

Anti-Bribery & Corruption Policy

Zero tolerance — Australia & overseas operations

Bubbalooba Pty Ltd (ABN 15 151 030 796) trading as PO Box Designs | Version 1.0, July 2026

Zero tolerance. PO Box Designs has zero tolerance for bribery and corruption. We are committed to acting lawfully, ethically and with integrity in all our business dealings and relationships, wherever we operate.

1. Purpose & Scope

This policy applies to all directors, employees, contractors, agents and representatives of Bubbalooba Pty Ltd trading as PO Box Designs, and to our dealings with suppliers and our offshore manufacturing partner. It sets out our prohibition on bribery and corruption and our expectations of everyone who works for or with us.

Bribery is a criminal offence in Australia, including under the Criminal Code Act 1995 (Cth) and Victorian legislation, and offences can apply to conduct both in Australia and overseas.

2. What Is Prohibited

- **Bribery** — we do not offer, promise, give, request, accept or receive any bribe — that is, any financial or other advantage intended to improperly influence a business decision or reward improper conduct.
- **Secret commissions & kickbacks** — we do not pay or accept undisclosed commissions or kickbacks.
- **Facilitation payments** — we do not make facilitation or 'grease' payments to speed up routine actions, even where they may be customary in a jurisdiction.
- **Improper influence** — we do not use gifts, hospitality, donations or any other means to improperly influence a client, official or supplier.

3. Gifts & Hospitality

Modest, infrequent and customary business courtesies (such as a working meal) may be acceptable where they are reasonable, proportionate, given openly, and could not reasonably be seen to influence a business decision. Gifts of cash or cash equivalents are never acceptable. Anything beyond modest and customary must be declined or declared to the Managing Director.

Red flags. Decline and report anything that is offered in secret, is disproportionate, is linked to winning or retaining work, or involves cash. If in doubt, ask the Managing Director before accepting or offering.

4. Dealing with Public Officials & Government Work

We apply heightened care in any dealings with public officials and on government projects. Offering any advantage to a public official to influence their duties is strictly prohibited. On government work we comply with all applicable procurement rules, supplier codes of conduct and probity requirements.

5. Suppliers, Agents & Offshore Partner

We expect our suppliers, agents and offshore manufacturing partner to share our commitment to anti-bribery and corruption and to comply with applicable laws. We conduct our overseas sourcing relationships transparently and do not authorise anyone to do on our behalf what we could not lawfully do ourselves.

6. Political Donations & Sponsorship

Any political donation or community sponsorship must be lawful, transparent, and never made to secure a business advantage. Such contributions require Managing Director approval.

7. Records

We keep accurate books and records. No account, invoice or document may be false, misleading or incomplete, and no off-book funds or accounts are permitted.

8. Reporting & Protection

Anyone who suspects bribery or corruption, or is offered or asked for a bribe, must report it to the Managing Director promptly. Reports may be made in confidence. No one will suffer disadvantage for refusing to pay or accept a bribe, or for reporting a genuine concern in good faith. Additional protections apply under our Whistleblower Policy.

9. Breaches

Breach of this policy is treated as serious misconduct and may result in disciplinary action up to and including termination, termination of a supplier relationship, and referral to law enforcement.

10. Responsibilities & Review

The Managing Director is responsible for this policy and its enforcement. It is reviewed periodically and provided to staff, suppliers and principals as required.

Report a concern. To report a bribery or corruption concern, contact the Managing Director at info@poboxdesigns.com.au or 03 4333 9271.