



## ANTI-BRIBERY & ANTI-CORRUPTION POLICY

### 1. INTRODUCTION

Redbubble Limited and its subsidiaries (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 United States Foreign Corrupt Practices Act. 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 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.

The prohibition of bribery under this Policy also includes 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 is 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. 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 is 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**

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. This Policy was last reviewed in February 2021.

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