



عملات
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عملات للطباعة الأمنية
OUMOLAT SECURITY PRINTING

ANTI-TRUST POLICY

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1.0 Foreword

Oumolat Security Printing LLC values customer trust, therefore this is a fundamental factor in which Oumolat should safeguard its reputation. Complying with Anti-Trust laws throughout the world generates customer trust in Oumolat, and at the same time, protects Oumolat's reputation globally.

Oumolat has created this policy to ensure it complies with Anti-Trust laws throughout the world. Abiding by Anti-Trust rules is fundamental for creating and sustaining a competitive marketplace which ultimately benefits customers. Oumolat firmly believes that complying with Anti-Trust laws is the right thing to do for both itself and its customers.

Oumolat also supports the view that anti-competitive behavior that hinders the functioning of markets should be prohibited. Compliance with Anti-Trust laws is of key importance to Oumolat's reputation and falls within the framework of Oumolat's Code of Business Principles.

Within Oumolat, Directors, Managers, and Employees are expected to comply with all applicable Anti-Trust laws. Everyone is responsible for taking the necessary action to achieve this result and seek to avoid even the appearance of any wrongdoing. All Oumolat employees must demonstrate their awareness of Anti-Trust laws when engaging with any competitor, customer, or supplier.

To achieve this, all employees must understand the basic rules of Anti-Trust laws to ensure compliance when executing their day-to-day roles. Anti-Trust laws are complex and may vary from country to country. When applicable, Oumolat expects employees to seek guidance regarding any questions which may arise in relation to Anti-Trust compliance.

Oumolat will not tolerate any excuse for failing to seek further or legal advice when the situation requires. Oumolat expects compliance with its standard of integrity throughout the organization and will not tolerate employees who achieve results at the cost of violation of law or who deal unscrupulously.

2.0 The Basics of Anti-Trust Laws

Anti-Trust laws protect free and unrestricted competition between organizations and aid prohibiting the restriction of competition and the abuse of a dominant market position.

2.1 Relationships with Competitors

When it comes to relationships with competitors, the most severe infringements of Anti-trust law are:

- Price Fixing between competitors is one of the most serious breaches of Anti-Trust laws and is punishable by the highest levels of fines; it is also a criminal offence punishable with imprisonment in many countries. Price fixing relates to any agreement or concerted practice between competitors that restricts or aims to restrict price competition. Oumolat employees must always make decisions about pricing and commercial terms independently of competitors and must never discuss pricing or commercial terms with competitors. Market Sharing Agreements and concerted practices between competitors to allocate markets, whether by product, territory, channel, type, or size of customer, or in any other way, are illegal.
- Sales Tender Rigging (coordinating tenders) between competitors is a serious infringement of Anti-Trust law and a criminal offence in many jurisdictions. Competitors must bid independently of others. Exchange of confidential and commercially sensitive information is not permissible to exchange confidential information which may reduce or remove any degree of uncertainty between competitors in respect of current or future market conduct. Confidential information includes pricing, credits or discounts, terms of sale, capacity, production forecasts, current trading conditions, commercial strategies, identity of customers and suppliers, details of negotiations, marketing plans, etc.

2.2 Applicable Laws

Multiple countries have adopted Anti-Trust or Competition Laws. These laws have typically been developed using either the United States or European Union model for such laws. Oumolat must however comply with the Anti-Trust and Competition Laws of the countries in which they do business. However, even in a country that does not have its own competition law, there may be potential Anti-Trust risks. What applicable competition laws in any given country Oumolat intends to do business within shall be investigated to aid legal compliance.

2.3 Consequences of Infringing Anti-Trust Laws

The ramifications of breaking Anti-Trust laws are serious, both for Oumolat and individual employees.

Issues include:

- **Reputation:** Anti-Trust investigations attract significant media coverage and will damage Oumolat's reputation within the marketplace. More importantly, it will also damage customer and stakeholders trust in the organization. In addition, Anti-Trust investigations and fines can undermine Oumolat's credibility in its dealings with governmental and regulatory agencies.
- **Fines:** Breaking Anti-Trust laws may result in significant fines. In addition, individual employees may also receive serious fines because of Anti-Trust non-compliance activities.
- **Criminal Risk:** In many countries infringing Anti-Trust law is a criminal offence for individual employees. Employees involved in illegal anticompetitive practices may face prison sentences.
- **Civil Liability/Damages:** Oumolat may also be sued by injured parties for damages resulting from infringement of Anti-Trust laws.
- **Contractual Risk:** Illegal terms in a contract can lead to the offending clause or even the whole agreement being deemed void and unenforceable.
- **Internal Costs:** In addition to these penalties, the cost of defending Anti-Trust claims or investigations by the authorities can be significant in both cost and time.

3.0 Implementation, Reporting and Training

This Policy sets out minimum standards embedded within Oumolat's Anti-Trust compliance culture. The implementation of this Policy is companywide. All Oumolat employees are expected to take full responsibility for Anti-Trust compliance and ensure correct individual behavior is always achieved.

Training Oumolat employees to make sure they always comply with applicable Anti-Trust laws and monitoring compliance within the business forms an integral part of Oumolat's Anti-Trust compliance culture.

All directors, employees, consultants, and contractors of Oumolat will provide annual certification of compliance with this Policy. This will take the context of completing a self-declaration document outlining personal compliance to the Policy.

The Compliance Officer of Oumolat will be responsible for ensuring that all annual certifications are obtained on or before the end of the first 12 months of policy implementation, and for providing written confirmation to the Board of Directors that such certifications have been obtained and summarizing the results thereof.

4.0 Queries

In the event of any questions concerning how this Policy should be followed in a particular case, please contact Oumolats Compliance Officer in the first instance.

5.0 Document Control

Version Level	Details of Change	Reason for Change	Authority	Date
01	Origination	-	M. Wenzel	28.06.2022
02	Section 3	Adding of annual self-compliance aspect.	M. Wenzel	30.12.2022
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