



POLÍTICA ANTI-MONOPOLIO	CÓDIGO: GG-PL-12
	VERSIÓN: 1
	FECHA: 20/01/2020
	PÁGINA: 1 de 4
	FECHA REVISIÓN: 03-02-2021

We lead the battle against monopoly:

FIDI supports the adoption of antitrust compliance programs by its affiliates. In this sense, FIDI is determined to support the fight against cartels, which restricts competition between suppliers to the detriment of customers.

Background:

Membership in FIDI is highly valued by its Affiliates, and to ensure that this value continues, all FIDI affiliates must adhere to the highest ethical standards and free and fair competition.

Antitrust policy is a statement of commitment. It will strengthen the FIDI organization, the FAIM program, and all Affiliates by making clear what distinguishes them from non-FIDI companies.

All FIDI Affiliates agree to sign and be guided by the provisions of the antitrust policy. The antitrust policy covers its employees (whether permanent, fixed term or temporary) and any associated third parties who provide services on behalf of the FIDI Affiliates.

Antitrust policy will be integrated into FAIM. The procedural and audit requirements will be part of the FAIM Implementation Manual and the pre-audit assessment.

What is a cartel?

A cartel is an agreement, concerted practice, or conspiracy between competitors to present collusive offers, divide or share markets, and generally restrict competition.

A cartel is considered the most egregious violation of antitrust laws in most jurisdictions, which can lead to significant fines as well as criminal penalties.



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ABC will not tolerate cartel conduct

ABC respects the antitrust laws and regulations in the countries in which it operates and requires its affiliates to do the same. Participation in a cartel is unacceptable. It is against ABC's core values of competing freely and fairly, based on the added value of its products and services.

Laws and regulations sanctioning cartel conduct are in effect in most jurisdictions. These laws and regulations are designed to promote free and fair competition and to protect consumers. Antitrust compliance programs are conducted to detect and prevent cartels.

POLICY STATEMENT

Commitment by FIDI affiliates with immediate effect:

All FIDI affiliates undertake to have legal and ethical behavior, refraining from participating in any business that harms the interests of FIDI, other affiliates, clients, or the industry. FIDI and its affiliates will take steps to ensure that they are fully informed of the applicable provisions in laws and regulations in relation to cartel conduct and other antitrust violations, they will monitor their employees and business partners to ensure full and ongoing compliance.

Compliance

FIDI affiliates must ensure that they are aware of all applicable laws and regulations covering anti-competitive practices. in all jurisdictions in which they operate, they will obey and abide by those laws and regulations.

Companies affiliated with FIDI will ensure that they are aware of and comply with applicable laws and regulations in relation to cartels.



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Ethical behavior

FIDI and its affiliates are committed to taking a zero-tolerance approach to cartel conduct. At all times, FIDI and its affiliates will act professionally, fairly and with the utmost integrity in all dealings and business relationships, this will apply wherever they operate.

Commitment to FIDI values.

This policy will be formally integrated into the FAIM quality standard.

CODE OF CONDUCT.

By accepting this FIDI policy, we commit to:

1. Never establish direct or indirect contact (through third parties, including agents, suppliers or customers) with an actual or potential competitor or other third party, whose objective is to participate in the cartel's behavior.
2. Never propose or enter into an agreement, either directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issue, including:
 - Fixing prices.
 - Divide or share markets, customers or territories.
 - Do a competitive bidding process.
3. Report any indication or initiative of improper anticompetitive business conduct by an actual or potential competitor in accordance with your internal reporting procedure, which includes, but is not limited to, reporting to your legal department and / or relevant antitrust authorities.
4. Failure to participate in a trade association meeting where sensitive competition-related issues are discussed. If such issues are raised during a meeting, employees of FIDI affiliates should



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immediately request that the discussion end. If not, they should leave the meeting and ask to be noted in the minutes of the meeting.

5. Make sure that all internal and external correspondence, including emails, texts, documents, discussions and public statements, do not contain statements that could be misinterpreted by third parties or antitrust authorities and courts.

6. Maintain an independent judgment on the price or sale of any product and / or service.

7. Limit any information discussed during business negotiations, disclosed to competitors or other third parties, to what is strictly necessary to complete or evaluate the transaction.