



**AFIXGROUP**  
**COMPLIANCE POLICY**

**AFIX**  
GROUP.COM



**ANTI TRUST**  
**COMPETITION**

# 1. COMPETITION POLICY STATEMENT

Afix Group stands for technological competency, innovation, customer orientation and motivated, responsible employees. These factors are the basis of our high reputation and the long-term economic success of the Group in global competition.

Antitrust violations threaten these success factors and will not be tolerated (zero tolerance). For us, cartel agreements are not a means of winning business. We would rather forgo a contract and fail to reach internal goals than act against the law.

With its Compliance Program, Afix Group has taken wide-ranging measures to ensure Compliance with antitrust regulations and the Group Policies based thereon. Violations will not be tolerated and will result in disciplinary actions against the persons concerned. All Executive Board members and General Managers, as well as other employees, in particular all senior executives, must be aware of the extraordinary risks which antitrust violations can pose for Afix Group as well as for them personally.

All employees are requested to cooperate actively in their areas of responsibility in implementing the Afix Group Compliance Program.

THE EXECUTIVE BOARD OF AFIX GROUP NV HAS THEREFORE ESTABLISHED THE FOLLOWING POLICY FOR THE GROUP

1.

The Afix Group Group expects all its employees, at all levels and regardless of their hierarchical position within the Group, to comply with the applicable competition laws and in particular the antitrust statutes.

2.

Anticompetitive agreements and concerted practices between competitors that cover prices and cost accounting, price elements, surcharges, catalogue prices, minimum prices, offer prices, allowances, division of customers, regional arrangements, quantities in production and supply, capacities or similar competitive parameters, are prohibited.

Any cooperation with competitors (including consortiums), such as joint sales and marketing, production, purchasing, or research and development is only permitted, if precise and clearly defined legal requirements are met. Such cooperation agreements may only be implemented after prior consultation of the Afix Group CEO-CFO or the legal department. This also applies to such cases in the context of trade associations, e.g., the drafting of model terms and conditions or the setting of technical standards.

3.

The participation in anticompetitive statistics, market information systems or benchmarking is prohibited. Even if such practices do not necessarily violate antitrust laws, they are in particular problematic if they contain current data on quantities or prices and allow inference about the data of the participating companies.

4.

Anticompetitive agreements between suppliers and customers are prohibited. Agreements regarding exclusive supply or purchase commitments, territorial limitations, agreements on resale prices and other limitations on customers with regard to their relationships with their own customers are either prohibited under the applicable antitrust laws or only permissible under very strict conditions.

5. Group companies that are dominant due to their high market shares in the respective geographic and product markets, may not abuse this dominant position in violation of the applicable antitrust laws. This concerns in particular any unjustified refusals to deliver, tie-in sales or abusive pricing practices.

6. In case of doubt, if a conduct could be interpreted by a third party as anti-competitive behavior ("appearance of wrongdoing"), one should refrain from such conduct. Alternatively the case has to be presented to the Afix Group CEO-CFO for review before any action is taken. Examples of critical scenarios that could be interpreted as anti-competitive behavior by third parties are provided in the guidance notes.

7. In the context of trade associations the requirements and recommendations of the guidance note on trade association activities and conduct in meetings with competitors at association meetings have to be observed.

8. The rules of conduct defined in this policy statement are specified in more detail in separate guidance notes. However, even these guidance notes cannot provide a comprehensive presentation of all possible violations of all antitrust laws worldwide. Rather, they are intended to serve as a basic guide to permissible conduct.

9. In cases of doubt about a legal situation, including the applicable market definition, the identification of market shares, the existence of actual or potential competition (both are relevant), as well as the legality of statistics, market information systems or benchmarking, the Afix Group CEO-CFO or the legal department has to be contacted.

If you have any questions on this guidance note or any other Compliance matter, please contact:

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EXPERT IN SMART SCAFFOLDING SOLUTIONS



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