	Document Title: Antitrust and Competition Laws	Document Number:	CCE_HR_003
		Process Owner:	Human Resources Manager
		Revision Number:	003
		Revision Date:	Sept 22, 2025

Antitrust and Competition Laws

Purpose - Markdom is committed to conducting business fairly, honestly, and in full compliance with all antitrust and competition laws.

Policy Statement - We comply with all applicable export, import, and trade compliance laws in all countries with which we do business, and we also commit to promoting free and fair competition. Markdom employees must not engage in practices that restrict competition or manipulate markets. This includes, but is not limited to:

- Fixing or coordinating prices, discounts, or terms of sale.
- Dividing customers, territories, or markets.
- Limiting production or output to control market prices.
- Coordinating bidding activities.
- Boycotting specific suppliers or customers.
- Conduct business in any jurisdiction that is subject to an embargo or comprehensive trade restriction.

Markdom will comply with all applicable trade compliance laws, export controls, anti-boycott regulations, and sanctions programs.

Training


All relevant employees are required to complete Business Ethics and Antitrust Training at the start of employment and annually thereafter. HR will manage and store training records for tracking and legal compliance.

Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Ensure compliance with all antitrust and competition regulations	0 confirmed violations of competition laws	Continuous	HR / Compliance
Increase employee awareness	100% of affected employees are trained annually on competition law	Annual	HR / Training
Promote ethical supplier engagement	100% of supplier contracts to include a fair competition clause	By 2026	Procurement & HR
Continuous improvement	Conduct one risk assessment per year on compliance	Annual	HR / Compliance

Reporting Procedure

Reports may be submitted confidentially or anonymously using our Markdom Speak Up Reporting Form Online or directly to the HR Department

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Monitoring and Review

Regular reviews will be conducted to ensure compliance with laws and continuous improvement in fair competition practices. Violations will result in disciplinary action, including possible termination.

RECORD OF REVIEWS

Date	Revision Description	Approved By	Revision Level
June 03, 2022	Initial Release	President – Joerg D.	001
April 29, 2024	Added Training requirements & document # allocated	HR Manager – Johanna A.	002
Sept 22, 2025	Added Purpose, policy statements, objectives and targets table and reporting procedures	HR Manager – Johanna A. VP Global Operations – Billy Z.	003