



## Antitrust and Fair Competition Policy

### Our Commitment

imza MARINE S.A. believes in fair trade and honest competition based on integrity, product quality, price and customer service. It is imza MARINE S.A.'s policy to ensure that its day-to-day business practices fully comply with the antitrust laws of each and every country it operates in. imza MARINE S.A. is committed to fully adopt these principles in all operations in which imza MARINE S.A. has management control. We will also use our influence to promote the principles in other companies where imza MARINE S.A. has ownership interests.

The consequences of breaching antitrust laws are very serious. Antitrust authorities can impose substantial fines, agreements may be void and unenforceable, public authorities can exclude infringing parties from public procurement processes and damages actions from private parties negatively affected by anti-competitive behavior is both common and costly. In addition, antitrust violations have a negative impact on a company's reputation, as well as triggering criminal liability for individuals, leading to fines, imprisonment and director disqualification in some jurisdictions. All imza MARINE S.A. employees are expected to understand and conduct their activities in strict accordance with this Policy and the antitrust laws.

### Our Safeguards

This Policy requires full and complete compliance with all applicable antitrust, competition and fair-dealing laws. Each manager and employee of the Company should endeavor to deal fairly with the Company's customers, suppliers, competitors and other employees, and should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged



information, misrepresentation of material facts or any other unfair-dealing practice.

All manager and employees of the Company are required to observe this Policy. Employees involved in marketing, sales, purchasing or contracts, or in discussions with competitors, have a particular responsibility to ensure that they understand this Policy and are familiar with applicable antitrust, competition and fairdealing laws. Because these laws are complex and can vary from one jurisdiction to another, employees should seek guidance as set under the heading “Consultation - Always Seek Guidance” whenever questions arise.

### **Red Flags**

Certain circumstances and behaviors should alert Company manager and employees to a violation of this Policy or, at minimum, to an increased risk thereof. If you are contemplating taking any action that involves any such “red flags” then, before proceeding, you should seek guidance as set below under the heading “Consultation - Always Seek Guidance”. Red flags include, but are not limited to, the following:

- entering into an agreement or understanding, no matter how informal, with a competitor concerning the price of a product or service;
- entering into an agreement or understanding, no matter how informal, with a competitor to divide or allocate markets, business opportunities, territories or customers;
- entering into an agreement or understanding, no matter how informal, with a competitor to exclude competing firms from a market;
- engaging in discussions with a competitor relating to issues and information of a sensitive, competitive nature, including, but not limited to, discussions of premiums, costs, marketing strategies, customers and other issues having an impact on competition;
- entering into an exclusive agreement with a customer or supplier; providing a discount to a customer contingent on achieving a certain market share with the customer; bundling products or services or receiving discounts for bundled products or services;

### **Consultation - Always Seek Guidance**

The above list of red flags is not exhaustive, and includes activities that may be permissible under certain circumstances. If you are in doubt about whether an activity could violate this Policy or applicable antitrust, competition or fair-dealing laws, please consult with your, manager or other appropriate personnel within the Company. If you do not feel comfortable talking to any of these persons for any reason, you should feel free to call the Legal Department. In addition, the Company has a hotline where any employee can anonymously submit questions or complaints regarding illegal behavior, including questions or complaints regarding compliance with this Policy. Submissions are confidential and are reviewed by the Legal Department.



## Changes to this policy

We may update this policy from time to time. If such updates are not material, we may make such alterations without posting a specific notice on our website. Please review this privacy policy from time to time.