

# **Anti-Trust and Fair Competition Policy**

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1.0	ERM Head	17 <sup>th</sup> May 2025	Board of Directors

## 1. Purpose

UFlex Limited demonstrates zero tolerance towards any kind of anti-competitive conduct in our global operations. The Company follows the highest standards of corporate governance and adheres to doing fair and open business. The purpose of the Policy is to guide employees and other stakeholders (as mentioned in the Scope) on engaging in fair competition in all business dealings and relationships and define the Company's commitment to promoting market conditions determined by competitive market forces.

## 2. Scope

The Policy applies to UFlex Limited and its 100% subsidiaries. The scope of the policy applies to all employees of UFlex at all levels and grades, including directors, senior managers, officers, other employees (*permanent, fixed-term or temporary*), consultants, contractors, trainees, volunteers, interns, sponsors, seconded-staff, casual workers and agency staff, agents, or any other person/entity acting for and on behalf of the Company.

## 3. Definitions

- **"Anti-competitive Conduct"** refers to behaviour characterised by practices such as price fixing, rigged bidding, abuse of market power or dominance, formation of cartels, or other practices that lead to a manipulation of market forces and gain of undue market advantage.
- **"Company", "UFlex", or "we" or "our"** refers to UFlex Ltd.
- **"Competition"** refers to rivalry between economic entities during which the independent actions of each of them exclude or restrict the possibility for each of them to influence unilaterally on the general conditions of circulation of commodities in the relevant goods market.
- **"Policy"** refers to the Anti-Trust & Fair Competition Policy.

## 4. Policy Commitments

UFlex has laid out some commitments to address these areas as described below:

- UFlex is committed to carrying out business activities in a manner that is consistent with all applicable competition laws and regulations in the areas in which we operate. The Company acknowledges the responsibility to stay up to date with any changes and updates to these laws and regulations.
- UFlex strictly refrains from entering into anti-competitive agreements, and creation of market monopolies, which could include but are not limited to the following aspects:
  - Price fixing (present and future prices) of products and services.
  - Rigged bidding and collusive tenders.
  - Output restrictions or quotas, including the volume of sales or range of sold products.
  - Allocation of customers, suppliers, or market territories.
  - Prohibited agreements (e.g. cartels and vertical agreements).
  - Force of certain trading conditions on business partners.
- UFlex strongly prohibits the receipt, use and disclosure of any information on commercial or official information protected by law, having an adverse impact on fair competition principles.

- In case of any investigation by competition authorities, UFlex is committed to fully cooperating in compliance with applicable regulations and responding to communications in a prompt manner.
- UFlex strictly does not enter into any agreements with business partners if the agreement prohibit the sale of UFlex's products to a certain customer base.
- While entering any mergers, UFlex will ensure that all requirements of anti-trust and competition laws applicable to the Company are fully complied to, in every jurisdiction of operation.
- UFlex is fully committed to transparent and fair practices in all our dealings with customers, suppliers, and competitors.

## 5. Roles & Responsibilities for Implementation

- The **HR Head** is responsible for ensuring the Policy is communicated effectively and adhered to across all departments. The HR Head also oversees training programs to educate employees on fostering fair competition, fostering a culture of integrity.
- The **Compliance Officer** ensures that the Policy aligns with legal requirements, conducts regular audits, and investigates any potential breaches.
- The **Internal Audit team** reviews financial and operational activities to detect any suspicious conduct or irregularities. The Policy is updated according to the corrective actions identified.

## 6. Communication & Training

This Policy is made available to all our stakeholders on our corporate website. The Company provides training to all employees, particularly senior management, on the importance of fair competition and identification of anti-competitive conduct. In addition, refresher training is provided to all employees on an annual basis.

## 7. Monitoring & Review

The Company reserves the right to regularly review and make any necessary modifications to this Policy. Our internal stakeholders shall review the policy as per requisite and any amendments to the same shall be approved by the Board of Directors. Instances of anti-competitive behavior by the Company or senior management are monitored and recorded by the Compliance team and communicated to the respective stakeholders/regulatory authorities.

## 8. Grievance Redressal

The Company provides clear and accessible procedures for employees to report incidents of anti-competitive conduct. Incidents can be reported through the procedure outlined in our Whistleblower Policy to the HR Head or the Chairperson of the Audit Committee.

All reports will be verified for authenticity, handled with confidentiality, and investigated promptly. The company is dedicated to taking appropriate corrective actions, including disciplinary measures up to dismissal of the employee, in compliance with applicable regulations.

## 9. Non-Retaliation

Retaliation means to hurt someone or do something harmful to someone because they have done or said something harmful to you. The Company ensures that no individual shall suffer any detrimental effect because of their refusal of participation in any anti-competitive activity, even if it results in loss of business for the Company. The Company has zero tolerance towards any kind of retaliation. Any kind of retaliation will be considered as gross misconduct.

### Related Policies

This policy should be read alongside the following policies of UFlex:

S. No.	Policy
1	Code of Conduct
2	Supplier Code of Conduct
3	Whistleblower Policy
4	Anti-Bribery & Anti-Corruption Policy