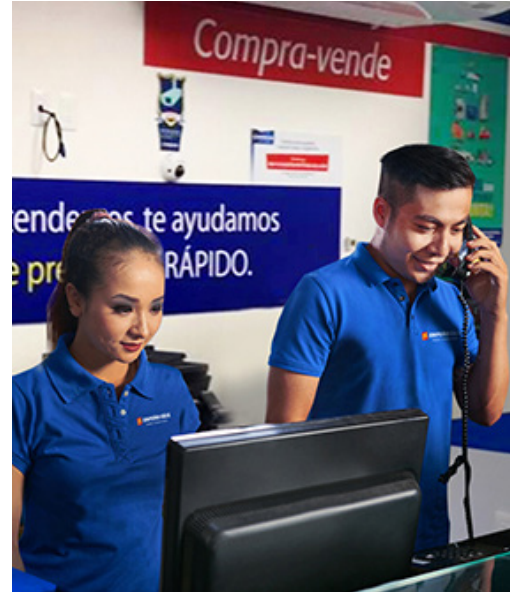


EZCORP[®]

PEOPLE · PAWN · PASSION



Code of Conduct

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 not only that our Company complies with the law, but also 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**.

Each of us has an obligation to adhere to the Code of Conduct in our daily activities. Please take a moment to read the Code of Conduct. 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.

Table of Contents

Our ETHICAL Framework.....	4
Our Code of Conduct.....	5 – 6
What We Expect/What We Prohibit	7
Our Commitment to One Another, Our Team Members	8 – 10
Speak Up	
Prompt Response to Concerns	
Retaliation Prohibited	
Respond to Investigations	
Discrimination and Harassment Not Tolerated	
Promote Belonging	
Commitment to a Safe Workplace	
Fair and Lawful Compensation	
Our Commitment to Shareholders and the Marketplace	11 – 14
Compete Vigorously and Lawfully	
Comply with Laws	
Maintain Accurate Records	
Prevent Theft and Fraud	
Avoid Conflicts of Interest and the Perception of Conflicts	
Engage Responsibly with Customers, Vendors, Suppliers, and Others	
Prohibit Bribery and Corruption	
Act Responsibly with Gifts, Meals, Entertainment, and Travel	
Respect and Protect Privacy	
Protect Confidential Information and Intellectual Property	
Responsible Use of Technology	
Uphold ESG Principles	
Our Commitment to Customers.....	15
Consumer Protection and Fair Dealing	
Non-Discrimination and Equal Credit Opportunity	
Market Accurately	
Our Commitment to Our Communities.....	16
Environmental Protection	
Political Contributions and Activities	
Charitable Contributions and Volunteerism	

Our ETHICAL Framework

At EZCORP, our Ethical Framework, which serves as the foundation for this Code of Conduct, is guided by our Mission, Values, and Guiding Principles.¹ By following them consistently, we fulfill our commitment to our customers, our Team Members, our shareholders, and our communities by operating legally and ethically in everything we do.

Our Mission

Be the First and Best Choice for Customers' Short-term Cash Needs and Quality Pre-owned Goods.

Our Values



People

We have the right people in the right place at the right time, to lead the way today and to step into greater roles tomorrow.



Pawn

We simplify our approach to business by focusing on behaviors and actions that drive positive customer and business results.



Passion

We actively collaborate as a team, celebrate our wins, communicate our efforts and motivate every Team Member to do their best every day.

Our 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



Belonging

We foster an environment that values belonging and fosters development for all



Sustainability

We positively impact the environment through our extensive network of reCommerce retail outlets

¹Affiliates within the EZCORP family of stores may adopt separate mission statements, values, and guiding principles as long as they do not contradict EZCORP's Guiding Principles.

Our Code of Conduct

The EZCORP Code of Conduct (“Code”) applies to every Team Member, including officers, directors, and those individuals working for any subsidiary of EZCORP, Inc. (the “Company”). The Code also applies to contingent workers, independent contractors, and consultants. Suppliers, vendors, and others who do business with the Company are expected to follow the same ethical standards outlined by the Code. All Team Members are responsible for knowing and following the Code. Failure to comply with the Code can result in disciplinary action, including termination.

