

Putters International NV Anti trust policy:

What is a cartel:

A cartel is an agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition.

A cartel is regarded as the most egregious violation of Anti-Trust laws in most jurisdictions, which may lead to the imposition of significant fines as well as, in certain jurisdictions, criminal penalties.

Putters International NV will not tolerate Cartel conduct:

Putters respects the Anti-Trust laws and regulations in the countries in which it operates and requires that its subcontractors/local partners do the same. Involvement in a cartel is unacceptable. It is against Putters's core values of competing freely and fairly, based on the added values of its products and services.

The laws and regulations that sanction cartel conduct are in place in most jurisdictions. These laws and regulations are designed to promote free and fair competition and to protect consumers. Anti-Trust compliance programs are there to detect and prevent cartels.

Statement:

All Putters International NV's sub-contractors and partners commit to legal and ethical behaviour, and to refrain from engaging in any business that will harm the interests of Putters, clients or the industry. Putters will take steps to ensure they are fully informed of applicable Anti-Trust laws and regulations in connection with cartel conduct and other Anti-Trust violations, and will monitor their employees and business partners to ensure full and continual compliance.

Legal compliance:

Putters International NV's sub-contractors and partners will ensure that they are aware of all applicable laws and regulations covering anticompetitive practices in all the jurisdictions in which they operate and that they will obey and uphold those laws and regulations.

Putters International NV's sub-contractors and partners will ensure that they are aware of and are complying with applicable laws and regulations in connection with cartels.

Ethical behaviour:

As a demonstration of its commitment, Putters International NV's sub-contractors and partners pledge to take a zero tolerance approach to cartel conduct. At all times Putters International NV's sub-contractors and partners will act profesionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.