

Fair trade and competition

Purpose

This Policy provides guidelines for compliance with all applicable antitrust and competition Laws and Fair trade .

Policy

The Company will comply in all respects with applicable antitrust and competition Laws.

No Director, Employee or agent of the Company shall enter into any understanding, agreement, plan or scheme, express or implied, formal or informal, with any competitor in regard to prices, terms or conditions of sale or service, production, distribution, territories or customers; nor exchange or discuss with a competitor prices, terms or conditions of sale or service, or any other competitive information; nor engage in any other conduct which violates any applicable antitrust or competition Laws. Normal subcontracting arrangements or joint proposals with competitors which are not in violation of applicable antitrust or competition Laws and which have been approved by the Law Department are not prohibited by this Policy. Any discussion with competitors in connection with a project in which the competitor is an alliance partner, joint venture or subcontractor must be cleared and coordinated with the Law Department.

All dealings of the Company will be conducted in a fair manner with honesty and integrity, observing high standards of personal and business ethics.

All works of the company shall be carried out in a professional, independent and impartial manner.

It shall be carried out honestly, with no influence tolerated in respect of any deviation from either Companies approved methods and procedures or the reporting of accurate results.

Data, test results and other material facts shall be reported by Sinntec in good faith and shall not be improperly changed.

All reports and certificates issued by Sinntec shall correctly present the actual findings, professional opinions or results obtained. Sinntec shall treat all information received in the course of the provision of its services as business confidential to the extent that such information is not:

- (a) already published,
- (b) generally available to third parties,
- (c) required to be released by law, or
- (d) otherwise in the public domain.

The company shall conduct marketing (including comparisons with, or references to, competitors, competitors' services or third parties) in a manner that is truthful, not deceptive or misleading or likely to deceive or mislead, and which is consistent with applicable laws, present itself in a fair manner and ensure presentational information,

including descriptions of the company, its affiliations, resources employed and the services provided, is as accurate and unambiguous as possible.

Procedure

The Company shall establish internal procedures and controls as appropriate to implement the provisions of this Policy, including without limitation the preparation and appropriate distribution of antitrust and competition compliance training materials designed to aid the Company's Employees and agents in fulfilling their responsibilities in antitrust and competition matters.

A copy of Policy shall be made available to all employees and each is provided with a summary outlining the requirements of the Policy and requested to confirm it has been received, read and understood.

A completed statement of compliance will be obtained annually from Each Senior Manager.

No Employee shall suffer demotion, penalty or any other adverse consequences arising from implementation of the Policy even if it may result in a loss of business.