

Motor Fuel Group – Fraud Policy - June 2026

POLICY PURPOSE

Motor Fuel Group (MFG or the Company) has a zero-tolerance approach to fraud. MFG employees are required to act with honesty and integrity at all times. This policy applies to Motor Fuel Limited and all subsidiary and parent companies of Motor Fuel Limited. MFG is the trading name of the Group.

The purpose of this Policy is to:

- Assist employees to understand what fraud is and its consequences.
- Provide guidelines for employees on what to do when fraud is suspected.
- Provide guidelines for the conduct of investigations into fraud.
- Promote consistent organisational behaviour by providing guidelines and assigning responsibilities.

SCOPE OF POLICY

This policy applies to all employees, officers and directors of MFG.

In addition, MFG expects that the following will comply with the principles in this policy and act with honesty and integrity at all times: all owners, consultants, suppliers, contractors, contract managers, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with MFG.

WHAT IS FRAUD?

Fraud is a crime. A person commits fraud if they do any of the following with the intention to gain something or to cause someone else (including a company) to suffer a loss:

- (a) Make a dishonest statement;
- (b) Dishonestly withhold information; or
- (c) Dishonestly abuse a position of trust where they are supposed to protect someone else's financial interests.

A person can commit fraud even if no gain or loss actually happens, as long as they intended to cause a gain or loss.

The types of conduct covered by this policy include (but are not limited to):

- Any dishonest or fraudulent act (as described above);
- False accounting – dishonestly making an incorrect accounting or business record;
- Tax fraud – dishonestly evading tax or otherwise cheating the tax authorities;
- Making false or misleading statements to customers, contract managers, owners, regulators or insurers;
- Making false statements in advertising or marketing materials;
- Misappropriating MFG's funds, securities, supplies, or other assets;
- Impropriety in the handling of money or financial transactions;
- Profiting as a result of insider knowledge of company activities;
- Disclosing confidential and proprietary information to outside parties;
- Disclosing to other persons securities activities engaged in or contemplated by the company

- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; or
- Any similar or related irregularity.

OTHER IRREGULARITIES

Irregularities concerning an employee's moral, ethical, or behavioural conduct should be resolved by departmental management and Human Resources. Also see the Anti-Harassment and bullying policy, Disciplinary and capability procedure and Grievance procedure.

If there is any question as to whether an action constitutes fraud, contact the HR Director or Chief Finance Officer (CFO) for guidance.

CONSEQUENCES OF FRAUD

The consequences of fraud include (to the extent committed by an MFG employee) the potential prosecution of individuals, termination of employment (see Termination, below), financial loss for MFG and/or its customers, and damage to MFG's reputation.

If someone commits fraud to benefit MFG or one of its customers, then under English law, MFG itself could be prosecuted for failing to prevent that fraud, unless it can show it had reasonable procedures in place to prevent the fraud. MFG can also be prosecuted for fraud committed by its Senior Managers.

FRAUD RISK MANAGEMENT

All MFG employees and officers, regardless of their job positions, are responsible for helping to prevent fraud and to protect MFG and its customers.

Management is responsible for putting in place reasonable controls to detect and prevent of fraud, misappropriations, and other irregularities.

Each member of the management team will be familiar with the types of improprieties that might occur within their area of responsibility and be alert for any indication of irregularity.

HOW TO REPORT SUSPECTED FRAUD

MFG employees are expected to raise concerns about any suspicion of fraud at the earliest possible stage. This includes fraud by another employee, a Senior Manager, or any third party with a business relationship with MFG (such as a contractor or supplier).

An MFG employee who discovers or suspects fraudulent activity should report their concerns at the earliest opportunity by doing one of the following:

- Contacting your line manager. The line manager should then report the employees' concerns (on an anonymous basis if requested) to the HR Director or CFO.

- Contacting the HR Director or CFO.
- Making a whistleblowing report. MFG's whistleblowing policy applies to reports of suspected fraud. A copy of the policy with details on how to make a report can be found on the MFG website.

If the person making the report of suspected fraud requests to remain anonymous, MFG will keep the identity of the reporter confidential, to the extent possible. The identity of the reporter will only be disclosed to those persons that need to know for the purposes of managing or conducting the investigation. In certain circumstances, MFG may need to disclose the identity of the reporter, including if required to do so by law.

The reporter will not suffer any negative consequence as a result of raising a genuine fraud concern (even if the concern is not substantiated). If the reporter feels that they have suffered any negative consequence, this should be reported to the HR Director or CFO, who will take such concerns seriously.

The reporting individual should not:

- Contact the suspected individual in an effort to determine facts or demand restitution.
- Discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Company's solicitors or the investigating team.

INVESTIGATION RESPONSIBILITIES

The investigation process will follow MFG's Process for Investigating a Whistleblowing Claim.

All those involved in an investigation must treat all information received as confidential, to the extent possible.

The Finance and HR Departments are responsible for reporting to the Audit Committee on a quarterly basis on internal investigations. The Audit Committee is responsible for reporting to the Board on internal investigations and the effectiveness of MFG's fraud prevention controls.

TERMINATION

If an investigation results in a recommendation to terminate an individual (if employed by MFG), the recommendation will be reviewed for approval by the designated representatives from Human Resources and the Company's legal advisors before any such action is taken. The decision to terminate employment of an MFG employee then resides with the HR Director and at least one member of the Executive Team.

Should the CFO or HR Director believe the management decision inappropriate for the facts presented, the facts will be presented to the CEO or Board for a decision.

ADMINISTRATION

The **HR Director** is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.