

D2 - COMPETITION LAW

COMPLIANCE POLICY

Competition laws exist which in broad terms prohibit:

- anti-competitive agreements, particularly between companies that operate in the same sector of activity; and
- the abuse of dominant market positions by, for example, monopoly service providers.

Failure to comply with these competition laws can expose the Group to the risk of substantial fines, damages and other penalties. It is the responsibility of all employees to ensure that they, and those who report to them, remain at all times committed to the policy of full compliance. With this in mind certain arrangements have been formalised to help achieve this objective. These include:

- the issue of a Compliance Handbook relevant to the appropriate jurisdiction to appropriate colleagues accompanied by a Compliance Checklist;
- the holding of training sessions to enable colleagues to understand and comply with the competition rules;
- establishing monitoring and reporting systems; and
- identifying appropriate people in the Company team to support our compliance policy and provide practical advice.

If there is any doubt as to the course of action to take on a specific matter or proposal, refer immediately to the relevant manager. It is the responsibility of all directors and senior managers to ensure compliance with the law in the relevant jurisdiction. In particular, seek legal advice should be sought wherever this is suggested in the Handbook and also whenever so directed by the relevant manager.

The successful implementation of these arrangements is essential for the best interest of the Group, its employees and its shareholders. The supporting material and all guidelines issued in the future should be read carefully.