

Code of Conduct & Business Ethics Policy

How we do business

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

Our standard. PO Box Designs is committed to conducting business honestly, ethically and with integrity in all its dealings. This Code sets out the standards of behaviour we expect of everyone who works for or with us.

1. Purpose & Scope

This Code of Conduct applies to all directors, employees, contractors and representatives of Bubbalooba Pty Ltd trading as PO Box Designs. It sets out how we expect our people to behave towards each other, our clients, our suppliers and the wider community. We also expect our suppliers and offshore partner to uphold consistent standards.

2. Our Core Values

- **Integrity** — we are honest and fair, and we do what we say we will do.
- **Respect** — we treat everyone with courtesy and dignity, free from discrimination, bullying and harassment.
- **Accountability** — we take responsibility for our work, our conduct and our commitments.
- **Quality** — we take pride in the standard of our work and stand behind it.
- **Safety** — we look after ourselves, our colleagues and the public in everything we do.

3. Standards of Behaviour

- **Comply with the law** — act in accordance with all applicable laws, regulations and contract requirements.
- **Act honestly** — be truthful in dealings with clients, suppliers and colleagues; never misrepresent our products, capability or pricing.
- **Deliver quality** — perform work to specification and to our quality standards, and raise issues promptly and honestly.
- **Respect others** — maintain a workplace free from discrimination, bullying, harassment and victimisation.
- **Protect confidentiality** — safeguard confidential and commercially sensitive information belonging to the business, clients and partners.
- **Avoid conflicts of interest** — declare any personal interest that could conflict with the interests of the business or a client.
- **Use resources properly** — use company property, funds and information only for legitimate business purposes.
- **Act safely** — follow our OHS policies and safe work procedures at all times.

4. Gifts, Benefits & Anti-Corruption

We do not offer, give, solicit or accept bribes, secret commissions or improper benefits. Modest, customary business courtesies are acceptable only where they could not reasonably be seen to influence a business decision. Anything beyond this must be declined or declared. Our separate Anti-Bribery & Corruption Policy sets out these requirements in detail.

5. Conflicts of Interest

A conflict of interest arises where personal interests could improperly influence, or be seen to influence, business decisions. Anyone who becomes aware of an actual, potential or perceived conflict must declare it to the Managing Director promptly so it can be managed.

6. Confidentiality & Privacy

We protect the confidential information of the business, our clients, suppliers and partners, and handle personal information in accordance with our Privacy Policy and the Privacy Act 1988 (Cth). Confidential information must not be used or disclosed except for proper business purposes.

7. Raising Concerns

Anyone who believes this Code has been breached, or who becomes aware of unlawful or unethical conduct, is encouraged to raise it with the Managing Director. Concerns can be raised in confidence, and no one will suffer disadvantage for raising a genuine concern in good faith. Our Whistleblower Policy provides additional protections for eligible disclosures.

8. Breaches

Breaches of this Code are taken seriously and may result in disciplinary action, up to and including termination of employment or engagement, and referral to authorities where the conduct is unlawful.

9. Responsibilities & Review

The Managing Director is responsible for this Code and for fostering a culture of integrity. This Code is reviewed periodically and updated as needed. It is provided to all staff and available to clients and principals on request.

Questions. Questions about this Code can be directed to the Managing Director at info@poboxdesigns.com.au.