24 June 2026
ASX Announcement

Response to ACCC Proceedings

Australian technology and debt collection provider Credit Clear Limited (ASX: CCR) ("Credit Clear" or "the Company") advises that the Australian Competition and Consumer Commission (**ACCC**) has commenced proceedings against ARMA Group Holdings Pty Ltd (**ARMA**), and Force Legal Pty Ltd (**Force Legal**) wholly owned subsidiaries of the Company.

The proceedings allege contraventions of the Australian Consumer Law in relation to debt collection communications from 6 February 2022 to 26 September 2025, sent to certain consumers by ARMA and Force Legal. It is also alleged that for that period, ARMA was knowingly concerned in, or aided and abetted Force Legal's contraventions of the *Australian Consumer Law.*

The Company's Position
Credit Clear, ARMA and Force Legal deny the allegations of contraventions of the Australian Consumer Law and intend to defend the proceedings.

ARMA and Force Legal have cooperated with the ACCC throughout its investigation and will continue to engage constructively through the Court process. The ACCC is seeking a range of remedies, and it is not yet possible to determine any financial implications arising from the proceeding.

Mr. Allan Myers AC KC has been engaged by ARMA and Force to act in the proceedings.

The Company, ARMA, and Force Legal take compliance with the Australian Consumer Law and their regulatory obligations very seriously and place a strong emphasis on building trust with all stakeholders, including clients, consumers, regulators, and the broader community.

The Company continually invests in compliance training, systems and processes to ensure the highest standards.

ARMA's Resolve Policy is focused on empathy, ethical collections, and constructive engagement. Chief Executive Officer, Andrew Smith, said, *"Our business exists to help creditors recover what is lawfully owed to them. We can and must do this in a manner that fully respects the rights and well-being of consumers. These are not competing objectives; they are complementary ones."*

The Company's stakeholders are encouraged to direct any queries to the Company's dedicated communications team (details overleaf). The Company remains operational and continues to deliver for its clients.

This ASX announcement was authorised for release by the Board of Credit Clear Limited.

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About Credit Clear

Credit Clear Limited is an Australian technology company that has developed a digital billing and communication platform that helps organisations drive smarter, faster, and more efficient financial outcomes by changing the way customers manage their repayments through a user experience that the market demands in a digital age, powered by award winning artificial intelligence.

Credit Clear manages customer accounts across a range of industries including transport, financial services, insurance, government, and utilities. The Company is based in Australia with headquarters in Sydney and offices in Melbourne, Brisbane, Adelaide, and Perth.

www.creditclear.com.au