

ANTI-BRIBERY & CORRUPTION

Statement of Policy

Anti-Bribery & Corruption Policy

Statement of commitment

Creative Territory Pty Ltd (“the Company”) and its consultants affirm their unwavering commitment to conducting all business activities in a manner that is ethical, transparent and compliant with applicable legal and regulatory frameworks. The Company adopts a zero-tolerance stance towards bribery, corruption and related illicit conduct.

This Anti-Bribery and Corruption Policy (“the Policy”) is established to provide comprehensive guidance to all employees, contractors, agents and stakeholders, and to ensure compliance with:

- Australian Federal, State, and Territory criminal legislation
- International standards, including:
 - ISO 37001:2025 – Anti-Bribery Management Systems
 - ICC Rules on Combating Corruption (2023 Edition)
 - United Nations Convention against Corruption (UNCAC).

This Policy forms part of the Company’s broader governance and compliance framework and shall be reviewed periodically to ensure continued relevance and effectiveness.

Scope and applicability

This Policy applies to all individuals and entities acting on behalf of or in association with Creative Territory Pty Ltd, including but not limited to:

- Employees (permanent, temporary, and casual)
- Contractors and consultants
- Directors and officers
- Third-party intermediaries (e.g., agents, suppliers, joint venture partners)
- Any other stakeholders engaged in business activities with the Company

This policy is effective as at 1 July 2025.

Prohibited conduct

In accordance with ISO 37001 and the ICC Rules, the Company strictly prohibits any form of bribery, corruption, or facilitation payments, whether direct or indirect, including but not limited to:

- Offering, promising, giving, soliciting, or accepting bribes, kickbacks or improper payments in cash or kind to influence business decisions or secure undue advantage
- Facilitation payments, defined as unofficial payments made to expedite routine governmental actions
- Creation or use of slush funds, off-the-books accounts or unrecorded transactions
- Engagement of third parties to facilitate or conceal corrupt practices
- Conspiracy, aiding and abetting or complicity in corrupt acts
- Money laundering or any conduct that may contravene anti-corruption laws or ethical standards.

Gifts, hospitality and business expenses

GIFTS AND HOSPITALITY

While the Company recognises that modest gifts and hospitality may be customary in certain business contexts, such exchanges must never be used to improperly influence business decisions or create a perception of impropriety. All gifts and hospitality must:

- Be of nominal value
- Be disclosed and recorded appropriately
- Comply with local laws and cultural norms
- Not create a conflict of interest or breach of duty.

EXPENSES

All expense claims must be legitimate, accurately documented and supported by valid receipts. Under no circumstances shall expense claims be used to disguise or facilitate bribery or other improper payments.

Governance and implementation

As the Person Conducting a Business or Undertaking (PCBU), Creative Territory Pty Ltd shall ensure:

- Compliance with all applicable anti-bribery and corruption legislation, both domestic and international
- Senior management accountability for the implementation and enforcement of this Policy
- Periodic risk assessments to identify and mitigate bribery and corruption risks
- Allocation of adequate resources to support training, monitoring, and continuous improvement
- Establishment of whistleblower mechanisms in line with ISO 37001 and ICC guidance
- Regular review and amendment of this Policy to reflect evolving legal and regulatory standards.

International standards and best practices

This Policy is informed by and aligned with the following international instruments and standards:

- ISO 37001:2025 – Anti-Bribery Management Systems: Provides a structured framework for preventing, detecting, and responding to bribery risks across all sectors
- ICC Rules on Combating Corruption (2023): Offers principles for responsible business conduct and third-party management
- United Nations Convention against Corruption (UNCAC): The only legally binding global anti-corruption treaty, emphasising preventive measures, enforcement and international cooperation.

Enforcement and reporting

Violations of this Policy may result in disciplinary action, including termination of employment or engagement, and may be reported to relevant authorities. The Company encourages all personnel to report suspected violations through secure and confidential channels, without fear of retaliation.