



CODE OF BUSINESS CONDUCT AND ETHICS

OVERVIEW

This Code of Business Conduct and Ethics (this “**Code**”) of CURO Group Holdings Corp. and its subsidiaries (“**we**” or the “**Company**”) sets forth the guiding principles by which you, your colleagues and other representatives of the Company must conduct business with customers, business partners, vendors and each other. The Code is designed to promote:

- our corporate values;
- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely and understandable disclosure in the reports and documents the Company files with, or submits to, the Securities and Exchange Commission (the “**SEC**”) and in other public communications made by the Company;
- compliance with applicable governmental laws, rules and regulations;
- the protection of the Company’s assets, including corporate opportunities and confidential information;
- the deterrence of wrongdoing;
- fair dealing practices;
- the prompt internal reporting to the appropriate person of violations of this Code; and
- accountability for adherence to this Code.

While it does not cover every issue that may arise, this Code outlines basic principles to guide you in your business conduct.

This Code is not a contract of employment for a definite term or a guarantee of continued employment. You are expected to comply with all the Company policies, including those contained in the Employee Handbook. Failure to follow this Code could result in disciplinary action, up to and including termination of employment or relationship with the Company. If you violate this Code, it may also be a violation of the law and could result in civil or criminal penalties for you, the Company management and/or the Company.

SCOPE

This Code has been adopted by the Board of Directors and applies to every director, officer and employee of the Company wherever located. In addition, other persons performing services for the Company may be subject to this Code by contract or other agreement including, but not limited to, contractors, consultants and temporary employees. These persons are referred to throughout this Code as “**you**” and “**individuals.**”

This Code is based on our corporate values:

| Corporate Value | What it Means to You |
|---|---|
| <i>Winning with Integrity</i> | We compete hard and do what is right |
| <i>Thriving on Change</i> | We embrace change from a proactive stance with flexibility and responsiveness |
| <i>Building Relationships Based on Trust, Honesty and Respect</i> | We approach all people with openness and candor |
| <i>Executing with Urgency and Passion</i> | We move fast with a sense of excitement and an entrepreneurial spirit |
| <i>Keeping our Commitments</i> | We walk our talk and do what we say we will do |
| <i>Leading with Humility</i> | Check your ego, best idea wins. Ours is a shared success |

Every director, officer and employee of the Company is required to be familiar with the Code. Your failure to adhere to this Code or applicable law is subject to appropriate disciplinary action by the Company (up to and including termination), could give rise to significant criminal or civil penalties for you and/or the Company, and could negatively impact the Company’s business. Any suspected or actual knowledge of a Code violation or applicable law must be immediately reported as described below.

This Code does not prohibit your compliance with applicable laws and regulations, including those that address whistleblower protections. This Code applies to you even if you have signed an agreement or have another arrangement under which you have agreed not to disclose the Company’s confidential or proprietary information.

CODE PRINCIPLES – HONEST AND ETHICAL CONDUCT

It is the Company’s policy to maintain the highest ethical standards and comply with all applicable laws, rules and regulations that affect our business. Because the Company conducts business internationally, we must also abide by the applicable laws of countries in which we operate. We

believe that adherence to this Code will ensure our continued success as well as earn and maintain the confidence of our customers, business partners, vendors and communities in which we live. This Code has been established under the following general principles:

1. the Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically.
2. Each director, officer and employee must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company's customers, business partners, vendors, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job.
3. You must comply with this Code; failure to do so could subject you to disciplinary action which may include termination of employment or relationship.
4. You have a duty to report all suspected violations of the Code or other potentially unethical behavior by anyone, including officers, directors, employees, agents, customers, subcontractors, vendors and contractors. Please refer to "Reporting Concerns" below for information on reporting violations of the Code.
5. If you manage employees, you are accountable for your own conduct and the conduct of those reporting to you. You also are expected to inform employees reporting to you about this Code and take all necessary steps to ensure compliance with this Code.
6. No individual has the authority to direct, participate in, approve or tolerate any violation of this Code by anyone.
7. If you have questions about the application of this Code, please consult with the Chief Human Resources Officer or Chief Legal Officer.

