

COMPETITION CORPORATE POLICY

Corporate Policy

OBJECTIVE

Establish the principles, guidelines and responsibilities for Pantaleon Group operations in matters of competition applicable to all commercial transactions and business strategy.

PURPOSE

Promote mechanisms and controls to cultivate a culture of corporate compliance in competition matters based on principles of legality, industry freedom, good faith, and sustainability.

IMPLICATIONS

- Pantaleon Group business units are subject to compliance with local and international competition or antitrust laws and avoid anticompetitive practices in their respective markets.
- The senior management of Pantaleon Group business units shall train their personnel to prevent anticompetitive practices.
- Pantaleon Group business units must seek legal advice on competition matters before proceeding any sale, merger, or acquisition, or with strategic plans for local or international markets to assess their market position, transactions or finalizing such business ventures to prevent potential anticompetitive activities.
- Pantaleon Group business units should not exchange competitively sensitive information with a competitor.
- Pantaleon Group business units should not enter any arrangement with a competitor aimed at price fixing, reducing output or capacity, delaying expansions, collective boycott, customer allocation or market sharing.