



Anti Trust Compliance Program Guideline

Cox Group has adopted a specific anti-trust compliance program in order to make all its employees and their corresponding spheres of influence aware of its corporate compliance policy and to promote lawful and ethical conduct, trying to prevent and investigating actions and omissions that may represent a breach, and any resulting liability.

All Cox Group's employees are required to fully comply with the applicable anti-trust laws in order to ensure that the company retains the confidence of its clients and authorities, in order to protect its businesses from any breach and the resulting liabilities, thereby improving its reputation.

The conduct that is expected from employees is as follows:

Avoid contact or meetings with competitors unless there is a legitimate reason for doing so.

Discuss any agreement proposed by or with competitors, with the Legal Department, prior to starting negotiations, so it can identify potential issues related to anti-trust laws.

Avoid making statements about internal policy, market share, leadership positions, investigations and other processes related to an official or legal entity or authority.



Keep commercial correspondence duly catalogued and archived, preventing any written or other type of communication from occurring outside of this process.

Content, information and statements must be clear and explicit in order to avoid misinterpretations, omissions, etc. that could cause confusion in relation to understanding them.

Find out in advance the agenda, the scope and issues to be discussed in professional meetings or at professional events and limit discussions and debates at these events to the planned subject matters.

Maintain the content of meetings, company events, conferences, seminars, trade fairs, etc. within the parameters described in this program, terminating any conversation that goes beyond this framework, making written notes of exactly what was said and reporting this if appropriate.

Compile information from public sources and valid and legitimate resources. Do not accept information from or relating to a competitor; do not obtain information by unlawful means nor induce it to be provided.

Obtain advice for agreements on distribution, agency or intermediation, and their conditions; and agreements about mergers, acquisitions, groupings and licenses.

Avoid *de facto* or *de iure* positions of market dominance or market abuse (in the case of the latter, without the obligatory authorization and prior advice).



Conducts that are forbidden are as follows:

Discussions, comments or agreements, written or otherwise, in meetings or at other types of social gatherings with competitors, related to prices, discounts, assignments or restrictions related to markets, and/or supply sources, vetoes or boycotts of any licensee, client, competitor or supplier, illegal cooperation agreements with competitors.

To permit, look for access to, or discuss confidential or otherwise unpublished commercial information (such as prices, supply costs, profitability, strategy, business and commercialization plans, product development plans and information about clients).

To discuss or make agreements with competitors about contract tenders or procedures for responding to invitations to tenders. References to "agreements" are not just limited to written agreements. Agreements may be written or oral and not only include formal agreements but also informal agreements and activities that may be inferred from 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.

To make the sale of a product conditional on the acquisition of another also supplied by Cox Group, in circumstances in which this is not technically justified; to influence or impose resale prices; to impose discriminatory prices.

To sign up to any type of association, code, declaration, etc. or participate in surveys or statistical or similar reports without prior authorization.



If there is evidence, proof or suspicion that an Cox Group employee, competitors, clients or suppliers are breaking anti-trust laws, it must be reported in accordance with the “Whistleblower Channel” section.

Anti-trust and/or legal authorities have the power to impose very severe financial penalties for breaches of anti-trust laws, which may be equivalent to a fixed percentage of the group’s accumulated or consolidated revenues.

Despite the fact that offences under anti-trust laws do not result in criminal sanctions at the EU level, various jurisdictions, including the USA, France and the United Kingdom apply penalties in certain cases in which offences for collusive practices are a crime and anyone found guilty may be punished by a custodial sentence.