This Code cannot anticipate every issue. Situations in the workplace may occur where the proper course of action may not be clear. You are expected to use good judgment and if something seems unethical or improper, or if you are in doubt about the best course of action in a particular situation, you are encouraged to talk to your supervisor or manager, a Human Resources representative or a member of the Legal Department.

CONFLICTS OF INTEREST

Definition

A "conflict of interest" occurs when an individual's private interest interferes in any way—or even appears to interfere—with the interests of the Company as a whole. A conflict of interest situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to objectively and effectively perform his or her work for the Company. Conflicts of interest also arise when an employee, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position with the Company. Loans to, or guarantees of obligations of, such persons are of special concern.

Disclosure

Full and timely disclosure of potential or actual conflicts of interest is critical and can help foster resolution of actual conflicts. You are expected to discuss with your supervisor or manager any affiliation, interest or other matter that presents a real, apparent or potential conflict of interest.

You are also expected to promptly and fully disclose in writing to your supervisor or manager any potential situation that may involve a conflict of interest.

Examples of Potential Conflicts of Interest

If you are not a director or executive officer, you must obtain approval from the Chief Human Resources Officer or the Chief Legal Officer before engaging in any activity, transaction or relationship that might give rise to a conflict of interest. If you are a director or executive officer, you must obtain prior approval of potential conflicts of interests exclusively from the Chairperson of the Audit Committee, who will consult with the Chief Legal Officer.

Potential conflicts of interest include, but are not limited to:

1. Receiving (you or a family member) an improper personal benefit, a loan or a guarantee of obligations as a result of your position with the Company.
2. Being employed (you or a family member) by, or acting as a consultant to, a competitor or potential competitor, vendor or contractor, regardless of the nature of the employment, while you are employed with the Company.
3. Having ownership (you or a family member) of 5% or more interest in any outside enterprise that does or seeks to do business with or is a competitor of the Company.
4. Hiring or supervising family members or closely related persons.
5. Serving as a director, officer, partner, consultant or in a managerial or technical capacity with an outside enterprise that does or is seeking to do business with or is a competitor of the Company.
6. Acting, for compensation or other personal or financial gain, as a broker, finder or go-between or otherwise for the benefit of a third party in transactions involving or potentially involving the Company or its interests.
7. Having an inappropriate personal interest, financial interest or potential gain in any the Company transaction.
8. Participating in any other arrangements or circumstances, including family or other personal relationships that might dissuade you from acting in the Company's best interest.

CORPORATE OPPORTUNITIES

Personally taking opportunities that properly belong to the Company or are discovered through use of corporate property, information or position is an improper conflict of interest. You may not (a) take for yourself opportunities that are discovered through the use of corporate property, information or position; (b) use the Company property, information or position for personal gain; and (c) compete with the Company. You owe a duty to the Company to advance our legitimate interests at all times.

GIFTS AND BUSINESS COURTESIES

Business gifts and entertainment are courtesies designed to build good working relationships and goodwill with vendors, business partners and others. However, gifts are not appropriate if they create an obligation, put you in a situation where you appear to be biased or are given with the intent to influence a business decision. The Company's policy on gifts and entertainment is simple: you cannot offer, give or receive anything that would compromise—or appear to compromise—your ability to make fair, impartial and balanced business decisions. If you are unsure whether a gift is appropriate or not, seek and document approval from your manager before accepting or giving a gift.

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Obedying the law, both in letter and in spirit, is a fundamental obligation we must respect in all of our activities. Each of us must obey the laws of the cities, states and countries in which we operate. Although you are not expected to know the details of all these laws, it is important that you have a working knowledge of the relevant laws and regulations that apply to your responsibilities. From time-to-time, the Company will hold information and training sessions to promote and facilitate compliance with laws, rules and regulations. You are expected to attend these sessions. When in doubt about applicable laws or regulations, seek advice from supervisors or the Legal Department.

