Welcome to Redbubble!

Redbubble’s purpose is to create and inspire new ways of experiencing connection and a sense of belonging for every person.

Our vision is to be the most loved place at the intersection of expression, empowerment, and commerce - bringing every person the very thing that gives them joy.

“I am proud to be a part of Redbubble, all Bubblers including our directors, officers, employees, affiliates and contractors are striving to meet our high standards and to always do the right thing. We are consistently faced with choices, decisions and judgment calls that need to be made and this often is not easy. Our Code of Conduct is here to help you always act in Redbubble’s best interests. Welcome to the team.” Anne Ward, Chair of Redbubble

Here we have both Values and Behaviours:

Our Values are Creativity, having a passion for the creative and treasuring the Artists on our platform and Compassion, respecting Diversity and Inclusion in all its forms and treasuring each other.

Our Behaviours are:

- **Be Bold, Aim High** - Set ambitious objectives and support all Bubblers to aim to deliver them. This is about setting stretch objectives but never taking unnecessary risks without proper vetting, planning and mitigation.

- **Right Thinking, Right People, Right Time** - For every piece of work or meeting, consider who are the best people to be involved at that time and ensure they are involved from the start. It isn’t about being prepared to seek other views when you are not sure but also not always involving everyone.

- **Proactively Solve for the Greater Good** - Developing solutions in a scalable and sustainable way for Redbubble and not ourselves. It involves calling out issues if and when you see them, speaking up when you disagree and escalating issues when you need to.

- **Rapidly Deliver Value** - Having a sense of urgency in delivering improvements that create value. It isn’t rushing through and not questioning when something seems wrong or unfinished.

- **Have Trust, Build Trust** - All Bubblers always engage on the assumption of good intent and provide a safe environment for each other. Importantly we don’t want Bubblers to stay silent or feel they can’t question something they don’t understand.

“At Redbubble the Values and Behaviours, are important to us as they define our culture and the way we do things. There are lots of ways to get the job done but respecting our Values and aligning yourself to the Behaviours means you are doing things the Redbubble way.” Mike Ilczynski, Group Redbubble CEO
While the Code of Conduct is a great resource, it doesn't cover every situation you may face, so ask us, your manager, the People and Culture Team, one of our Legal Counsel or an Executive, if you are ever unsure about the right thing to do.

The objectives of the Code of Conduct are to provide a benchmark for professional and ethical behaviour throughout Redbubble; support Redbubble's business reputation and corporate image within the community; protect its stakeholders, and make directors and employees aware of the consequences if they breach Redbubble policy or the Code of Conduct.

The types of situations we want to draw your attention to are listed below. It is important that you make yourselves familiar with these and understand that more detailed policies are available to you on Confluence if you seek more detail about what it covers or what is expected of you.

Conflicts of interest
A conflict of interest may arise where you have a personal or commercial interest that may influence, or appear to influence, the performance of your responsibilities and duties to Redbubble. This should be avoided. It is important we help you protect yourself and Redbubble from claims of improper conduct or favouritism.

An example of a conflict of interest is being involved in selection of a supplier to provide services to Redbubble without disclosing to your manager that you have a personal relationship with one of the potential suppliers, such as the company being run by a member of your family or a friend. Another could be where you engage a company to work with Redbubble because they will reward you with financial or non-financial rewards, such as tickets to an event or a free Apple product for engaging in a contract with them.

Corporate opportunities and other benefits
You are cautioned to never use Redbubble's property, information or your position to improperly gain benefit for yourself or another party. Avoid all financial, business and other relationships which may be opposed to the interests of Redbubble.

In case you wondered, Redbubble has a strict policy not to offer secret commissions or bribes to further its business interests. Similarly, the receipt of any benefit (money or non-financial) which could be interpreted as an inducement is not to be accepted. Be cautious about accepting hospitality, entertainment or gifts which are excessive in the context of the business relationship or which may compromise your impartiality. If you receive a gift or an invitation to hospitality or entertainment that may be considered excessive, speak to your manager.

You have an obligation not to be engaged in any capacity in other work whether paid or unpaid (director, agent, employee, consultant, etc.) which may, or maybe be seen to, adversely affect the performance of your duties to Redbubble without our agreement.

Dealing with politicians and government officials
All dealings with politicians and government officials which relate to Redbubble and its business activities must have the endorsement of a member of the Executive team, CEO, General Counsel or Company Secretary. Be professional: avoid any perception of attempts to gain advantage or to improperly influence the outcome of an official decision.

Confidentiality
Confidential information is defined as non-public information relating to Redbubble's business affairs, including business strategies, marketing and sales plans, competitive analysis, financial plans and forecasts, customer or employee information, and supplier information and pricing.

Take great care to ensure the integrity and security of all of Redbubble's confidential information. You must keep confidential information acquired during your employment confidential, even after your employment with Redbubble ceases. This means you must not disclose confidential information to third parties or use it for any other purpose without the express permission of Redbubble.
parties other than as authorised by the CEO, General Counsel or Company Secretary. If you are required by any regulatory body to provide information, answer charges or face proceedings in relation to any matter arising from your employment or engagement with Redbubble, you are required to notify the General Counsel or Company Secretary without delay.

