laws limit the terms and conditions that may be included in loan agreements and regulate what must be disclosed to consumers. We have detailed policies and procedures that ensure compliance with these laws, and you are required to be familiar with them and are expected to follow them in your everyday business dealings.

As a regulated entity, we are subject to regulatory visits and inspections. We are committed to supporting our regulators' duty to assess compliance and inspect our books and records. Should a regulator visit your location or contact you for information, be sure to inform management, check their credentials, and engage Regulatory Compliance. Most importantly, do not allow access to corporate documents or customer information without approval from your manager.



What should I do if someone comes into the store saying they are a regulator and requests access to pawn tickets?

You should not provide confidential information to any person until you confirm that it is a formal regulatory request. Contact your Store Manager or the Legal or Regulatory Compliance Department to seek further advice.



Ask yourself: Am I complying with the law and Company policy?

4.4 Product laws and regulations

We comply with all federal, state, and local laws and regulations governing our products and services. In some cases, we are required to obtain and maintain licenses or registrations to offer our products and services. When conducting business, we strive to meet all mandatory activities related to the transaction, including conducting background checks and reporting necessary information to the appropriate authorities or regulatory bodies.

Q&A

What should I do if I see something that may violate consumer lending laws or laws governing our business or products and services?

Notify the Regulatory Compliance Department or contact the Ethics Hotline.

4.5 Unfair, deceptive, or abusive acts or practices

Federal law makes it unlawful to engage in any unfair, deceptive, or abusive act or practice. This requirement is in addition to the pawn laws and regulations we follow. You should be aware of practices that may be considered unfair, deceptive, or abusive. Consider the following:

- “Unfair” activities or practices:
 - May cause substantial injury
 - Are not reasonably avoided
 - Cause injury that is not outweighed by the benefit provided
- “Deceptive” statements or omissions are misleading, regardless of intent
- “Abusive” acts or practices:
 - Interfere with a customer’s ability to understand the financial product or service offered
 - Take unreasonable advantage of customers

Ask yourself: Does the customer have everything they need to know to make an informed decision?

4.6 Fair debt collection practices

We are committed to complying with all laws and regulations governing the collection of personal, family, and household debts. We have detailed policies and procedures to ensure compliance with these laws. As a Team Member, make sure you provide all required disclosures and that you follow our Company’s policies and procedures if you are involved in debt collection and related activities.

4.7 Protecting customer information and privacy

We earn the trust of our customers and others by keeping personal non-public information safe while complying with the privacy and data protection laws of the countries and states where we do business. Various laws in the U.S. and other countries regulate the collection, use, storage, disclosure, and deletion of personally identifiable information, non-public personal financial information, and sensitive personal information. We have detailed policies and procedures, including our Safeguarding Information and Access Policy, to ensure compliance with these laws. Make sure you are familiar with and follow them to the extent applicable to your business segment.

Q&A

I have a friend who is starting a new business and has asked me for a list of our Company's customers who might be interested in her services. Can I provide it?

No. Our customers rely on us to protect their information and use it only in accordance with our published policy. It is your responsibility to protect and maintain the confidentiality of this information and never share it with those who are not authorized to use it as part of their job.

Our Values in Action

- Be fair in your dealings with customers and prospective customers and truthful in what you say about our products and services.
- Never discriminate against customers based on any status protected by law or regulations in the locations where we operate.
- Understand the laws and regulations governing our products and services.
- Know and comply with our Company's compliance policies and procedures, including those related to consumer lending and fair debt collection.
- Respect privacy – safeguard the personally identifiable information of our customers and others with whom we do business.

Related Policies and Further Guidance

Compliance policies (e.g., UDAAP, TILA, ECOA, etc.)

Safeguarding Information & Access Policy

Information Security Policy

PLAN

ment or Store Credit • As Low as 9%

W
YO



Our Commitment to Good Citizenship and Community Involvement

We believe that being a responsible corporate citizen means upholding laws designed to protect the fairness and efficiency of commerce, prevent criminal enterprise, promote security, protect the environment, and benefit society as a whole. It also means giving back to and supporting the communities where we live and operate.



