

Anti-Competitive Activity Policy Damex FR Ltd

1. Purpose

Damex FR Ltd is committed to fostering fair and open competition within the United Kingdom. This Anti-Competitive Activity Policy is designed to ensure that our business activities comply with UK competition laws, promoting ethical conduct and maintaining the integrity of the marketplace.

2. Applicability

This policy applies to all employees, contractors, agents, and representatives of Damex FR Ltd, including subsidiaries and affiliated entities, involved in business activities within the United Kingdom.

3. Compliance with Competition Laws

All employees and associated persons are required to comply with UK competition laws, including but not limited to the Competition Act 1998. This encompasses:

- **a.** Prohibition of Cartels: Damex FR Ltd strictly prohibits any engagement in cartels or other anti-competitive agreements with competitors. Such agreements include price-fixing, market sharing, bid-rigging, and output limitation.
- **b.** Abuse of Dominant Position: Damex FR Ltd commits to avoiding abuse of a dominant market position that may harm competition, such as predatory pricing, discriminatory practices, or exclusionary conduct.
- **c.** Anti-competitive Agreements: Employees must not enter into agreements or engage in practices that may be deemed anti-competitive, including agreements with suppliers, customers, or competitors that restrict competition.

4. Reporting Obligations

Employees and associated persons must promptly report any concerns or suspicions related to potential anticompetitive behavior to the designated compliance officer or a supervisor. Reports can be made anonymously, and Damex FR Ltd will protect whistleblowers from retaliation.

5. Training and Awareness

Damex FR Ltd is committed to providing training and resources to employees to ensure awareness and understanding of competition laws. Regular training sessions will be conducted to educate employees on their responsibilities under this policy.

6. Consequences of Non-Compliance

Failure to comply with this policy and applicable competition laws may result in disciplinary action, up to and including termination of employment or contractual relationship. Damex FR Ltd will also cooperate with relevant authorities in the investigation of potential violations.

7. Cooperation with Authorities

Damex FR Ltd will fully cooperate with any investigations conducted by competition authorities. Employees are required to provide truthful and accurate information in the event of any inquiry.

8. Review and Updates

This policy will be periodically reviewed and updated to ensure its alignment with evolving competition laws and industry best practices.