

Pushpay internal restructure to transfer intellectual property from Pushpay New Zealand to Pushpay USA

Auckland, New Zealand | Redmond, Washington; Colorado Springs, Colorado; Plano, Texas, US – 11 May 2022 (NZT)

Pushpay Holdings Limited (NZX:PPH | ASX:PPH, Pushpay or the Company) advises that the Pushpay group of companies (the Group) is intending to enter into an internal restructuring transaction in which it will transfer intellectual property from a New Zealand Pushpay subsidiary to a USA Pushpay subsidiary.

The intellectual property was developed during the initial years of Pushpay's business and formed the foundation of the Pushpay Group. Over the past few years, with over 98% of the Group's operating revenues coming from the US, there has been a progressive shift in the location of the Group's management and support functions from New Zealand to the US.

This fundamental shift has required the Group to review its existing international transfer pricing arrangements and as a result of this review, it is intended to transfer the intellectual property from a New Zealand subsidiary, Pushpay IP Limited to a US subsidiary, Pushpay USA Inc.

Pushpay has proactively engaged with the New Zealand Inland Revenue via the lodgment of an application for a binding ruling on key aspects of the transaction and remains committed to meeting its tax obligations in all jurisdictions. Subject to final bank approval, it is expected that the transaction will be effected within the next few months.

The costs of this transaction will be included in both the 2022 and 2023 financial years, and are excluded from Underlying EBITDAF. Financial consequences of the transaction are expected to include an average reduction in the Group's income tax expense of greater than US\$7 million annually for a number of financial years, primarily due to the tax treatment of intellectual property in the US.

It is intended to be an internal restructuring transaction with non cash consideration being by way of a share transaction between the subsidiaries. As such, this would not involve any external party and no external funding would be required. It will have no impact on employment or location of staff. The transaction price will be determined following independent expert valuation advice from KPMG in both New Zealand and the US.

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This announcement is authorised by Graham Shaw (Chairman) and Molly Matthews (Chief Executive Officer) of Pushpay Holdings Limited.

About Pushpay

Pushpay provides a donor management system, including donor tools, finance tools and a custom community app, a church management system (ChMS), and video streaming solutions to the faith sector, non-profit organisations and education providers located predominantly in the United States (US) and other jurisdictions. Our leading solutions simplify engagement, payments and administration, enabling our Customers to increase participation and build stronger relationships with their communities.

Church Community Builder and Resi Media LLC (Resi) are subsidiaries of Pushpay Holdings Limited. Church Community Builder provides a Software as a Service (SaaS) church management system that churches use to

connect and communicate with their community members, record member service history, track online giving and perform a range of administrative functions. Resi is a high growth SaaS company that provides end-to-end live video streaming solutions enabled by hardware products predominantly to the faith sector, whilst also servicing commercial, nonprofit organisations and education providers in the US.

Pushpay is an award-winning company. For more information visit www.pushpay.com/investors/awards.

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