Our Code sets out the standards of behavior expected of all Team Members and outlines our commitments to one another, the marketplace, our customers, and our communities. In short, Team Members must operate legally and ethically in everything we do. We are all responsible for:

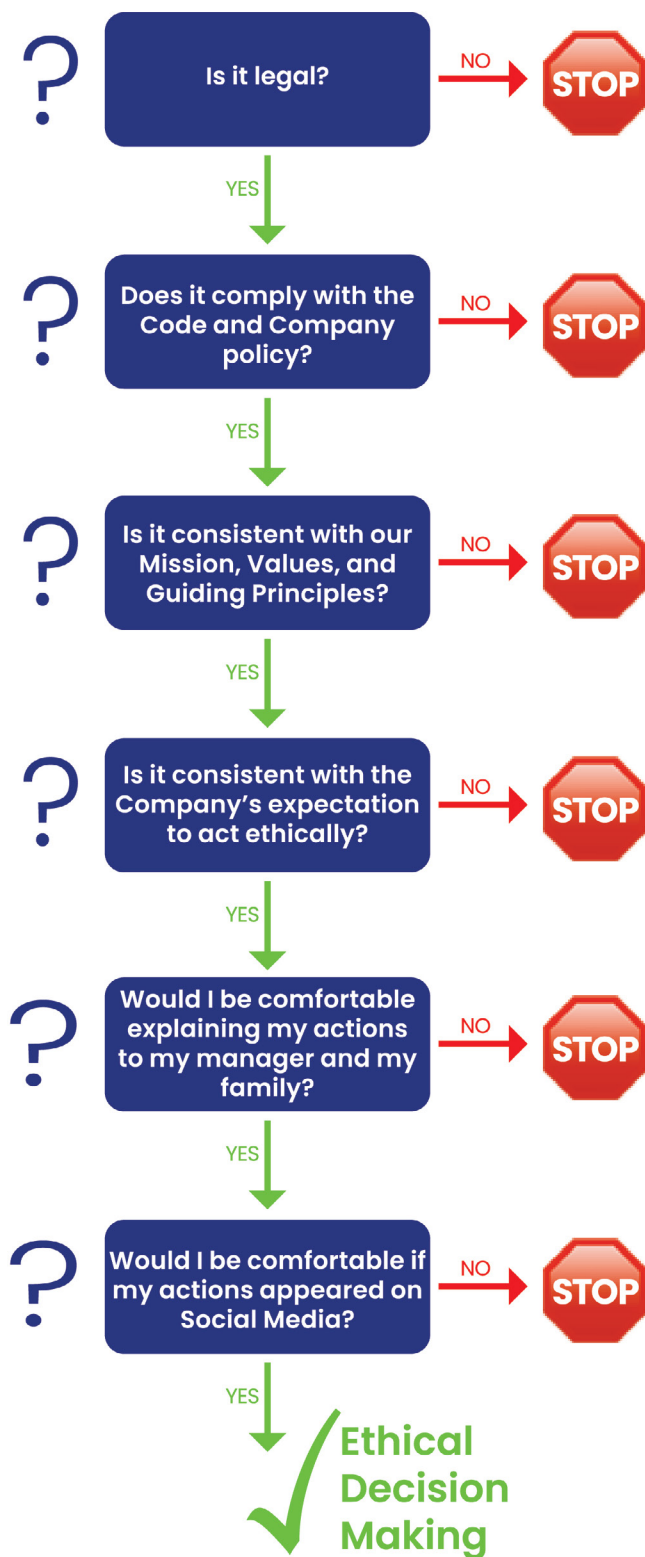
- Reading, understanding, and applying the Code and all written Company policies
- Abiding by the Code, regardless of title or geographic location
- Complying with all laws that apply to the Company
- Completing all required ethics and training courses by the assigned due date
- Never engaging agents or other third parties to circumvent the Code, Company policy, or the law
- Speaking up when we witness possible violations of the Code, Company policy, or the law



There are no exceptions to behaving ethically. There may, however, be instances when an exception, or waiver, to the Code or a Company policy is required. Only the Board of Directors can approve a waiver for a Director or the Chief Executive Officer. Only the Chief Legal Officer can approve other waivers.

Did you know? The Code prohibits practices and norms that may be common at other companies but are unlawful – e.g., facilitation payments.

To make ethical decisions consistent with the Code, ask yourself the following questions before you act and stop 🛑 if you answer 'No' to any of them.



If you have questions about the application of the Code or need guidance, ask your manager, Human Resources, Legal, or Compliance for help.

