

ANTITRUST COMPLIANCE POLICY TEMPLATE

1. General rules

Our company supports fair and open competition and it is against all forms of competition law infringements. We are convinced that competition provides the best incentive for business efficiency as it encourages innovation and guarantees consumers the best choice. Competition law prohibits agreements, practices and conduct which have a damaging effect on competition, such as collusion between competitors or abuse of market power, both of which can lead to higher prices or lower output and restrict innovation and technical development. Thus we are committed to ensure effective competition and to avoid any kind of competition law infringement.

Our company, its employees, agents and business partners must not get involved in unlawful practices. In competitive business transactions we will not resort to unfair practices to the detriment of our competitors or other market players.

In order to comply with antitrust law, it has to be ensured that our company acts independently from its competitors. We understand and undertake to respect that any form of agreement (written or oral) or concerted practices (gentleman's agreement's, common understanding, etc.) between independent undertakings that aims or results the restriction of competition is strictly prohibited.

Notwithstanding the above, competition law does not exclude to possibility to interact with competitors, however any such contact should be carefully analysed in advance in order to comply with competition law. Our company undertakes to carefully manage relations with its competitors.

To decide whether a specific interaction with a competitor has competition law relevance, the following shall be considered:

- **OBJECTIVE:** What is the objective of the given interaction? Is there any legitimate reason for the meeting/cooperation with the competitor?
 - Any cooperation with a competitor shall have a clear, legitimate purpose!
- **CONTENT:** Is the given behaviour common in business? Do we share any strategic information with competitor? Can the competitor guess our strategic considerations from the information provided?
 - Commercially sensitive information, in particular business strategy shall never be disclosed to a competitor!

2. Agreements with competitors

Our company prohibits any kind of agreement with competitors, unless such agreement was analysed from competition law perspective and based on the analysis it was found compliant with competition law and was supported by the top management of our company. Violating this policy may result in severe consequences both on individual level (employment) and for the company (liability for damages, fine, and loss of reputation).

3. Information exchange

Any direct or indirect (via third parties) exchange between competitors of commercially sensitive or confidential information, such as information about prices, cost structure, sales quantities, rebates or discounts, other trading conditions, commercially sensitive information relating to their individual customers and/or suppliers, or information about commercial strategies, is prohibited. Even unilateral disclosure of strategic information by one company can be considered problematic

under competition law (this includes public announcement with the purpose to signal to the competitors).

All employees shall consider the above before sharing any information with a competitor that is not publicly available. In case of any concern regarding the sensibility of the information, the top management shall be contacted.