

# Environmental, Social & Governance

## Policy

### CEO MESSAGE

Novatti is committed to environmental and social responsibility. As a growing company, we have commenced the journey to develop an Environmental, Social, and Governance (ESG) program, which we will continue to strengthen, including developing a more formal framework. Novatti acknowledges the constantly evolving social and sustainability requirements and its responsibility to provide transparent reporting against these requirements to all our stakeholders. Ongoing formalization will enable Novatti to identify, assess, and manage those ESG areas that are most relevant to our business.

Novatti is also committed to running our business in an ethical manner. The company acknowledges and embraces our regulatory and business responsibilities given the importance of the services it provides to the public. Our business is subject to a complex set of laws, regulations, and industry requirements in various jurisdictions globally. These include, but are not limited to, financial services, consumer protection, anti-money laundering, and counter-terrorism financing, privacy and data protection, taxation, employment, corporate regulation, and corporate governance.

In addition to the regulatory landscape, Novatti has developed a sophisticated ecosystem that leverages Technology, licenses, Partnerships, and our Team to deliver its services.

In all jurisdictions in which Novatti operates, we are focused on operating our business in a responsible and fully compliant manner.

### ENVIRONMENTAL

Sustainability is a journey. It starts with looking inward at how we can minimize the potential negative impacts of our operations to reduce our carbon footprint and waste. The adaptation of our office environments through the global COVID-19 pandemic has led to reductions in our energy usage, use of consumables, business travel, and office waste. We have formally adopted a hybrid working framework and a reduced office footprint which enables lower carbon emissions. The People Experience team plays a pivotal role in championing environmental sustainability initiatives across our global footprint. From office recycling programs to promoting eco-conscious practices among our employees, our People Experience team continues to be a driving force behind our sustainability journey. By integrating sustainability into our daily operations and company culture, we not only aim to reduce our environmental footprint but also inspire change in the communities that we service.

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The nature of Novatti's business, driven by our people and the various digital offerings, means that Novatti is not a significant consumer of energy or water. However, as we further develop our formal framework, we will be considering these areas from the perspective of monitoring and improving usage.

### **SOCIAL**

The Novatti Board acknowledges that our people are at the core of who we are. This is why we place them at the center of our Ecosystem to deliver on our Vision.

### **OUR VISION**



Novatti enables businesses to **pay and be paid**, from any device, anywhere. From corner stores and startups to global organisations, our solutions will unlock your ambitions

### **OUR VALUES**

Novatti places a strong emphasis on recruiting and retaining talent that enhances our values-driven culture. The accumulation of our collective experience, shared values, and individual skills allows Novatti to deliver on its vision. The values that empower our people are:

## Policy

### Values

Novatti



Start with  
'yes'

Unlocking the ambitions of our team and clients starts with a positive mindset



We've  
got your  
back

Novatti is one, connected team. Together we celebrate our success and turn mistakes into shared learnings. By embracing each team member, we unlock their ambitions, Novatti's, and those of our clients



Act with  
purpose

We are deliberate in what we do to focus our energy and deliver the best possible outcomes for our team and clients



Integrity  
always

With integrity we develop stronger relationships with our team and our clients



Keep it  
simple

Simple things are understood. By keeping it simple, we avoid confusion, achieve alignment, and in turn achieve great things together

### OUR WORKFORCE

Novatti's workforce has grown and diversified as we have matured as a business and will continue to do so. Novatti does not have any enterprise agreements - all team members are employed on above award common law contracts.

Novatti has adopted a Diversity Policy to assist it in attracting, developing, and retaining people who are highly competent and can contribute to its long-term success and values by bringing a broader range of perspectives, experience, and ideas.

Our Diversity Policy includes the provision of Equal Opportunity and Non-discrimination which is backed up by the Whistleblower Policy and its procedures.

#### Our Diversity Profile

The Company has set a diversity objective by 2025 to have 30% or greater female representation in the total workforce, in senior roles, and on the Board of Directors.

The Company has set a diversity objective by 2030 to have 40% or greater female representation in the total workforce, in senior roles, and on the Board of Directors.

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When Novatti established these diversity objectives, it was cognisant that achieving them is influenced by many factors including:

- The need to hire the best-qualified person for the available job as established by the Company's Diversity Policy
- Changes in the number of people employed due to expansion or reduction in future business activities of the Company
- Changes in the composition of the workforce due to resignations, redundancies, or terminations.

