Creek&Pine

Anti- Bribery and Corruption Policy

1. Introduction

Creek & Pine (legal: Supernormal d.o.o, Sveti Petar Orehovec 67, 48267 Orehovec, Croatia, VAT number HR18965816268) is committed to conducting business ethically, honestly, and with integrity. This policy outlines our stance on bribery and corruption and the procedures we have implemented to prevent, detect, and address any such activities within our organization.

2. Purpose

The purpose of this policy is to:

- Set out our responsibilities in observing and upholding our position on bribery and corruption.
- Provide guidance on how to recognize and deal with bribery and corruption issues.
- Ensure compliance with applicable anti-bribery and corruption laws and regulations.

3. Scope

This policy applies to all employees, officers, consultants, contractors, trainees, interns, agents, and any other person or persons associated with Creek & Pine (collectively referred to as "employees").

4. Legal Framework

Our Anti-Bribery and Corruption Policy is based on the following key legislation:

- The US Foreign Corrupt Practices Act (FCPA)
- The UK Bribery Act 2010
- The European Union Anti-Corruption Conventions
- The OECD Anti-Bribery Convention

- Any other local anti-bribery and corruption laws applicable to our operations

5. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting something of value to influence a business outcome improperly.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payments:** Small, unofficial payments made to expedite routine governmental actions.

6. Policy Statement

Creek & Pine has a zero-tolerance approach to bribery and corruption. We will not engage in any form of bribery or corruption, and we are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate.

7. Responsibilities

- **Management:** Ensure that adequate policies and procedures are in place and that employees are aware of and understand the policy.
- **Employees:** Comply with this policy and report any suspected bribery or corruption activities.

8. Gifts and Hospitality

- Employees must not offer, give, or accept gifts or hospitality that could be perceived as an attempt to improperly influence a business decision.
- Any gifts or hospitality offered or received must be reasonable, proportionate, and in compliance with Creek & Pine's approval procedures.

9. Facilitation Payments

- Facilitation payments are prohibited under this policy.
- Employees must avoid any activity that might lead to or suggest that a facilitation payment will be made or accepted by Creek & Pine.

10. Political and Charitable Contributions

- Creek & Pine does not make contributions to political parties.
- Charitable donations and sponsorships are permitted but must be ethical and not used to gain improper business advantage.

11. Record-Keeping

- Maintain accurate and complete records of all business transactions, including gifts, hospitality, and expenses, in accordance with applicable accounting standards.

12. Reporting and Investigation

- Employees are encouraged to report any suspected bribery or corruption activities through established reporting channels.
- All reports will be investigated promptly, thoroughly, and confidentially.

13. Training and Communication

- Provide regular training to employees on anti-bribery and corruption laws, policies, and procedures.
- Communicate this policy to all employees and relevant stakeholders.

14. Monitoring and Review

- Regularly monitor and review the effectiveness of this policy and the procedures implemented to combat bribery and corruption.
- Update the policy as necessary to reflect changes in legislation or business practices.

15. Consequences of Non-Compliance

- Breaches of this policy will result in disciplinary action, up to and including termination of employment.

- Creek & Pine may also report any suspected illegal activity to the relevant authorities.

16. Contact Information

For any questions or concerns regarding this policy, please contact the Compliance Officer at hi@creekandpine.co.

Approved by: Vedran Židanik, CEO
Date: October 10, 2023