

## **BLOOMICE ANTI BRIBERY & CORRUPTION POLICY**

### **Declaration**

Bloomice is committed to conducting business ethically, transparently, and in compliance with all applicable anti-bribery and corruption laws. This policy sets out the standards expected of all employees, directors, contractors, and associated persons.

### **Policy Statement**

Bloomice adopts a zero-tolerance approach to bribery and corruption.

- No employee or associated person shall:
- Offer, promise, give, request, or accept a bribe
- Engage in any form of corrupt business practice
- Facilitate improper payments to secure or retain business advantage

This applies to both public and private sector interactions.

### **Definition of Bribery**

Bribery includes:

- Offering or receiving anything of value (money, gifts, hospitality, services)
- With the intention of influencing a business decision or securing an improper advantage

Facilitation payments are strictly prohibited.

### **Gifts and Hospitality**

Reasonable and proportionate hospitality is permitted where:

- It is for legitimate business purposes
- It is not intended to influence decision-making
- It is transparent and properly recorded

Excessive, frequent, or inappropriate gifts or hospitality are not allowed.

### **Data Sharing**

Bloomice may be liable for the actions of third parties acting on its behalf so therefore all agents, distributors, and partners must:

- Comply with this policy
- Be subject to appropriate due diligence
- Operate under written agreements including anti-bribery clauses

## **Record Keeping**

Accurate and transparent financial records must be maintained at all times.

No false, misleading, or incomplete entries shall be made to conceal improper payments.

## **Reporting Concerns**

All personnel must promptly report any suspected or actual bribery or corruption.

Reports can be made to senior management or via designated reporting channels.

All concerns will be treated confidentially and without retaliation.

## **Training and Awareness**

Bloomice will ensure relevant personnel receive appropriate training to understand and comply with this policy.

## **Breaches**

Any breach of this policy may result in:


- Disciplinary action (including dismissal)
- Termination of contracts with third parties
- Potential criminal liability under applicable law

## **Responsibility**

Senior management has overall responsibility for ensuring compliance.

All employees are responsible for adhering to this policy in their day-to-day activities.

This policy is reviewed periodically to ensure ongoing compliance.



Approved by: Tony Kinsella (Director)

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