



CCL SECURE'S ANTITRUST POLICY STATEMENT

CCL Secure (or “the company”) is committed to the principles of free and fair competition. The company will comply with applicable competition and antitrust laws and regulations in all countries where the company does business.

CCL Secure strictly prohibits any personnel (director, employee, contractor, business partner and third party representative) engaging in any conduct or activity which breaches these laws. The company also expects its competitors, suppliers and business partners to exercise equal respect and care for CCL Secure’s best interests and reputation.

Given that international antitrust compliance is a highly complex area, laws and regulations differ from jurisdiction to jurisdiction and are constantly evolving. In many instances, measures that will ensure compliance in one country will not ensure compliance in another. Although the laws may differ from country to country, CCL Secure prohibits personnel from engaging in the following common illegal antitrust activities:

- Agreement between competitors not to compete for certain customers, accounts or territories;
- Agreement between competitors regarding bid pricing, bid rigging or not to compete for certain bids;
- Agreement between competitors about which suppliers or customers they will or will not deal with;
- Agreement between competitors about restricting or reducing output or production; or
- Any discussion with a competitor on any matter related to the four items above.

CCL Secure’s Antitrust Policy has been designed as a point of first reference on this topic and contains important guidance and requirements which apply to all CCL Secure’s personnel, whenever antitrust issues arise. In addition, all personnel who hold high exposure roles will receive online antitrust training within 60 days of joining the company or being promoted to a high exposure role. Refresher antitrust training is also provided every 18 months.

CCL Secure personnel who suspect or know of any potential or actual anticompetitive behaviour or illegal antitrust activities have a responsibility to report these suspicions or observations. They can report their concerns using CCL Secure’s external Whistleblower service provider, Expolink UK. This service can be accessed either via the Expolink website, or by calling one of the Hotline numbers:

- In Australia, the toll free Expolink hotline number is 1800 121 889; or
- In the United Kingdom, the toll free Expolink hotline number is 0800 374 199; or
- In Mexico, the toll free Expolink hotline number is 01800 123 0193.