Expectations



Comply with the law, the Code, and Company policies. Our Code and Company policies are crafted to align with applicable laws and our values, regardless of local custom or accepted business practices.

Act ethically and with integrity. Our everyday behaviors should be conducted with all stakeholders' best interests in mind.

Treat others with respect and dignity. Remember the Platinum Rule – treat others the way they would want and should expect to be treated.

Demonstrate ethical leadership. We are all leaders, and our everyday behaviors should demonstrate that acting ethically and with integrity are the highest priority. It is simply not enough to comply with the Code. Everyone must be a positive role model and lead by example.

Speak up. If you suspect someone is violating the law, the Code, or Company policy, report it right away. Reports may be made to your manager, Human Resources, Compliance, Legal, or the Ethics Hotline. All reports will be investigated promptly, professionally, and fairly, and you will never be retaliated against for reports made in good faith.

The Ethics Hotline is an anonymous reporting system managed by an independent third party. You can access the hotline by phone (1-800-558-8896) or online (ezcorp.ethicspoint.com).

SMG Hotline:
report.syntrio.com/smg
English: 833-490-0007
Spanish: 800-216-1288

Prohibitions



Dishonesty. We expect honesty and transparency from all our Team Members. Dishonesty undermines trust and damages our reputation. We do not tolerate any form of lying, cheating, fraud, or deception.

Illegal Activity. We comply with all applicable laws and regulations in the countries where we operate. Illegal activity exposes us and the Company to legal risks and penalties. We do not tolerate any form of illegal activity, such as bribery, corruption, money laundering, or tax evasion.

Retaliation. We respect the right of our Team Members to report any concerns or violations of the Code, Company policy, or applicable law. We do not tolerate any form of unlawful retaliation, harassment, intimidation, discrimination, or termination.

Conflicts of Interest. We avoid any situation that may create or appear to create a conflict between our personal interests and the interests of the Company. Conflicts of interest may impair our judgment and interfere with our ability to perform our duties. We do not tolerate any form of conflict of interest.

Misuse and Theft of Assets. We protect and use the Company's assets responsibly and for legitimate business purposes. Misuse and theft of assets may result in loss of value, waste of resources, or harm to the Company's reputation. We do not tolerate any form of misuse and theft of assets, such as fraud, embezzlement, vandalism, or unauthorized use.

Our Commitment

to One Another, Our Team Members

Speak Up

Each of us is responsible for speaking up when a situation, process, behavior, or conduct is inconsistent with the Code, Company policy, or applicable law.

We have several resources available to us where anyone can speak up, ask questions, and report concerns, including:

- Through your management line
- Human Resources
- Legal and Compliance
- EthicsLine – hosted by a third party for anonymous reporting in your language. Visit www.ezcorpethics.com or scan the QR code to find country-specific reporting options, including phone hotlines.



scan for EthicsLine website

ALLEGATION

All allegations are reviewed promptly, professionally, and in a confidential manner.



INVESTIGATION

Any investigation of an allegation will be conducted in accordance with established guidelines with the goal of ensuring a fair process in which all relevant facts are considered.



ACTIONS

The Company will take appropriate action to address the findings and recommendations of any investigation into a potential violation of the Code, policy, or applicable law.

Prompt Response to Concerns

All allegations are reviewed and, when an investigation is warranted, an appropriate Team Member authorized to conduct investigations will oversee an investigation into the allegations.

Retaliation Prohibited

Retaliation will not be tolerated, including against anyone who in good faith asks a question, reports a concern, or participates in an investigation. Retaliation can include adverse action, such as changing a Team Member's responsibilities, demotion, or termination. Any potential retaliation against a Team Member must be reported immediately, as outlined in the Speak Up section above.

Good faith means you are sincere in your attempt to provide honest and accurate information, even if you are later proven to be mistaken.

Respond to Investigations

Our commitment to ethical behavior extends to our cooperation during investigations or other reviews. All Team Members are required to make good faith efforts to cooperate fully and provide truthful and complete information. Investigations will be conducted in accordance with this Code and our policies, and they will align with our principles and values. Employees who violate the Code by refusing to cooperate fully in an investigation or provide false information in an investigation are subject to disciplinary action, up to and including termination. Anyone who violates the law may also be subject to legal action with the possibility of civil and criminal penalties.



