

COMPETITION LAW/ANTITRUST POLICY OF LAGUNA TECHNOLOGY



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1. Introduction

At Laguna Technology, we are committed to conducting our business in compliance with all applicable competition laws and regulations globally. Our Competition Law/Antitrust Policy outlines our commitment to fair competition and prohibits anti-competitive behavior in all aspects of our operations.

2. Compliance with Laws and Regulations

a. We adhere to all relevant competition laws and regulations in every jurisdiction where we operate, including but not limited to:

The European Union's Competition Law

Antitrust laws in other countries where we conduct business

b. Our employees, officers, directors, and representatives are expected to familiarize themselves with the competition laws applicable to their roles and responsibilities and to comply with them at all times.

3. Prohibited Conduct

- a. Cartel Activities: We strictly prohibit agreements or arrangements with competitors that may restrict competition, including price-fixing, bid-rigging, market allocation, and customer allocation.
- b. Abuse of Dominance: We prohibit the abuse of our dominant market position to unfairly exclude competitors, control prices, or restrict consumer choice.
- c. Anti-competitive Agreements: We do not engage in agreements or practices that unlawfully limit competition, such as tying arrangements or exclusive dealing agreements that harm competition.

4. Fair and Transparent Business Practices

- a. Pricing: We compete fairly in the marketplace and do not engage in predatory pricing or price discrimination that harms competition or consumers.
- b. Marketing and Advertising: Our marketing and advertising practices are truthful, transparent, and comply with all relevant laws and regulations.
- c. Intellectual Property: We respect the intellectual property rights of others and do not misuse intellectual property to stifle competition.

5. Training and Education

a. We provide regular training and education to our employees on competition law compliance to ensure awareness and understanding of their obligations under the policy.

6. Reporting and Compliance Monitoring

- a. Employees are encouraged to report any potential violations or concerns regarding competition law compliance through established reporting channels without fear of retaliation.
- b. We conduct regular compliance audits and assessments to monitor adherence to the Competition Law/Antitrust Policy and identify areas for improvement.



7. Consequences of Non-Compliance

a. Violations of this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, as well as legal consequences for both individuals and the company.

8. External Communication

a. All external communications, including public statements, press releases, and customer interactions, must adhere to the principles of fair competition and comply with relevant competition laws.

9. Review and Updates

a. This policy will be periodically reviewed and updated as necessary to reflect changes in laws, regulations, or business practices.

This Competition Law/Antitrust Policy is designed to ensure that **Laguna Technology** conducts its business ethically, transparently, and in compliance with all applicable competition laws and regulations. All employees and representatives are expected to familiarize themselves with this policy and uphold its principles in all business activities.