As of 30 June 2024, Novatti's employees in a full-time and part-time capacity included 40 % female (2023 – 39%) and 60% male (2023 – 61%).

Novatti considers a senior role as one which is on or reporting to the Executive. As of 30 June 2024, three females (2023 – five females) held a senior role.

During 2023 the Company had one female on the Board as an independent non-executive director prior to her resignation in December 2022. On 30 June 2024, the company had not yet replaced this Board member resulting in no women represented on the Board (2023 – 1).

## HEALTH AND WELLNESS

The health and safety of our team members and contractors is a high priority for Novatti. There have been no work-related accidents at Novatti in the last five years. This is a testament to our secure working environment and commitment to our team's health and well-being. Novatti prioritizes employee well-being by offering initiatives and activities that cover mental health, physical fitness, and financial stability, alongside a flexible work structure that empowers our team members to achieve a work-life balance that suits their needs. Ensuring a holistic approach ensures that our team members thrive both personally and professionally aligning to our values and corporate responsibility.

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### GOVERNANCE

The Novatti Board acknowledges that it is accountable to shareholders and must ensure that the Company is properly managed and protected to enhance shareholder value by ensuring the long-term strength of Novatti's business. Novatti recognizes that its reputation is a valuable asset, which is based largely on the ethical behavior of the people who represent the Company. Novatti has established a Code of Conduct which outlines how it expects its people to not only comply with the law but also to conduct themselves in a manner consistent with community and corporate standards.

Novatti has established various statements and policies to support this Code of Conduct including:

- Board Charter
- Statement of Values
- Corporate Governance Statement
- Anti-Bribery and Anti-Corruption
- Risk Management, Internal Compliance and Control
- Whistleblowing
- Procedures for Selection and Appointment of Directors
- Performance Evaluation for Directors and Executives
- Director Skills Matrix
- Remuneration of Directors and Executives
- Audit
- Continuous Disclosure
- Shareholders Communication
- Securities Dealing by Directors and Employees

In respect to our People, Novatti has also established various policies, including, but not limited to:

- Diversity
- Employee Incentive Scheme

These policies are all available on Novatti's website at <https://novatti.com/corporate-governance/>.

In addition to public-facing policies, Novatti has an internal Intranet for staff providing a suite of policies, procedures, and templates for use by our teams.

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These include, but are not limited to the areas of:

- Human Resources
- Information Technology
- Operational
- Marketing
- Risk & Compliance
- Legal
- Anti-Money Laundering

### **BUSINESS ETHICS**

Acting ethically is critical to Novatti's reputation and business. We have a strong culture of risk and compliance throughout our business. To maximize the protection available to our customers we invest in banking relationships; systems and security; fraud protection; and our processes, people, and systems.

Novatti has adopted a Code of Ethics, which details the underlying values to be applied to support the integrity of its business. This Code operates alongside Novatti's Anti-Bribery & Anti-Corruption policy, Anti Money Laundering Requirements, Modern Slavery Policy, and the overarching Code of Conduct. Novatti has also implemented a Legal & Regulatory Compliance Policy Statement which provides details of the overarching governing principles of Novatti's approach to compliance, along with the underlying principles to support the elements of an effective compliance program.

### **DATA PROTECTION AND INFORMATION SECURITY**

Novatti places paramount importance on data protection and information security. We certified our information security management system to the ISO 27001:2013 standard which ensures effective cybersecurity risk management. This uplift and investment reflects our commitment to global information security standards, proactive risk mitigation, and continuous improvement. Additionally, we employ a "Defence in Depth" strategy to safeguard data, creating multiple layers of protection. Our multi-layered cybersecurity defense system includes network security, access controls, data encryption, employee training, incident response plans, penetration testing, and 24x7 security monitoring.

Data security and information protection are embedded in our operational practices and ensure a secure environment for both data and systems.

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### **MOVING MONEY SAFELY**

As a business that moves significant monies for customers around the world every day, it is critical that Novatti manages its risks in a way that maintains the trust of our customers, partners, and banks, and meets the expectations of regulators. We have a strong culture of risk and compliance, with particular emphasis on the responsibility that Novatti has as an international and domestic money services provider to help prevent and detect financial crime.

We look forward to seeing our ESG framework develop and strengthen going forward to the benefit of all our stakeholders.