



## ANTI-BRIBERY & ANTI-CORRUPTION POLICY

July 2017

### 1. INTRODUCTION

Redbubble Limited and its subsidiaries companies (collectively “Redbubble”) are committed to compliance with all applicable anti-bribery and anti-corruption laws and regulations, including the Criminal Code Act 1995, (Commonwealth of Australia) and the United States Foreign Corrupt Practices Act 1977. Redbubble sets high ethical standards for **Redbubble Personnel** (i.e. directors, executives, staff and contractors) in accordance with its [Code of Conduct](#) and has adopted this Policy to specifically promote full compliance with applicable anti-bribery and anti-corruption laws and regulations.

### 2. PROHIBITION AGAINST BRIBERY AND CORRUPTION

Redbubble strictly prohibits Redbubble Personnel from engaging in or tolerating any form of bribery or other corruption.

“Bribery or corruption” for this purpose means:

- (i) the offering or providing (or authorising the offer or provision) of anything of value directly or indirectly, in cash or non-cash, to or for the benefit of any third party to obtain or retain business or to secure any advantage for Redbubble or any Redbubble Personnel or their affiliates; or
- (ii) the receiving (or authorising the receiving) by any Redbubble Personnel of anything of value directly or indirectly, in cash or non-cash, from any third party to obtain or retain business or to secure any advantage for the third party or their affiliates.

The prohibition of bribery under this Policy also includes:

- (i) the offering or providing of (or the agreement to offer or provide) anything of value to a third party; or
- (ii) the request or acceptance of (or the agreement to accept) anything of value from a third party;

either:

- intending that, in consequence, a function or activity should be performed improperly (whether by the requestor/acceptor or another person); or
- where the request, agreement or acceptance itself constitutes the recipient's improper performance of a function or activity; or
- as a reward for the improper performance of a function or activity (whether by the recipient or another person).

### **3. GIFTS AND ENTERTAINMENT**

The Company has separately provided Redbubble Personnel with guidelines on the giving or receiving of gifts or entertainment to external parties. If Redbubble Personnel are in any doubt as to the appropriateness of any gift or entertainment, they should consult a member of the Redbubble legal team before it is given or accepted or otherwise as soon as possible.

### **4. REPORTING / CONSULTATION**

Any Redbubble Personnel who believes that a violation of this Policy has been committed or is being planned, should report the matter immediately to a member of the Redbubble legal team or via the Redbubble whistleblower service.

If any Redbubble Personnel are unsure whether a particular act constitutes bribery, or has any other queries, they should likewise consult a member of the Redbubble legal team.

Redbubble prohibits retaliation against anyone reporting such suspicions. Any Redbubble Personnel who wish to raise a concern or report another's wrongdoing, or who have refused pressure to either accept or offer a bribe, should not be worried about possible repercussions. Redbubble encourages openness and will support any Redbubble Personnel who raises genuine concerns in good faith under this Policy.

### **5. REPORTING**

Redbubble Personnel are encouraged to report any suspected breach of this Policy to the General Counsel or Company Secretary.

All suspected breaches of this Policy will be thoroughly investigated. If a breach is found to have occurred, disciplinary action and potentially dismissal will result. If the breach is also a criminal matter, the police or appropriate authorities will be notified.

### **6. ADMINISTRATION AND REVIEW OF POLICY**

This Board adopted this Policy on 26 July 2017.

This Policy is available on the Redbubble Investor Centre website: [shareholders.redbubble.com](https://shareholders.redbubble.com).

The Company Secretary will be responsible for the administration of this Policy.

This Policy may be amended by resolution of the Board. The Audit and Risk Committee will review this Policy at least annually and, if considered appropriate, will make recommendations to the Board in relation to amendments.