



## ANTITRUST

### Internal Regulations – Corporate Policies

Date: November 2021

Code: PC-04-5.2-06-202111

## Introduction

Approval of the Global Dominion Access, S.A., (hereinafter “**Dominion**”) Antitrust Policy (hereinafter, the "Policy") is yet another milestone in Dominion's steadfast commitment to lawfulness, ethics and professionalism that underpins how it conducts its operations and its corporate culture.

Pursuant to this Policy, Dominion is firmly committed to:

- | Complying with and fully adhering to all current legislation (both nationally and in the countries where it operates).
- | Complying with the principles that govern its Code of Conduct which forms the basis of the Policy set out here.
- | Training and raising awareness of the Obligated Parties (as this term is defined below), as well as stakeholders, of the importance of complying with this Policy.
- | Applying penalties for non-compliance with the provisions set out herein, pursuant to the applicable disciplinary measures.

Using this Policy, Dominion intends to establish the guidelines to follow to promote free competition, establishing an in-house preventive framework that eliminates or, at least, reduces any risks of noncompetitive conduct.

## Scope of application

The Policy applies to all employees, managers and directors of all the companies that make up Dominion (hereinafter "**Obligated Parties**").

For the purposes of this Policy, "Dominion" shall also mean all companies which Global Dominion Access, S.A. controls or may control, directly or indirectly, with control being understood to be:

- (i) holding the majority of the voting rights;
- (ii) the right to appoint or remove a majority of members of the Board of Directors; or
- (iii) holding the majority of the voting rights pursuant to eventual agreements made with third parties.

Likewise, all third parties who have dealings with Dominion will also indirectly receive this document and, whenever possible, must be made aware of the underlying principles and values.

## Antitrust

Antitrust is an aspect of Law that determines restrictions relating to business conduct with respect to competitors, with a view towards maintaining a balanced market, combining freedom of enterprise, free competition, consumer collective interest and public interest.

Free competition is based on the free economic initiative of individuals, as well as other rights and freedoms such as the right to property and inheritance. State and supra-state legislation

prohibits any practices and conduct engaged in by competitors that distort competition in the different sectors of the market.

## Expected Acts of Conduct

All Obligated Parties are obliged to adhere to the following conduct practices whenever any duties or activities are carried out for Dominion:

- | Avoiding de jure or de facto market dominance or market abuse (in the latter case without any previous authorisation and consultancy).
- | Avoiding contact or meetings with competitors unless there is a legitimate reason to do so.
- | Discussing any agreements proposed by or with competitors with the Legal department so that they can identify potential competition law issues.
- | Keeping business correspondence appropriately classified and filed, avoiding any communication, written or otherwise, outside of this process.
- | The content, information and statements referring to Dominion's commercial offers must be made clear and explicit, with no double meanings or interpretations that could affect their understanding.
- | Advance knowledge of the agenda, scope and issues to be addressed at professional meetings or business events and keeping discussions and debates at such events focused only on the planned issues.
- | Keeping the content of meetings, social events, conferences, seminars, trade fairs, etc., within the parameters set out in this Policy.
- | Collecting information from public, valid and legitimate sources. Not accepting information from or relating to a competitor. Not obtaining information either unlawfully or by using deceptive means.
- | Obtaining advice regarding distribution, agency or mediation agreements and their terms and conditions.

## Prohibited Acts of Conduct

The following conduct is deemed prohibited and liable to prosecution whenever any duties or activities are carried out for Dominion:

- | Discussing, commenting on or making agreements - either in writing or otherwise - at meetings or other social events, with competitors relating to prices, discounts, the allocation of markets or quotas, restrictions on customers or suppliers and unlawful co-operation agreements.

- | Allowing access to, or disclosing confidential or other unpublished business information (such as pricing; supply costs; profitability; strategies; business and marketing plans; product development plans; customer details).
- | Discussing or entering into agreements with competitors over contract bids or procedures in response to calls for tender. References to "agreements" are not only written agreements. Agreements can either be in writing or spoken and may include not only formal but also informal agreements and activities that may arise as a result of the circumstances.
- | Fraud in tenders also includes agreements between parties to participate or not, the conditions of their bids, the setting of prices and all exchanges of information relating to the aforementioned terms made under exclusive conditions with regards to third parties.
- | Making use of a dominant market position, conditioning the sale of a product/service on the purchase of another product/service also supplied by Dominion, unless when this is legally justified.
- | To sign up to any type of association, code, declaration, etc. or participate in surveys or statistical or similar reports without prior authorisation from the officer in charge of the area of division.

## Reporting Wrongdoings

All Obligated Parties and third parties have a Whistleblowing channel to report any conduct that may involve any wrongdoing or any illegal actions or any actions that go against the Code of Conduct or Policy. For further details regarding the Whistleblowing Channel, consult the [Code of Conduct](#).

## Document sheet

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