

Competitive Compliance Guidelines

MLDK – THE BRANDED GOODS ASSOCIATION

The Competitive Compliance Guidelines for the Branded Goods Association is compiled and passed by the Board of the Branded Goods Association to prevent a breach of the Competition Act at meetings and activities within MLDK.

All members of the Association must agree to the guidelines and ensure that all employees that participate in activities associated with MLDK are familiar with the current guidelines at any point in time. This way, the members help to minimize the risk of a breach of the Competition Act.

All corporations remain independently responsible to obey the Competition Act. Complying with the Competitive Compliance Guidelines for the Branded Goods Association does not remove this responsibility.

When do the Guidelines Apply?

The Competitive Compliance Guidelines for the Branded Goods Association apply in all types of activities associated with MLDK. That is, all types of MLDK events, Networking Meetings, and other meeting with or without participation of non-members organized in association with MLDK.

Who do the Guidelines Apply to?

Anybody, who participates in the Branded Goods Association's activities, must know and respect the MLDK's applicable Competitive Compliance Guidelines at all times. This includes, among others, employees, members, non-members, and anybody who acts on behalf of these.

Where do the Guidelines Apply?

The Competitive Compliance Guidelines for the Branded Goods Association apply regardless of where or how events or meetings are held. Thus, the Guidelines apply to events and events in MLDK's locations, but also for activities conducted externally (e.g. at a member company) or conducted virtually (e.g. telephone meetings).

The Competitive Compliance Guidelines are:

1. At meetings or other activities associated with MLDK, the participants must under no circumstances enter into agreements, discuss, or otherwise exchange information about confidential business relations and other competitive parameters. The Competitive parameters are that, which companies can use to their advantage in the competition of customers. It is primarily information about prices, production, costs, and sale, but can also be information about other business circumstances or commercial strategies.

The following topics cannot be discussed in associations with MLDK

- a. **Purchase and Selling Prices.** This includes, e.g. companies' individual prices, price levels, price differences, price changes, profits, discounts, and bonuses.
 - b. **Individual inventory, capacity, inventory status, technical development or future investments.**
 - c. **Share of market, customers, or supply sources.** For instance, discussion of which goods or customers one focuses on in one's marketing.
 - d. **Making of Offers.** For instance, discussion of whether one will make a bid on a particular project or what one can offer the customer.
 - e. **Exchange of experiences about specific customers,** which may give an impression of or lead to a **mutual opinion** about these. For instance, a recommendation to transfer new costs to the customers.
 - f. **Other trading conditions and individual negotiations** of these. For instance, number of credit days, rates of interest, delivery time, default on defects and delays, and warranty periods.
 - g. **Costs and cost levels** including prices and terms of purchasing of services and goods from the members own suppliers.
 - h. Specific **business plans, marketing initiatives,** or other information about individual companies' future plans on product development, production, marketing, and sales.
 - i. **Other factors,** which can eliminate insecurity about how other participants specifically act in the market.
2. Prior to conduction of meeting and other types of activities associated with MLDK, a comprehensive and pre-approved by MLDK agenda for the concerning event shall always be issued and this must be followed.
 3. Prior to participations, participants in meetings and events must consider what they wish to discuss and whether the topic might be conflicting with the Competitive Compliance Guidelines for the Branded Goods Association.
 4. If a participant at a meeting or event associated with MLDK experiences that topics discussed are violating with paragraph 1 of the Competitive Compliance Guidelines, the participant must immediately protest and ensure that the discussion immediately is reported to the moderator, who must instantly interrupt the discussion, if the moderator finds that it is in violation with paragraph 1.
 5. The Branded Goods Association composes a record after conduction of meetings and events. If the record contains discussions of matters stated in paragraph 1 at MLDK's

meetings and events, the record does not have status of binding decisions. It is up to the individual participant/company to make their own decisions.

6. Regardless of MLDK's approval of the agenda and composition of the record, MLDK and employees of MLDK as well as members of the Board takes no responsibility to members or third parties for issues discussed at meetings or events held in association with the Branded Goods Association and the Competitive Compliance consequence thereof.
7. The Branded Goods Association cannot participate in exchange of confidential business relations between members nor in any way be a platform for an exchange of information as such, when this information may affect competition.

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