Regulatory Compliance

The Company operates in a highly-regulated environment. The agencies that regulate the Company's business include, but are not limited to, the Consumer Financial Protection Bureau in the U.S. and many other federal, state, local and provincial agencies. You must comply with the regulatory requirements of these agencies, and are expected to take an active role by being knowledgeable about all applicable laws and regulations, attending trainings and responding to requests for information. Furthermore, you are encouraged to immediately report regulatory violations, suspected regulatory violations or potentially harmful or dangerous conditions to the Chief Legal Officer.

Anti-Corruption Laws

As a U.S. company with international operations, the Company must comply with the Foreign Corrupt Practices Act and the Canadian Proceeds of Crime (Money Laundering) and Terrorist Financing Act. You are prohibited from engaging in any form of bribery. Offering, soliciting or accepting anything of value, directly or indirectly, that is given with the intent to obtain or retain

services is prohibited other than gifts and business courtesies of de minimis value. You should contact the Chief Legal Officer with any questions about whether a particular gift or payment is improper.

Fair Competition

Fair competition laws, including U.S. antitrust rules, limit what the Company can do with another company and what the Company can do on its own. Generally, the laws are designed to prohibit agreements or actions that reduce competition and harm consumers. Neither the Company nor you may enter into agreements or discussions with competitors that have the effect of fixing or controlling prices, dividing and allocating markets or territories or boycotting suppliers or customers.

Export Control, Anti-Boycott and Embargo Laws

Every individual shares responsibility for compliance with U.S. statutes and regulations pertaining to: (a) export of controlled products, services and technology; (b) U.S. sanctioned boycotts of other countries, and the requirement not to participate in prohibited boycotts; and (c) transactions with prohibited parties. You should contact the Chief Legal Officer with any questions about embargo, boycott and customer screening.

BUSINESS PRACTICES

In our business operations, we deal fairly with our customers, colleagues and stockholders. We maintain accurate business records and comply with laws and regulations regarding financial disclosures and audits.

Financial Disclosures

the Company is committed to providing full, fair, accurate, timely and understandable disclosure in reports and documents that we file with, or submit to, the SEC and other regulatory agencies and in other public communications we make. You are required to comply with the Company's policies and procedures for compiling such disclosures and ensuring that they are full, fair, accurate, timely and understandable. If you contribute in any way to the preparation or verification of the Company's financial statements and other financial information, you must ensure that the Company's books, records and accounts are accurately maintained. You must cooperate fully with the Company's legal, accounting and internal audit departments, as well as the Company's independent public accountants and outside counsel. If you are involved in the Company's disclosure process, you must: (a) be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and (b) take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

Conduct of Audits

Neither you nor any other person acting under your direction shall directly or indirectly take any action fraudulently to influence, coerce, manipulate or mislead any internal, independent or

certified public accountant engaged in an audit or review of the Company's financial statements. You may not offer future employment or other inducements, provide an auditor with inaccurate or misleading information, threaten to cancel existing non-audit or audit engagements if the auditor objects to the accounting practices, seek to have a partner removed from the audit engagement because the partner objects to the Company's accounting practices, or engage in any other coercive activity to influence or interfere with an auditor's performance of audit services.

Record-Keeping

We require honest and accurate recording and reporting of information to maintain the integrity of our business records and to make responsible business decisions. The Company's books, records and accounts must (a) accurately reflect all transactions and all other events that are the subject of a specific regulatory record-keeping requirement; (b) be maintained in reasonable detail; and (c) conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" transactions or assets are prohibited unless permitted by applicable law or regulation. Business records must not contain exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies. This applies equally to e-mail, instant messaging, internal memoranda, formal reports and all other forms of business records. You are responsible for the accuracy of your records, time sheets and reports. Expense reports must accurately document expenses actually incurred in accordance with the Company's policies. You must be familiar with the Company's Records and Information Management Policy and always retain or destroy records in accordance with such policy. In the event of litigation, governmental investigation or the threat of such action, you must comply with any legal hold communicated by the Legal Department regarding any potential legal hold suspending the destruction of relevant records.