5.1 Anti-bribery and anti-corruption

We do not tolerate bribery, kickbacks, or corruption of any kind, regardless of where we are located or where we do business. You must never engage in this kind of behavior when dealing with governmental agencies and even non-governmental customers, suppliers, or other third parties. If someone offers you or asks you for payment or goods or other valuable courtesies as part of a business transaction, decline the offer and report the incident to your supervisor, your Human Resources Manager, the Legal or Regulatory Compliance Department, or use the Ethics Hotline.



Doing The Right Thing

Q&A

I'm working with a vendor in another country. Is it okay to give the official a payment in order to obtain a license to open the store?

No. Those kinds of payments are prohibited by some laws. Your best course of action under this circumstance would be to contact the Legal or Regulatory Compliance Department for guidance.

Always comply fully with the Anti-bribery and Anti-corruption laws of the countries where we do business, including the U.S. Foreign Corrupt Practices Act (FCPA), Mexico's Federal Anti-Corruption in Public Contracts Law, and any similar laws in other locations where we operate. Regardless of local practices, personal interest, or competitive intensity, you must avoid even the appearance of bribery, kickbacks, and corruption in connection with the Company's business. For more information, see our Anti-Bribery and Anti-Corruption Policy.



Third parties

We hold our agents, partners, consultants, and other third parties who conduct business on our behalf to the same high standards we hold ourselves. Make sure:

- They don't have a history of illegal or corrupt behavior.
- Our contract with them should be clear about the work to be done, specific about compensation, and outlines their responsibility to comply with this provision of our Code.
- When applicable, third parties will be required periodically to provide the Company with a certification of Compliance with all applicable laws, including FCPA, in the jurisdiction where the services will be performed.
- You exercise the proper oversight. Make sure work is proceeding according to the contract and never turn a "blind eye" toward their activities.

The Company will conduct due diligence process on third party suppliers, vendors, agents, banking institutions, or any others that meet specified risk profiles as required in the vendors due diligence management procedures established in your region.

If you have any question related with third party due diligence procedures, you may contact the Legal or Regulatory Compliance Department.

Recordkeeping

As a publicly traded company, we are required to keep accurate books that reflect all transactions (foreign and domestic, whether material or immaterial) and records so that payments are honestly described and Company funds are not used for unlawful purposes. You have a responsibility to accurately record and report all payments or other benefits provided to foreign officials and maintain compliance with anti-bribery and anti-corruption internal policy and laws.



5.2 Preventing money laundering

Money laundering is the process by which funds generated from criminal activity, such as drug trafficking, are moved through legitimate businesses to hide their criminal origin. The U.S. and other countries have enacted laws against money laundering that prohibit businesses from accepting or processing proceeds of criminal activity. Refer to our Anti-Money Laundering Policy for more detailed information and to ensure compliance with these laws.

Take steps to prevent inadvertent use of our business activities and never knowingly facilitate money laundering. Identify and carefully watch for red flags or warning signs that may indicate money laundering or other illegal activity or violations of Company policies. We count on you to be vigilant and exercise good judgment when dealing with customers or business partners and to immediately report any unusual or suspicious activities.

To comply with federal law, it is crucial that you read the Anti-Money Laundering Policy and participate in annual training.

Failure to comply with the applicable laws could result in misuse of our business for criminal purposes, regulatory fines, and reputational risk.

Q&A

There is a customer who comes in our store and extends her loans each week with large payments of cash, all of which are below the \$10,000 currency threshold. She says she can only make payments up to \$9,999. Should I notify someone of these transactions?

Yes. Anytime a transaction feels suspicious, you should report it. In this kind of situation, it's best not to say anything to the customer, but instead immediately contact the Legal or Regulatory Compliance Department and report it.

5.3 Economic Sanctions

We comply with all economic sanctions programs administered by the United States through the Office of Foreign Assets Controls (OFAC) and any other jurisdiction in which we conduct business. Economic sanctions programs are generally intended to prevent companies from doing business with certain countries, organizations, and individuals engaged in terroristic activities or narcotics trafficking. You are prohibited from conducting business with countries, governments, entities, and individuals identified by an applicable economic sanctions program. Contact the Regulatory Compliance Department if you know or suspect a violation with an economic sanctions program.

