

ANTI COMPETITION BEHAVIOUR AND CONFLICTS OF INTEREST POLICY





Policy Approval

This policy was approved by Board of Directors decision issued on 07/31/2023

Table of Contents

Purpose:	3
Scope:.....	3
Policy Introduction:	3
Conflicts of Interest:	4
Procedure:	4
Anti-Competition:	4
Conflicts of Interest:	4
Reporting and Monitoring:	4
Implementation and Review:	5

Purpose:

The purpose of this policy and procedure is to promote fair competition, prevent conflicts of interest, and ensure that the company's actions are aligned with its commitment to Environmental, Social, and Governance (ESG) principles. The policy covers all aspects of the company's operations and applies to all employees, contractors, and third-party vendors.

Scope:

This policy and procedure apply to all employees, contractors, and third-party vendors of the Al-Andalus Company property and to all activities and transactions conducted on behalf of the company.

Policy Introduction:

Anti-Competition: The company is committed to promoting fair competition and to complying with all applicable anti-competition laws and regulations. This includes avoiding practices that are anticompetitive or that restrict competition, such as price fixing, market allocation, and exclusionary conduct.

- Employees must not take or appear to take any action that could unfairly exclude or reduce competition in any market.
- We must not misrepresent, manipulate, conceal, or misuse confidential information, and must not engage in disparaging discourse against competitors, or unfair practices with shareholders, clients, business partners, competitors, and other Employees.
- Employees must only obtain information about competitors, their products, services, technologies, pricing, marketing campaigns, etc. only through legal and ethical means.

Employees must ensure that discussions or confidential information exchanged do not lead to unlawful agreements, including verbal agreements, particularly at trade events and informal and social gatherings. In any circumstances where discussion amongst competitors is prevalent, Employees must:

- Avoid exchanging information with a competitor about prices, costs, profits, rates, contractual or bid terms, charges, commissions or discounts applicable to current or future clients, contractors or suppliers, and allocation of work, markets, territories or clients.
- Avoid making any statement that creates, implies or suggests to others that there is an anti-competitive agreement with a competitor.

Conflicts of Interest:

The Al-Andalus Company property is committed to avoiding conflicts of interest and to ensuring that its actions and decisions are impartial and free from bias. This includes avoiding situations in which the interests of the company and the interests of an employee, contractor, or third-party vendor are in conflict or may appear to be in conflict.

Procedure:

Anti-Competition:

- Employees, contractors, and third-party vendors are prohibited from engaging in any practices that are anticompetitive or that restrict competition, such as price fixing, market allocation, and exclusionary conduct.
- Employees, contractors, and third-party vendors are encouraged to report any concerns or suspicions about anticompetitive practices to the company's legal department or to a designated ethics hotline.
- Prohibited from fixing prices of services among the competitors within the domestic or international market;
- Disclosure of Information: employees, contractors, and third-party vendors must report any suspected or actual anti-competitive practices. Provide a designated reporting mechanism, such as an ethics hotline or the legal department, where they can confidentially report any concerns
- Internal Investigation: Upon receipt of a report of suspected anticompetitive practices, the company should promptly initiate an internal investigation to determine the facts. The investigation should be conducted in accordance with applicable laws and regulations and should be documented appropriately.
- Continuous Monitoring: The company should regularly monitor its operations to detect and prevent anti competitive practices. This may include conducting audits, reviewing contracts and agreements, and monitoring industry developments and trends.

Conflicts of Interest:

- Employees, contractors, and third-party vendors must disclose any actual or potential conflicts of interest to the company in accordance with the company's conflict of interest policy.
- Employees, contractors, and third-party vendors must not participate in any transactions or activities that would create a conflict of interest or the appearance of a conflict of interest.
- Employees, contractors, and third-party vendors must not use their positions or influence within the company for personal gain or to benefit any third party.

Reporting and Monitoring:

The company will establish an internal reporting and monitoring system to detect and prevent anticompetitive practices and conflicts of interest. We will regularly review and update its anti-competition and conflicts of

interest policies and procedures to ensure that they are effective and in compliance with ESG principles and applicable laws and regulations.

Implementation and Review:

This policy and procedure will be communicated to all employees, contractors, and third-party vendors, and will be reviewed and updated annually or as needed. They must read and understand this policy and Alandalus code of conduct. Failure to comply with this policy and procedure may result in disciplinary action, up to and including termination of employment or termination of the contractual relationship.

cy and the Al-Andalus Real Estate Code of Conduct.