Discrimination and Harassment Not Tolerated

Discrimination is the unjust or prejudicial treatment of persons based on protected characteristics, such as race and gender, among others. Harassment is a form of discrimination and includes unwelcome conduct that is discriminatory or offensive on the basis of a protected characteristic. **We do not tolerate discrimination or harassment of any kind in our hiring practices, continued employment of Team Members, or any other aspect of employment.**

We maintain policies and provide training to instruct on what behavior is inappropriate, and we hold Team Members accountable for discriminatory actions and harassment.



Promote Belonging

We promote belonging by embracing individual differences. When every Team Member feels they have a voice and can be themselves, we can bring the Passion expected by our Team Members and customers to work every day.



Commitment to a Safe Workplace

We are committed to providing a safe workplace for all Team Members, customers, and visitors. We do not tolerate threats, threatening behavior, stalking, or acts of violence of any kind, whether express or implied.

We do not tolerate the use, possession, sale, transfer, or distribution of illegal drugs or controlled substances while on the job or on Company property (including parking lots), in Company vehicles, or otherwise on Company business.

We are committed to the timely reporting of workplace injuries and illnesses and work to remedy any unsafe workplace conditions or other violations of workplace safety rules.



Fair and Lawful Compensation

We appreciate the time, talent, and energy our Team Members devote to their work, and we are committed to ensuring they are compensated in a fair and timely manner. We comply with all applicable laws concerning pay, benefits, and working conditions.

Team Members are expected to timely and accurately report all working time without over- or under-statements. That said, Team Members must report all hours worked and will be paid for all hours worked, whether such hours were approved in advance or not.

Our Commitment

to Shareholders and the Marketplace

Compete Vigorously and Lawfully

Antitrust laws encourage free competition by prohibiting certain agreements and conduct that make it more difficult for companies to compete. Lawful competition allows us to achieve our goals ethically. To do so, we:

- Truthfully communicate about our products with customers
- Do not engage with other companies to limit hiring or recruiting of each other's employees or to set employee compensation or benefits
- Do not communicate Company confidential information externally
- Do not engage or conspire with competitors to control prices, divide market share, harm suppliers, or limit sales

Comply with Laws

We comply with all applicable laws and regulations when providing services to our customers and prospective customers around the world. Laws and regulations may impact the types of services we offer, the manner in which our services are offered, or the way in which we engage with Team Members. These regulations are often very complex and may restrict us from doing business in certain jurisdictions or with certain entities or individuals. However, a complex regulatory environment does not stop us from meeting those obligations head on and complying with the intent and spirit of the regulatory environment.



Maintain Accurate Records

We ensure the Company's books and records are complete, fair, accurate, timely, and reflect our operations and business activities. This includes internal reporting as well as external reporting, such as our public statements, statutory filings, and filings with the US Securities and Exchange Commission. We do not condone or tolerate the creation or maintenance of false records.

Examples of conflicts of interest: make business decisions influenced by family friends; ownership interest in a supplier or competitor; outside employment that interferes with your obligations to the Company; gifts from suppliers

Prevent Theft and Fraud

We do not tolerate theft or fraud. When Team Members steal or commit fraud, it damages our reputation and our brand. Any Team Member who engages in, assists, or fails to report theft or fraud is subject to disciplinary action, up to and including termination. Engaging in theft or fraud also may result in legal action taken against the Team Member with the possibility of civil or criminal penalties.

Avoid Conflicts of Interest and the Perception of Conflicts

A conflict of interest can arise when your personal, outside business, or family interests interfere or appear to interfere with your ability to make sound business decisions in the best interest of the Company. Team Members should always seek to avoid any activity that is a conflict of interest or has the appearance of a conflict of interest with the Company.

To ensure that you properly avoid a conflict of interest or the perception of one, promptly disclose any potential conflict in writing to your manager, who can assess the matter and seek guidance from Legal, if needed. Directors and Executive Management should disclose potential conflicts to the Chief Legal Officer.



Engage Responsibly with Customers, Vendors, Suppliers, and other Business Partners

We strive to maintain strong relationships of mutual respect with our customers, vendors, suppliers, and other business partners. To do so, we treat everyone fairly, honestly, and respectfully, and we expect the same in return.

We monitor our contractual arrangements and promote compliance with the Code, Company policy, and the law.

When working with vendors, suppliers and other business partners, we are committed to obtaining the best value for the materials, goods, and services we purchase. We do not engage with others who do not hold themselves to the highest standards, including compliance with laws.

