



Competition Law Compliance Policy

GLOBAL LEGAL POLICY

OEG-GLOBAL-POL-012

CLASSIFICATION: Internal

	Document Title: Competition Law Compliance Policy
	Document No: OEG-GLOBAL-POL-012
	Version: 2
	Issued Date: 19 February 2025
	Document Owner: Global Legal
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Amendment Records

Version	Date	Amendment By	Approved By	Amendment Description	Pages Affected
0	01/02/2019	SR	CAR	New Global Policy	N/A
1	04/09/2021	HP	AG	Document now in new approved format and minor adjustments made	All
2	19/02/2025	BT	LS	New format and logo only. No contextual changes.	All

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1. PURPOSE

OEG Group Limited (OEG) is committed to ensuring that all of its activities are conducted in accordance with all applicable legal and regulatory requirements and the highest standards of ethical business conduct. It is the responsibility of all OEG employees to ensure that none of OEG's businesses engage in practices which infringe legal or regulatory requirements, or which fall below the highest standards of ethical business conduct.

Any OEG employee engaging in business practices which infringe legal or regulatory requirements or fall below the highest standards of ethical business conduct may be subject to disciplinary action which may lead to dismissal and may face personal criminal or civil liability. It is the responsibility of all OEG employees to ensure that they report any infringement or suspected infringement of legal or regulatory requirements or the highest standards of ethical business conduct involving OEG to their line manager or otherwise in accordance with the OEG 'Whistle Blowing' Policy.

Our reputation, credibility and business ethics are of great importance and is the result of years of hard work by all our Employees. OEG has adopted a Zero Tolerance approach towards any breaches of this Competition Compliance Policy, an approach which is fully supported by the OEG Executive Board.

2. SCOPE

This policy applies to all legal entities of the OEG Group, joint venture companies, has a majority stake in or has overall operational control of. It is concerned with ensuring that the OEG Group complies with the competition laws of all the jurisdictions in which we operate.

3. DEFINITIONS

Competition Law - Competition law is a law that promotes or seeks to maintain market competition by regulating anti-competitive conduct by companies.

Zero Tolerance Approach - Zero tolerance is a hard-line policy preventing or protecting against something that is undesirable in a given environment.

4. REFERENCES

- Supplier Code of Ethics Policy - OEG-Global-Pol-005
- Code of Conduct - OEG-Global-Pol-011
- Competition Compliance Guide - OEG-Global-Pol-013



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5. RESPONSIBILITIES

5.1 CEO

OEG's CEO has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under OEG's control comply with it. The OEG management team has primary and day-to-day responsibility for implementing this policy, for monitoring its use and effectiveness and dealing with any queries on its interpretation.

5.2 All Personnel

This Policy applies to all individuals who are employed by, or carry out work on behalf of, any OEG Group company including contractors, temporary staff and agency workers.

6. POLICY OBJECTIVES

OEG is committed, together with all of its directors and employees of all levels, to complying with all applicable competition laws in the countries in which we operate.

The fundamental objective of competition law is to regulate anti-competitive behaviour by businesses and individuals which may be to the detriment of customers and competitors.

Breach of competition legislation can expose OEG to the risk of substantial fines, civil claims, reputational damage, imprisonment of employees and directors' disqualification.

Given the variety of jurisdictions within which OEG operates, it is impossible in this policy to provide specific advice relevant to all markets and jurisdictions and individual businesses should, in conjunction and consultation with the OEG Senior Management, seek local expert legal advice as appropriate.

However, the most prevalent forms of anti-competitive behaviour typically derive from:

- Agreements, arrangements or other practices; or
- Abuse of a dominant position

Should it be established that the Company has been involved in the infringement of competition laws, adverse consequences for the Company and individuals could include:

- a. Significant fines on the Group or subsidiaries;
- b. Criminal prosecution of individuals, which may result in fines and/or imprisonment;
- c. Risk of legal actions for compensation;
- d. Contracts being declared unenforceable;
- e. The Company being prohibited from participation in tenders;
- f. Expensive and lengthy investigations;
- g. Director disqualification/dismissal of employees; and
- h. PR impact/reputational damage.



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7. DELIVERING OUR OBJECTIVES

OEG will make arrangements to promote this Policy and make available adequate learning opportunities for employees to understand and therefore comply with any competition law obligations. Employees, who are directly involved in the following activities will be specifically trained on competition law compliance, as these staff members are potentially more at risk of breaching competition law by the nature of their role:

- a. Procurement / price setting / price setting policy / transfer pricing;
- b. Communication with customers and suppliers (verbal or written with respect to prices and services of any OEG Group company);
- c. Direct or indirect influence or input into customer and supplier agreements;
- d. Business sales;
- e. Trade association members;
- f. Public procurement law; and
- g. Exclusivity agreements.

8. GOVERNANCE

The OEG Group Board provides oversight of this policy.