

## Policy

# COMPETITION LAW COMPLIANCE POLICY

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### Enreach Integrated Management Document

This document is a part of the Enreach Integrated Management System (IMS). It supports the alignment of organizational processes with internationally recognized standards, promoting consistency, efficiency, and compliance across all operational areas.

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### Changelog

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# INTRODUCTION

## Policy Statement

Enreach competes fairly and complies with EU, UK, US and Dutch competition laws. We prohibit cartels and anti-competitive practices (e.g., price fixing, bid rigging, market/customer allocation, output limitation, exchange of competitively sensitive information), abuse of dominance, and anti-competitive mergers. This policy sets simple rules for interactions with competitors, pricing, distribution, information exchange, trade associations, joint ventures, and merger notifications.

## Scope

Applies to all employees, directors, contractors and third parties acting for Enreach worldwide. Covers sales, procurement, product, marketing, pricing, distribution, trade associations, joint ventures, collaborations, and M&A.

## Objective

This policy aims to prevent anti-competitive conduct by setting clear rules for interactions with competitors and handling of sensitive information. It establishes approval flows for high-risk activities, mandates regular training, and requires prompt escalation to Legal or Group Compliance before entering into any collaboration or transaction that could pose competition risks.

# ROLES & RESPONSIBILITIES

## Roles

ROLE	RESPONSIBILITY
<b>Managing Board</b>	<ol style="list-style-type: none"><li>1. Set tone from the top;</li><li>2. Approve risk appetite;</li><li>3. Receive periodic compliance reporting;</li><li>4. Oversight.</li></ol>
<b>General Counsel/Legal</b>	<ol style="list-style-type: none"><li>1. Interpret competition rules (EU/UK/US/NL);</li><li>2. Review agreements (distribution, JV, collaboration);</li><li>3. Manage dawn raid response and merger/filing strategy.</li></ol>
<b>Group Compliance Officer</b>	<ol style="list-style-type: none"><li>1. Own policy;</li><li>2. Oversee trainings;</li><li>3. Coordinate investigations and remediation.</li></ol>
<b>Lead Quality &amp; Security Office</b>	<ol style="list-style-type: none"><li>1. Enable clean-team protocols and access controls for sensitive data;</li><li>2. Monitor unusual data access related to competitor information.</li></ol>

## ROLE

## RESPONSIBILITY

### Country Leads

1. Oversee local implementation;
2. Ensure compliance with local laws;
3. Act as first escalation point;
4. Promote integrity culture;
5. Confirm partner due diligence and no competition risks before engagement.

### Managers/Circle Leads

1. Oversee implementation in teams;
2. Approve low-risk collaborations;
3. Escalate high-risk matters (competitor meetings, trade associations, data sharing) to Legal/Group Compliance;
4. Ensure training completion;
5. Apply competition law compliance controls.

### Finance

1. Maintain accurate books and records;
2. Avoid pricing coordination;
3. Support audits and investigations..

### All Employees

1. Follow this policy;
2. Complete training;
3. Avoid competitor information exchange;
4. Report suspected violations via Whistleblower channel or to a manager.

## Policy Rules

### 1) No cartels or anti-competitive agreements

- Strictly prohibit price fixing, bid rigging, market/customer allocation, output limitation, and exchange of competitively sensitive information with competitors.
- Do not enter no-poach or wage-fixing agreements with competitors.

### 2) Competitor contacts and trade associations

- **\*\*Internal channel separation and access controls\*\***

Where Enreach operates both direct and indirect sales channels, or multiple teams that may compete for the same customers or tenders, these channels and teams must operate independently. The following principles apply:

- Direct and indirect channels are treated as independent commercial units for competition law purposes.
  - Competitively sensitive information (including pricing, margins, bid strategy, customer strategies, pipeline data, and negotiation positions) must not be exchanged between competing internal channels or teams.
  - Access to systems, bid tools, CRM data, and pricing information must be restricted on a need-to-know basis and aligned with role-based access controls.
  - Employees must not seek or use information obtained from another channel or team to influence pricing, bidding, or customer strategy.
  - Any exceptions (e.g. operational coordination, customer migration at customer request) must be pre-approved by Legal or Group Compliance and follow clean-team principles where applicable.
- Require agenda, Legal/Compliance pre-approval for industry meetings; avoid discussing current/future prices, discounts, margins, costs, capacity, strategy, customer lists, or bids.
  - Leave the meeting and report if improper topics arise; keep minutes and attendance records.

### 3) Information exchange and clean-team protocols

- Do not share or receive non-public competitively sensitive information (e.g. prices, future pricing plans, discounts, costs, capacity, customer-specific data). with:
  - Actual or potential competitors;

- Trade association participants;
  - Partners, resellers, distributors, or suppliers where the information could influence competitive behavior;
  - Other Enreach employees or teams (including direct or indirect channels) that compete for the same customers, bids, or market opportunities.
- Use clean teams and NDAs for legitimate due diligence; share only aggregated, anonymised, or historic data where appropriate.

#### **4) Distribution and resale practices**

- No resale price maintenance (fixed/minimum resale prices); recommended or maximum prices must remain non-binding.
- Territorial/customer restrictions must comply with applicable block exemption rules; seek Legal advice before exclusivities or selective distribution.

#### **5) Abuse of dominance**

- If Enreach holds market power, avoid exclusionary or exploitative conduct (e.g., unfair pricing, tying/bundling without justification; loyalty rebates that foreclose rivals, refusal to supply without objective justification).
- Escalate to Legal for assessments and objective justifications.

#### **6) Mergers, joint ventures and collaborations**

- Seek Legal guidance early to assess filing/notification obligations.
- Do not gun-jump; maintain independence until completion; follow clean-team and integration planning protocols.

#### **7) Dawn raids and investigations**

- Not to answer questions themselves, but direct authorities to Legal; preserve documents; do not obstruct; ensure privileged material is handled appropriately.

#### **8) Training and speak-up**

- Mandatory onboarding and periodic refreshers for sales teams and senior leadership.
- Use Whistleblower channel if you become aware about violation of this Policy or law.

#### **9) Records and retention**

- Keep agendas, minutes, approvals, clean-team rosters, and training records; apply litigation holds when instructed.

## Regulatory

### FRAMEWORK

#### Legislation

### RELATED SECTIONS

- EU Directives & Regulations.
  - UK: Competition Act 1998.
  - US: Sherman Act.
  - NL: Dutch Competition Act (Mededingingswet) and ACM guidance (apply EU rules alongside national enforcement).
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## Standards

### FRAMEWORK

#### Corporate Policies & Procedures

### RELATED SECTIONS

- Code of Conduct
  - Compliance policies
  - Information security policies
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