

Booktopia Consumer Law Compliance Policy

Purpose

This policy outlines Booktopia Group Limited's ("Booktopia")'s commitment to comply with its obligations under the Competition and Consumer Act 2010 (CCA) including the Australian Consumer Law (ACL).

Scope

This policy applies to all Booktopia Board members, directors, officers, employees, agents and contractors who perform duties for or on behalf of Booktopia (**Booktopia Representatives**).

The Australian Consumer Law

The ACL is Australia's national, state and territory law that aims to protect consumers and ensure fair trading in Australia. It applies to all business activities such as advertising, selling, supplying, sourcing, pricing and dealing with consumers in any capacity.

Some key provisions of the ACL relevant to Booktopia's business are described below:

- Booktopia must not engage in misleading or deceptive conduct;
- Booktopia must not make false or misleading representations about goods or services;
- Booktopia must not supply goods that do not comply with mandatory standards or are unsafe;
- All goods sold in Australia come with consumer guarantees and these consumer guarantees cannot be excluded or modified under the ACL. Booktopia must provide an appropriate remedy if a consumer's rights under the consumer guarantee provisions of the ACL are not met.

Booktopia's Commitment

Booktopia is committed to the observance of all laws and acting to the highest ethical standards. Compliance with the CCA is a critical element of this commitment.

Booktopia strives to be an organisation where:

- its people demonstrate commitment to compliance;
- it has useful systems and procedures to support and assist it to comply with the CCA;
- it provides effective and ongoing training on its responsibilities and obligations arising under the CCA; and
- its personnel are held accountable for their performance and their conduct.

Booktopia's Strategy for Compliance

Booktopia's commitment to meeting its obligations under the CCA includes the development, implementation and regular review and maintenance of a Consumer Law Compliance Program (**Compliance Program**).

The purpose of the Compliance Program is to ensure everyone at Booktopia understands their role and responsibility when it comes to compliance with the ACL, to guard against potential contraventions of the ACL or otherwise identify any potential areas for improvement and to provide for regular review of the Compliance Program to ensure it is fit for purpose. The Compliance Program also provides for a series of activities to improve Booktopia's understanding of its ACL responsibilities and obligations.

Key elements of Booktopia's Compliance Program are:

- the appointment of a Compliance Officer and Compliance Advisor to ensure the Compliance Program is effectively designed, implemented and maintained;
- the issuance of a Board endorsed Compliance Policy
- regular training for relevant persons on their duties and obligations under the ACL and ACL compliance training as part a new employee's induction;
- a consumer law complaints handling system;
- monthly randomised quality assurance checks of customer service staffs' interactions with consumers;
- ongoing reviews of existing customer service training materials, scripts, manuals and guidelines and of any new or subsequent versions;
- an annual review by an independent person on the continuing effectiveness of the Compliance Program.

Responsibilities

Booktopia is committed to giving its staff appropriate resources by way of systems, training, and support to enable them to meet their obligations.

Booktopia Representatives are required to:

- familiarise and comply with all aspects of the Compliance Program and make proper use of the systems, training, and support provided by the business;
- complete all required compliance training in a timely manner when required to do so;
- observe the spirit and the letter of the law and exercise high standards of ethical conduct when performing any duties for Booktopia;
- seek guidance and assistance as required to ensure they comply with their obligations;
- report any Compliance Program related issues or CCA compliance concerns to Booktopia's Compliance Officer as soon as they become aware of such a matter.

Consequences

Companies and individuals that engage in conduct in contravention of the CCA even if those contraventions are innocent or unintentional, may be exposing themselves and Booktopia to penalties and fines, damages, Court orders and other serious consequences.

Deliberate non-compliance with the CCA will not be tolerated and may result in dismissal.

Booktopia will take action internally against any persons who are knowingly or recklessly concerned in a contravention of the CCA and cannot indemnify them in the event of any liability to pay a penalty or legal costs incurred in defending or resisting court proceedings where the person is found to have such a liability in respect of that contravention.

Whistleblowing

Booktopia will not act to the detriment of any Booktopia Representative where they raise with management any Compliance Program related issues or CCA compliance concerns. Booktopia guarantees that whistleblowers with CCA compliance concerns will not be prosecuted or disadvantaged in any way and that their reports will be kept confidential and secure.

Reporting Concerns or Wrongdoing

You can contact the Compliance Officer by:

- Telephone: (+61) 1300 187 187
- Email: compliance@booktopia.com.au