Fair Dealing

We compete fairly and honestly, seeking competitive advantages through superior performance and never through unethical or illegal business practices. You should respect the rights of and deal fairly with the Company's customers, vendors, competitors and other employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts or any other intentional unfair-dealing practice.

CONFIDENTIAL INFORMATION AND COMPANY ASSETS

Protection and Proper Use of Company Assets

Each of us has an obligation to safeguard the Company's assets, protect them from loss and ensure their efficient use. Theft, carelessness and waste can have a negative impact on the Company's profitability. Any suspected misuse, loss or theft should be immediately reported to your manager or to the Chief Human Resources Officer or Chief Legal Officer. The Company equipment should not be used for non-the Company business, though incidental personal use may be permitted. You should ensure that the Company property under your control is properly used for legitimate business purposes and protected by adequate controls and safeguards.

Confidentiality

Our obligation to protect the Company assets extends to confidential information entrusted to us by the Company or our customers in accordance with laws, regulations, contracts and applicable policies. You must not use any confidential or proprietary information of the Company for personal gain or to benefit any party other than the Company. Confidential information is non-public information that could be useful to the Company's competitors or be harmful to the Company or its customers if disclosed without authorization. This includes personal account information of customers as well as intellectual property, business, marketing and service plans, databases, account or financial records, salary information and any unpublished data and reports. You should always consult with the Legal Department before disclosing such information, even if you believe disclosure might be authorized. You should also refer to our Corporate Communications Policy which details who within the Company is authorized to speak on behalf of the Company.

You are also responsible for identifying and labeling confidential information with the appropriate classifications. The obligation to preserve confidential information extends to information of a third party who has a relationship with the Company received under nondisclosure restrictions and continues even after your employment or relationship with the Company ends.

Insider Trading

United States and international securities laws prohibit certain transactions involving securities (e.g., purchases or sales of the Company's stock, exercise and sale of the Company stock options) by persons who are aware of material information that is not generally known by or available to the public. These laws also prohibit persons who are aware of material non-public information from "tipping," which means disclosing this information to others. In addition to possible fines and penalties to you, the Company's reputation and prospects could suffer and our brand could be impaired if these laws are not followed. You may not purchase or sell the Company stock while in possession of material non-public information regarding the Company, nor may you purchase or sell another company's securities while in possession of material non-public information regarding that company. It is against the Company's policies and illegal for you to use material non-public information regarding the Company or any other company to: (a) obtain profit, or (b) directly or indirectly "tip" others who might make an investment decision on the basis of that information.

You must review the Company's Insider Trading Policy, a copy of which can be requested from the Legal Department. Additionally, you can contact the Legal Department to learn more about material, non-public information, prohibited transactions and trading windows.

REPORTING CONCERNS

We are each responsible for living by our corporate values. Acting with integrity means that we hold ourselves and our co-workers to the standards set forth in this Code and adhere to all applicable policies and laws. If you become aware of a violation of this Code or any applicable policy or law, you have a duty to report it. That includes situations in which your supervisor or manager requests that you do something illegal or improper, because there is never any excuse for not doing the right thing.

You may report your concerns anonymously or by identifying yourself. The procedures to report

any known or suspected violations of (a) accounting, internal accounting controls and auditing matters; (b) laws, governmental rules and regulations; or (c) the Company policies are set forth in the Company's Whistleblower Policy. You may use any of the avenues discussed in the Whistleblower Policy to report your concern.

WAIVER OF THE CODE

In extremely limited circumstances, we may find it appropriate to waive a provision of the Code. All waivers require the approval of the Chief Executive Officer and the Chief Legal Officers. Only the Board of Directors or a committee of the Board comprised only of independent directors may waive compliance with the Code for executive officers or directors. We will promptly disclose publicly as required by applicable law, regulations or stock exchange rules any waiver of the Code.