

ANTI-TRUST CHARTER

GLS KOREA is fully committed to conduct all of our business in an honest and ethical manner. In compliance with FIDI FAIM requirements, we are committed to comply with the FIDI Anti-Trust Charter that fights against Cartels and unfair practices. We comply fully with The Indian Competition (Amendment) Act, 2007, and work closely with other Anti-Trust laws in the countries where we do business. GLS KOREA never seeks a competitive advantage through unethical, illegal or unfair practices. We are determined to support the fight against cartels, which restrict competition among suppliers to the detriment of customers. This policy applies to individual employees, agents, suppliers, consultants or any other people or bodies associated with GLS KOREA, or any of its subsidiaries and employees.

ANTI TRUST MANAGEMENT PROCESS

GLS KOREA believes there are four key elements affecting Anti-Trust Non Compliance in Supply Chain practice. They are:

- Price Fixing
- Bid Rigging
- Market Sharing
- Production Control

In order to comply with the Anti-Trust Regulations, at GLS KOREA, we

- 1) Identify the risks Identify the key antitrust law risks faced by the business. These may include direct exchanges of commercially sensitive information with competitors or indirect exchanges via a third party (such as a common customer, supplier or other intermediary). For other businesses, frequent collaboration with competitors may give rise to antitrust risk; for some, abuse of market power may be a principal concern.
- 2) Assess the Risks Rate the identified risks according to their seriousness (e.g. low, medium or high) and assess which employees are in high risk areas (e.g. those who are likely to have contact with competitors and those in sales and marketing roles).
- 3) Mitigate the Risks Set up appropriate policies, procedures and training to mitigate the risks identified and to detect any issues that do arise.
- 4) Review the procedure We frequent review steps 1 to 3, and consider the circumstances in which an additional review may be required.

At GLS KOREA to prevent the risk of Anti-Trust Non-Compliance In Supply Chain, employees

1. Should not discuss pricing with competitors. Never attend a meeting at which pricing will be discussed. If it comes up at a meeting, protest (and follow this up in writing) and leave immediately.

2. Should not discuss dividing or allocating customers, markets or territories with a competitor.
3. Should not restrict the resale activity of a customer or attempt to control the customer's resale price.
4. Should not talk to suppliers / vendors about the prices they must charge customers in case they are being introduced by GLS KOREA directly to customers.
5. Should not talk to your customers about other customers or about how you sell to other customers.
6. Should not require a customer to buy exclusively from your company.
7. Should not require a customer to buy one product to obtain another.
8. Should not make sales or purchases conditional on reciprocal sales or purchases.
9. Should not suggest that a purchaser should buy from your company because your firm buys from the purchaser's company.
10. Should not charge different prices for the same volume of product to customers who may compete with each other.
11. Should not disparage a competitor's product, verbally or in writing, unless you can prove your charges.

These are general guidelines and are not a complete statement of the antitrust laws. Staff should review these guidelines and specifics with GLS KOREA Directors and be certain the basics are conveyed to all employees, especially sales people.

Meetings of trade associations, which bring together many key competitors, potentially can be viewed as generating illegal activities. Employees working on association activities that include employees from competing companies should be certain that:

1. Minutes are kept of all meetings of any committees and the general group.
2. Competent counsel is present at each meeting and is available for advice.
3. No discussion of any type is held dealing with any subject matter that could be unlawful, especially pricing or customer dealings.
4. The trade association is formed and operates in good faith for the benefit of the industry and allows all participants to benefit by its activities.

This procedure is communicated to the staff at the time of induction through induction training / quality training and through emails when there is a change in the procedure.

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