5.4 Fair competition and antitrust

The U.S. and other countries have adopted laws prohibiting or regulating monopolies, cartels, and transactions or relationships that could limit full, fair, and open competition. These laws apply to business practices of dominant companies, agreements, and dealings between competitors or others that limit competition and mergers and acquisitions. The Company has developed due diligence procedures that detail activities to ensure entities are reviewed prior to a merger or acquisition and that we are following applicable competition-related legal requirements.

You must compete fairly and vigorously in compliance with applicable laws, merger and acquisition due diligence processes, and any other applicable Company policies and procedures.

Antitrust or “competition” laws are complex, and the penalties can be severe. In general, you should not communicate or conspire with competitors to control prices or divide market share, harm suppliers, or limit sales.

Q&A

A competitor has asked me about splitting up sales territories. He’s offered to service clients in areas where our product and services don’t sell too well, which would free me up to better focus my efforts in other, more promising

Yes. Splitting sales territories may be beneficial for you and your competitor but not for your customers. This kind of arrangement would violate antitrust laws.

Be especially careful when interacting with competitors in connection with benchmarking or while attending seminars or industry or trade association meetings. To avoid even the appearance of a competition-limiting agreement, never discuss with competitors such things as prices, territories, customers, product lines, service offerings, volumes, costs, profits, market share, business strategies, salaries, hiring practices, distribution methods, or relationships with suppliers.

Gather information about our competitors only from public sources and through customer feedback. Don’t knowingly gather or use confidential information about our competitors – especially if you know it was obtained inappropriately or is subject to confidentiality obligations.

Refrain from unjustifiably disparaging or criticizing our competitors’ products or services.

5.5 Third party intellectual property

Intellectual property, such as trade secrets and confidential information, unique ideas and inventions, creative works, and trademarks are valuable assets. We protect our intellectual property and respect the intellectual property of others.

Do not copy, share, or modify third-party copyrighted materials unless you or the Company has first obtained written permission from the copyright holder. Improper use of copyrighted material, whether for business, personal, or internal Company use, can subject you and our Company to possible civil and criminal penalties and other serious consequences.

Comply with our obligations under non-disclosure agreements entered into with customers, suppliers, and business partners.

Ask yourself: Am I doing everything I can to safeguard confidential information?

Honor confidentiality obligations you may have to others such as former employers, and don't encourage others to share confidential information they may have.



5.6 Environmental protection

We are committed to protecting the environment. Make sure you comply with all applicable environmental laws and regulations. You are also encouraged to practice recycling where available and be proactive in recycling and reducing consumption of water, energy, and other resources.

5.7 Political contributions and activities

You are encouraged to be a responsible citizen and participate in civic and political activities, as long as those activities are lawful and appropriate and are conducted on your own time and at your own expense. Do not use Company funds or assets, including facilities, equipment, or trademarks in connection with your personal political activities or interests. Use care not to give the impression that we support or endorse any candidate, campaign, or issue with which you are personally involved, and be sure to comply with local policies and directives regarding soliciting or distributing materials to Team Members during work time or in the workplace. Some conditions, restrictions, limitations, or requirements may be placed on personal political contributions, and it is your responsibility to know your obligations by reading the Anti-Corruption and Anti-Bribery Policy.

Remember that as an employee of the Company you should not engage in or run for a government position, as it can result in a potential conflict of interest, without obtaining prior approval as described in the Anti-Corruption and Anti-Bribery Policy.



Can I use Company computers and copy machines to print flyers to support a local political candidate?

No. Using Company resources to support a political party or candidate violates Company policy and may also violate the law.

Our Legal Department is responsible for coordinating our Company's activities with government officials and policy makers in compliance with applicable laws. You must not make any contributions on the Company's behalf, engage in lobbying, or communicate with public officials regarding Company-related policy matters or claim to represent the Company with policy makers except as authorized or directed by the Legal Department and as described in the Anti-Corruption and Anti-Bribery Company Policy.

If you have any question related to political contributions and activities, contact the Legal or Regulatory Compliance Department or the Ethics Hotline.





