



Annual Declaration in Relation to Bloom Anti-Bribery & Corruption Policy and Procedures
For the period 1 January 2019 – 31 December 2019

Bloom has adopted a zero tolerance policy with respect to bribery and corruption. As part of the implementation of this policy, Bloom seeks to show transparency in its operations and therefore requires its staff and directors to remain vigilant in their approach to any instances of bribery.

ANTI-BRIBERY & CORRUPTION CERTIFICATION

Introduction

Bribery is a criminal offense. The Company prohibits any form of bribery. We require compliance from everyone connected with our business with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance towards corrupt activities of any kind, whether committed by the Company employees or by third-parties acting for or on behalf of the Company.

Policy

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request, or accept any bribe, i.e. gift, loan, payment, reward, or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual, or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the cessation of our business arrangement with you.

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to a Director. You may be asked to give a written account of events.

Staff is reminded of the Company's whistle blowing policy.

Gifts and hospitality

We realize that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry. This does not constitute bribery where it is proportionate and recorded properly.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from a Director. Similarly, neither gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from a Director.

A record will be made of any instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

In accordance with the policy:

- (a) I confirm that I am not aware of any improper acts that might be construed as a bribe for or on behalf of Bloom or that I have reported any such acts;
- (b) I confirm that I have notified a Director with details of all gifts or hospitality, received or given, in accordance with the attached anti-bribery policy.

NAME: _____

SIGNATURE: _____

DATE: _____