

DISTRUPOL ANTITRUST AND COMPETITION LAWS POLICY AND PROCEDURES

I. PURPOSE

Distrupol BV, Distrupol Ltd., Distrupol Nordic AB, Distrupol Ireland Ltd., and each entity's respective parent company and wholly-owned subsidiaries, as applicable, (collectively "Distrupol") are committed to high standards of ethical, honest and legal business conduct. Distrupol will operate in full compliance with the antitrust laws of the United States, competition laws of the European Union, United Kingdom, and other global competition laws where we do business.

II. POLICY STATEMENT

Distrupol employees must not engage in price-fixing, bid rigging, market allocation or any other activity that violates any antitrust of competition laws. Generally speaking, employees are restricted or prohibited by antitrust and competition laws from:

- Communicating with competitors about prices and conditions of sale, bids, levels of production;
- Allocations of products, services, sales, customers, suppliers, or territories; or
- Making decisions to price product below cost in order to drive out fair commercial competition.

Please contact the Distrupol Law Department for further guidance on restricted or prohibited commercial activities. Violating antitrust or competition laws could subject Distrupol and the individuals involved to severe monetary penalties or civil or criminal enforcement by one or more governments and/or lawsuits by competitors, customers, or other affected parties seeking damages.

III. PROCEDURES

Distrupol employees must avoid contact with competitors, excepting approved personal contacts or contacts for only the purpose of pursuing a legitimate business interest. Any such competitor contacts must be documented pursuant to guidelines established by the Distrupol Law Department via defined procedures.

The Law Department will maintain a log of competitor contacts, which will be reviewed and evaluated on an annual basis.

All contact with competitors, even casual, must be reported to the Legal Department, via:

email at distrupol.legal@gpdcompanies.com

The correspondence should include:

- Date of contact
- Name of competitor
- Competitor's company
- Competitor's title at the company
- What you talked about, even if no business was discussed

If you spoke with more than one person at a company, a separate contact form must be completed for each person at the company.

IV. RESPONSIBLE PARTY

The Legal Department is responsible for implementation of and amendments to this policy.

V. SCOPE

This policy applies to Distrupol.

VI. EFFECTIVE DATE

April 1, 2021

VII. REFERENCES

The following reference documents apply to this policy:

Document Title	Document Type
Global Standards of Business Conduct	Reference

VIII. REVISIONS

April 1, 2021