



SEA BIRD SERVICES INC.
Anti-trust and Anti-competition
Policy

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Page 01 of 02

- Purpose:** Sea Bird Services firmly upholds its commitment to combatting "unfair methods of competition" and "unfair or deceptive acts or practices". This policy serves as a comprehensive guide for all employees at Sea Bird Services, ensuring compliance with antitrust and competition laws while conducting business in a just, ethical, and transparent manner.
It is of utmost importance that we consistently demonstrate professionalism, fairness, and unwavering integrity in all our business transactions and relationships, regardless of the location or the parties involved, be it competitors, suppliers, distributors, or any other stakeholders within our supply chain.
- Cartel:** A cartel is a formal agreement between a group of producers of a good or service to control supply or to regulate or manipulate prices. Cartels often fix prices, define trading terms, and allocate trade or market share rules to achieve economies of scale. Cartels are illegal in the in Egypt and all over the world they are regulated by anti-trust laws.
- Policy Framework:** In the current marketplace, competitors engage in various forms of interaction, including trade associations, professional groups, joint ventures, standard setting organizations, and other industry groups. Sea Bird Services supports and encourages such interactions, as long as they are conducted in a fair, ethical, and transparent manner.
It is important for associates to be aware of the potential antitrust risks when dealing with competitors and to exercise caution during all interactions with them.
Our priority is to ensure that any collaboration with competitors complies with Competition Laws and regulations.
Sea Bird Services strictly prohibits engaging in Price Fixing with any competitor(s) or supplier(s) under any circumstances. Sea Bird Services determines its own prices and other terms independently, without entering into agreements with competitors.
Price Fixing not only pertains to prices, but also includes other terms that impact consumer prices. Therefore, we are committed to not disclosing any such information to our competitors. This includes, but is not limited to: - Present or future prices - Shipping fees - Warranties - Financing rates - Pricing policies - Promotions - Bids - Costs - Capacity - Terms and conditions of sales, including credit terms - Discounts - Identity of customers.
Competitive information should only be obtained through legal and ethical means, such as published news, press releases, and publicly available information.
If any unauthorized or confidential information about a competitor is received, it must not be used, and the Chief Compliance Officer should be notified immediately.
Sea Bird Services, associates are prohibited from engaging with individuals in other entities with the intention of controlling or restricting the services of Sea Bird.
- Ethical Behaviour:** Sea Bird Services is dedicated to demonstrate its unwavering commitment by adopting a strict zero-tolerance policy towards any form of cartel behavior. In every instance, Sea Bird Services will steadily demonstrate professionalism, fairness, and the highest level of integrity in all our business transactions and partnerships. This commitment extends to all our operations, regardless of location.
- Legal Compliance:** At Sea Bird Services, adherence to antitrust laws is a top priority for all of our businesses and our reputation. We hold every employee accountable for complying with all relevant antitrust laws, and our managers are expected to take any necessary actions to ensure compliance and avoid any appearance of offensiveness. We recognize that any violation of antitrust laws could jeopardize the trust that our customers have placed in us, and we are committed to transparently reporting on any antitrust investigations that may affect our company. To maintain our high standards, it is essential that all Sea Bird Services managers remain vigilant in upholding our principles and commitments in all business dealings.



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Page 02 of 02

Communication: Sea Bird Services Antitrust guidelines are communicated to all employees, contractors and stakeholders besides made available electronically. The Antitrust Policy, procedures, and guidelines are routinely discussed with employees who attend antitrust training sessions. All employees are regularly trained. New employees receive training following their assignment. Compliance with policies, procedures, and guidelines is regularly evaluated in the course of internal and external audits, as well as periodic self-assessments.

Code of conduct: Sea Bird Services policy refrains from making any direct or indirect contact with actual or potential competitors or any other third party, through agents, suppliers, or customers, with the intention of engaging in cartel behavior.

Sea Bird Services refrains from proposing or entering into any agreement, either formally or informally, directly or indirectly, with actual or potential competitors, regarding sensitive competition-related issues such as fixing prices, dividing or sharing markets, customers or territories, or bid rigging process. Sea Bird Services is committed to report any indication or initiative of improper anticompetitive business conduct by an actual or potential competitor in accordance with the internal reporting procedure, including reporting to Anti-Trust authorities.

Sea Bird Services never participate in any trade association meeting where sensitive competition-related issues are discussed. In case such topics are raised during a meeting, Sea Bird Services employees leaves the meeting and request that it be noted in the minutes.

Clear communication amongst Sea Bird Services employees and/or and its agents/ is mandatory in all internal and external correspondence, including emails, texts, documents, discussions, and public statements, do not contain any statements that could be misunderstood by third parties or Anti-Trust authorities and courts in the context.

Ethical and Independent judgment is maintained throughout pricing and selling processes. Limit any information discussed during commercial negotiations, with or disclosed to competitors or other third parties, to only what is strictly necessary for completing or assessing the transaction.

Violation of Policy: The consequences of an antitrust violation are very serious, both for Sea Bird and for any employee whose conduct is the basis of the violation. Failure to comply with Sea Bird Antitrust Policy may result in disciplinary action, up to and including termination of employment. It will also result in substantial fines from and jail sentences for individuals. Fines can be as high as twice the gain from the violation or twice the loss imposed on its victims. Injunctions limiting a firm's future conduct may also be ordered by a court. In addition, prosecutors actively seek to enforce criminal penalties even against foreign nationals for activities outside their country if the activities impact that country's commerce. Additionally, injured parties may sue and obtain damages equal to three times ("treble damages") the amount of any financial loss resulting from a violation of the antitrust laws in some jurisdictions. A violation of this rule can result in fines of up to 10 percent of a company's worldwide turnover during the preceding business year.

In addition, such cases and investigations can result in tremendous disruption of Sea Bird business, as attention is diverted to investigation and defense preparation. Settlements can result in the entry of consent decrees or commitments that substantially limit a company's freedom of future business activity.

Approved and Revised By:
Mr. Ahmed M. Youssef

Vice President
Sea Bird Services