Government officials:
specific rules apply when
giving to government
officials and pre-
approval is required

Prohibit Bribery and Corruption

We are committed to conducting business with the highest ethical standards and adhering to applicable anti-corruption laws in all locations where we do business. We must never offer, promise, or accept bribes or kickbacks nor participate in or facilitate corrupt activity of any kind. We do not make facilitation payments, which are small value payments made to individual government officials, to further our goals.

The Company's prohibition against offering, promising, or paying bribes or facilitation payments applies to third parties acting on behalf of the Company.



Act Responsibly with Gifts, Meals, Entertainment, and Travel

We must use Company funds responsibly, including when used for business travel, and other expenses. When giving or receiving gifts, meals, entertainment, and travel, we must be careful to avoid any potential or actual conflict of interest, improper influence, or appearance of improper influence. All gifts, meals, entertainment, and travel must be:

- For a legitimate business purpose
- Open and transparent
- Reasonable and appropriate
- Accurately recorded
- Timely expensed

Respect and Protect Privacy

We seek to protect the reasonable privacy expectations of Team Members, customers, vendors, and others with whom we do business. We comply with the applicable privacy requirements in the jurisdictions in which we operate and take deliberate steps to protect personal data.

Protect Confidential Information and Intellectual Property

All internally derived business information belonging to the Company should be treated as confidential information and kept secure at all times, whether electronically or in physical form. We must carefully maintain and manage the Company's intellectual property rights, including trademarks, copyrights, licenses, patents, and trade secrets.

Intellectual property you create during the course of your employment with the Company belongs to the Company. You must promptly share any innovations or inventions you create with your manager so steps can be taken to protect these valuable assets.

Responsible Use of Technology

We use technology, including artificial intelligence, as a tool to enhance our products and services, improve our efficiency and quality, and create value for our customers and shareholders. We are committed to using technology responsibly, ethically, securely, and in accordance with applicable law, as well as our core values and policies.

We respect the privacy and dignity of our customers, Team Members, and partners, and we do not use technology to harm, discriminate, or manipulate them. We ensure that our technology solutions are transparent, accountable, and fair, while protecting the data and interests of our stakeholders. We also seek to mitigate any potential risks or negative impacts of our technology use, and we report any issues or concerns promptly and honestly.



Uphold ESG Principles

We adhere to the environmental, social, and governance (ESG) principles that guide our business decisions and actions. We strive to reduce our environmental footprint, support social causes, and promote good governance practices. We do not tolerate forced labor or support child labor in any of our operations or supply chains. We respect human rights and labor standards, and we foster a culture of belonging in our workplace.

Our Commitment

to Customers

Consumer Protection and Fair Dealing

We comply with all applicable laws promoting consumer protection and prohibit unfair, deceptive, or abusive acts or practices. Our products and services are designed to comply with all applicable regulatory requirements where offered, and we take steps to ensure any changes to them meet this high standard.

We do not take unfair advantage of customers through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. All customers and prospective customers are served by Team Members committed to upholding the regulatory requirements and safeguards in place to avoid any unfair advantage over a customer.



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, sexual orientation, gender identity, veteran status, age, or any other status or characteristic protected by the laws in the locations 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 financial services to customers on a fair and equal basis in compliance with fair lending laws and other regulatory requirements.

Market Accurately

We represent the Company's products and services fairly and accurately. We do not use misleading or false statements in advertising or sales materials when marketing products and services, nor do we make illegal or untruthful claims.

Our Commitment

to Our Communities

Environmental Protection

We are committed to protecting the environment, and we do so by complying with all applicable environmental laws and regulations and taking deliberate steps to being good stewards of our limited resources. We practice recycling, where available, and are proactive in reducing waste and consumption of water, energy, and other resources.



Political Contributions and Activities

Team Members are encouraged to be responsible citizens and participate in civic and political activities, as long as those activities are lawful and ethical, conducted on your own time, and at your own expense. You are not permitted to use Company funds or assets, including facilities, equipment, technology, or trademarks in connection with your personal political activities or interests. Take special care to avoid giving the impression that the Company supports or endorses any candidate, campaign, or issue with which you are personally involved. Additionally, some conditions and restrictions may be placed on personal political contributions.

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.

Contributions made with Company funds or on behalf of the Company may only be made with express, written approval of the Chief Legal Officer.

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***Thank you for your
commitment to maintaining
EZCORP's ethical standards.***

**Code of
Conduct**

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