5.8 Charitable contributions and volunteerism

We are committed to community involvement. We make charitable contributions consistent with our giving goals and encourage Team Members to support their communities where they live and work through appropriate volunteer activities.

Many Team Members volunteer their time, talents, and energy to support charitable causes and non-profit organizations.

Any Team Member may individually make charitable contributions to institutions of their choice. However, if the contribution is made with Company funds or on behalf of the Company, Team Members are prohibited from using the name of the Company or associating the Company's branding without first receiving written approval from the Company's Board of Directors or the Chief Executive Officer.

We are proud of your generous spirit and encourage these kinds of activities, provided they do not conflict with our Company's interests or reflect negatively on us. Be sure to comply with local policies and directives regarding engaging in volunteer activities and soliciting or distributing to Team Members during work time or in the workplace.

It is important for you to remember that under no circumstance may a Team Member, directly or indirectly through a third party, make charitable donations to government officials or entities that are controlled by such persons on behalf of the Company.

Through the EZCORP Foundation, we make contributions to certain qualified non-profit organizations. As a Team Member, you may receive requests for charitable contributions from the Company. All such requests should be forwarded to our Corporate Communications Department.

If you question whether a charitable contribution is appropriate, you may contact our Corporate Communications, Legal or Regulatory Compliance Department, or contact the Ethics Hotline.



Our Values in Action

- Don't offer or accept bribes. Avoid even the appearance of anything improper.
- Understand what is meant by the term "money laundering" and watch out for situations that suggest something illegal.
- Promote full, fair, and open competition. Be ethical in gathering competitive information.
- Safeguard the intellectual property entrusted to us by others.
- Conduct business in an environmentally responsible manner.
- Know that the Company supports your commitment to making a positive difference through political and charitable activities. Be sure to comply with local policy and directives related to these activities and take care to ensure they don't interfere with the time and energy you bring to the Company.

Related Policies and Further Guidance

[Anti-Bribery and Anti-Corruption Policy](#)

[Anti-Money Laundering Policy](#)

[Office of Foreign Asset Control Policy](#)

[Acceptance of Goods Policy](#)

[Firearms Handling and Transactions Policy](#)

[Confidential and Proprietary Information Policy](#)

[Solicitation and Distribution Policy](#)

[Community Involvement tab on EZ Store](#)



A Final Word

Thank you for reading EZCORP's Code of Conduct. We hope you find it useful in guiding your behavior and decisions as you carry out your daily activities. Refer to it whenever you have a question regarding ethics or compliance. Additional information about our compliance policies and procedures can be found on our intranet site. You may also contact your Human Resources Manager or the Legal or Regulatory Compliance Department with any questions or concerns. Don't forget, the Ethics Hotline is available to you if you know or suspect violations of the Code of Conduct or company policy.

Resources

Helpful

If you have a question, wish to discuss a personal situation, or need to report a possible violation of our Code or Company policies, discuss it with your manager or supervisor or contact one of the following resources for assistance.

General Counsel	1-800-873-7296 ext. 3409 512-314-3409 legal@ezcorp.com
Legal Department	1-800-873-7296 ext. 3465 512-314-3465 legal@ezcorp.com
Audit Committee of the Board of Directors	Chair of the Audit Committee EZCORP, Inc. c/o Legal Department 2500 Bee Cave Road Bldg. 1, Ste 200 Rollingwood, Texas 78746
Regulatory Compliance Department	1-800-873-7296 ext. 1910 512-314-1910 compliance@ezcorp.com
Ethics Hotline	(800) 558-8896 ezcorp.ethicspoint.com
Human Resources	hrservices@ezcorp.com
Manager of Diversity and Inclusion	diversity@ezcorp.com
Internal Audit Department	1-800-873-7296 ext. 1905 512-314-1905
Accounting Department	accounting@ezcorp.com
Manager of Corporate Communications	1-800-873-7296 ext. 2526 512-314-2526
Vice President of Asset Protection	1-800-873-7296 ext. 5864 512-314-5864

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The Company reserves the right to change or amend the Code of Conduct at any time, with or without notice, at the sole discretion of the Company's management. In case of any discrepancies between the Code of Conduct and the policies in the Company Policy Manual, the policies will govern.