

ANTI-COMPETITIVE PRACTICES POLICY

22/12/2025 - Internal Audit



1. INTRODUCTION

SACMI Group is committed to complying with all applicable antitrust and anticompetitive laws and regulations. This policy has been developed to ensure that all business activities are conducted in compliance with such laws and to prevent any conduct that could be considered anticompetitive.

2. SCOPE

The purpose of this policy is to:

- Promote fair and open competition.
- Avoid practices that may be considered anti-competitive in violation of applicable regulations.
- Provide guidelines to employees to recognize and prevent anti-competitive behavior in violation of applicable laws.
- Ensure that SACMI Group always operates in compliance with antitrust and anticompetitive laws.

3. APPLICABILITY

This policy applies to all employees, officers, board members and contractors of SACMI Group, as well as any other person or entity acting on behalf of the company.

4. GENERAL PRINCIPLES

SACMI Group adopts the following principles to ensure compliance with antitrust laws:

- **Fair Competition:** promoting fair competition, avoiding practices that could restrict the market or unfairly harm competitors.
- **Prohibition of Cartels:** Participation in agreements or understandings with competitors aimed at fixing prices, dividing markets, limiting production or rigging tenders in violation of applicable regulations is not permitted.
- **Prevention of Abuse of Dominant Position:** Behaviours that could constitute an abuse of a dominant position on the market, such as exclusionary practices or the imposition of unfair prices, must be avoided.
- **Cooperation with Authorities:** Full cooperation with antitrust and anticompetitive authorities during investigations and inspections is required.

5. PROHIBITED BEHAVIORS

The following behaviors are prohibited, if they are classified as being in conflict with the laws in force on the subject:

- **Price Agreements:** No participation in agreements with competitors regarding prices or conditions of sale.
- **Division of Markets or Customers:** No agreements with competitors to divide markets or customers.
- **Production Limitation:** No limitations on production or production capacity are agreed with competitors.
- **Tender Manipulation:** No participation in agreements to manipulate the outcome of tenders.
- **Sensitive Information Exchanges:** No sharing of sensitive information about prices, costs, marketing plans, or other competitive information with competitors.

6. TRAINING AND COMMUNICATION

SACMI Group provides communication and training to its personnel on the principles of competition and applicable anti-competitive rules, as well as on the measures adopted by SACMI Group to prevent and avoid behavior that conflicts with these principles and rules.

7. REPORTING VIOLATIONS

Any employee who becomes aware of a potential violation of this policy is encouraged to immediately report the matter to their manager or through other designated reporting channels. Reports may be made anonymously and will be treated confidentially.

8. PUBLICATION, REVIEW AND UPDATE

This policy will be published on the corporate intranet (Digital Hub), periodically reviewed and updated to ensure that it remains compliant with applicable antitrust and anti-competition laws and that it meets the operational needs of SACMI Group.

9. CONTACTS

For any questions or clarifications regarding this policy, employees are invited to contact sostenibilita@sacmigroup.com .

