

# **THE FIDI ANTI-TRUST CHARTER**

**2023**



## Anti Trust Charter

As a certified member of FIDI Global Alliance, Gil Stauffer is committed to the Anti-Trust Charter.

By committing to the Charter, Gil Stauffer and its subcontractors undertake to:

1. Never make any direct or indirect (via third parties including agents, suppliers or customers) contact with an actual or potential competitor or other third party, the object of which is to engage in cartel behaviour. A cartel is defined as any agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition.
2. Never propose or reach an agreement, whether directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issues, including:
  - Fixing prices
  - Dividing or sharing markets, customers or territories
  - Rigging a competitive bidding process
3. Report any indication or initiative or improper anticompetitive business conduct by an actual or potential competitor in accordance to your internal procedure, including but not limited to, reporting to your legal department and/or the relevant Anti-Trust authorities.
4. Not to participate in a meeting of a trade association in which sensitive competition-related issues are discussed. If such subjects are raised during a meeting, employees of Gil Stauffer must immediately ask for the discussion to end. If not, they must leave the meeting and ask for that to be noted in the minutes of the meeting.
5. Ensure that all internal and external correspondence, including e-mails and texts, and documents, discussions and public statements do not contain any statements that might be misinterpreted by third parties or Anti-Trust authorities and courts in the context of a potential Anti-Trust investigation.
6. Maintain independent judgment in pricing or selling of any products and/or services.
7. Limit any information discussed during commercial negotiations, with or disclosed to competitors or other third parties, to that which is strictly necessary for completing or assessing the transaction.