Privacy
You must respect and maintain the privacy of personal information held or entrusted to Redbubble by its clients, customers, suppliers, employees and others and comply with applicable privacy/data protection regulations (including the Privacy Act 1988 in Australia).
All personal information of Redbubble's suppliers, customers, and employees is to be treated as confidential.
Personal information is information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from that information or opinion.

Ethical and respectful conduct
You must treat others ethically and with respect in all dealings with Redbubble's artists, consumers, and suppliers.

Health and safety
Redbubble is committed to providing a safe work environment for the well-being of employees, contractors, visitors and members of the public who may be affected by our work. Redbubble ensures this by developing and maintaining safe systems of work and providing information and safety training for employees.
Everyone has a role in helping keep everyone safe. If you know of or suspect any unsafe situations or conditions, please alert your manager immediately.
Like any respectable workplace, Redbubble will not tolerate the use of illegal drugs, improper use of alcohol or prescription medicine on Redbubble's premises or when performing work for Redbubble, travelling on Redbubble business or attending work/client functions.
Employees who work from home are encouraged to check that their home environment is free from any potential health and safety issues.

Community
Redbubble is a responsible corporate citizen and actively supports its creatives and the communities in which we live and work. Redbubble encourages you to contribute to the needs of the community.

Diversity
Redbubble is committed to ensuring a diverse work environment in which everyone is treated fairly and with respect and where everyone feels responsible for the reputation and performance of Redbubble.

Equal Opportunity and Anti-Bullying
Redbubble is committed to providing a workplace free from discrimination, sexual harassment and bullying. Applicants for employment are considered based on their job-related skills, qualifications and abilities. Redbubble's equal opportunity and anti-bullying policies have the objectives of attracting and retaining the best possible employees; providing a safe, respectful and flexible work environment; and delivering services in a respectful and reasonably flexible way.

Discrimination on the basis of gender, race, religion, cultural background, colour, marital status, sexual orientation, gender identity, age, disability, personal associations, political beliefs, family responsibilities, pregnancy, membership or non-membership of a trade union is not tolerated by
Redbubble.

**Any kind of bullying, harassment or vilification in the workplace will likewise not be tolerated by Redbubble.** If you believe you are being, or have been, discriminated against, sexually harassed or bullied, please contact your manager or a member of the People & Culture team. Any complaint made will be treated as confidential.

**Protection of and use of Redbubble’s assets and property**

The protection and proper use of Redbubble’s assets is everyone’s responsibility. Any instances of suspected or actual theft or improper use of Redbubble property must be reported to the CEO, CFO, General Counsel or Company Secretary. Limited use of Redbubble property (such as computers and telephones) is permitted for private and non-income producing purposes, providing it is used efficiently and prudently.

**Compliance with laws and regulations**

You must comply with all laws and regulations relating to Redbubble. All actual or potential breaches must be immediately reported to your manager, a member of the Executive, the CEO, CFO, General Counsel, Company Secretary or Chair of the Audit & Risk Committee.

**Approach to disclosure and financial reporting**

Redbubble is committed to open and transparent communication with its shareholders and stakeholders. This includes providing timely, balanced and readily available material information to Redbubble’s shareholders, relevant regulators and other key stakeholders. Redbubble will review and monitor the controls and procedures for the preparation of its accounting records and financial statements with guidance from its auditors. Redbubble will ensure that the accounts and financial information that it provides represents a true and fair view of the financial performance and position of Redbubble.

If you have contact with Redbubble’s auditors you must fully cooperate with them and not make any false or misleading statement to, or conceal any relevant information from them.

**Insider trading**

Insider trading is a serious offence under the Corporations Act. Insider trading laws prohibit a person in possession of material non-public information relating to a company from dealing in any way in that company’s securities. Please refer to Redbubble’s Share Trading Policy for guidelines to assist you to ensure that you do not deliberately or inadvertently breach the insider trading laws.

**Whistleblower protection**

Redbubble is committed to ensuring that you can raise concerns regarding unlawful, unethical or otherwise unacceptable conduct without fear of victimisation, harassment or discriminatory treatment.

You are encouraged to report actual or suspected fraudulent or unethical behaviour—including any breach of this Code of Conduct or other Redbubble codes and policies—to your manager at first instance. If you are not comfortable reporting to your manager or the People & Culture Team, you can make a report under the Group Whistleblower Policy. Redbubble will take all reasonable steps to ensure that anyone who comes forward to report such behaviour is protected.

**Reporting a breach of the Code of Conduct**

Redbubble has two dedicated roles responsible for the administration of this Code: the General Counsel and Company Secretary. You are encouraged to report any suspected breach of this Code to your Manager or a member of the Executive team, but you can also report a suspected breach to the General Counsel or Company Secretary.
All suspected breaches of this Code will be thoroughly investigated. If a breach is found to have occurred, disciplinary action and potentially dismissal will result. If the breach is a criminal matter, the police or appropriate authorities will be notified.

This is a lot of information and we are always here to help. We operate Confluence at Redbubble and you will find all the resources you need to help you, such as policies, forms and process details.

**Links to be inserted to all resources**

Review and publication of this Code

This Board adopted this Code in August 2022.

This Code is available at [shareholders.redbubble.com](http://shareholders.redbubble.com) and the key features are published in the Redbubble Annual Report.

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