

Appendix E: Conflict of interest and fair competition

Conflict of interest

Employees and third parties must be free from conflicts of interest that could adversely influence their judgment, objectivity, or loyalty to the company in performing Neways business activities. Neways Employees and Stakeholders must avoid situations where their personal interests could inappropriately influence, or appear to influence, their business judgment. This is called “conflict of interest.” Also the implication that personal interests of Neways Employees or Stakeholders influence business judgment can hurt Neways its reputation and business which should be avoided at all times. Neways Employees and Stakeholders may take part in legitimate other activities outside their Neways activities, but any real, potential, or perceived conflict of interest caused by those activities must be without delay disclosed to your manager and updated on a periodic basis.

Conflict of interest Principles which apply to Neways Employees and Stakeholders:

- Be impartial and professional.
- When you come in a situation a conflict of interest can arise, you should report this to your manager.
- When a conflict of interest arises you should withdraw from the decision-making process which creates this conflict of interest.
- You will not use the knowledge gained by the use of corporate property, information or position within or related to Neways, for private companies or interests.
- You can perform other activities in your own time as long this will not create a potential conflict of interest.
- You will not use your Neways position for personal gain.

If you are in doubt if a certain situation can create a potential conflict of interest you should consult your direct manager for advice.

Fair competition

Competition laws – also referred to as antitrust laws – are designed to protect fair competition on a level playing field and with fair play. Such laws prohibit behavior which has the goal or the effect of preventing, restricting or distorting competition (e.g. price fixing and the allocation of markets or customers)

The potential consequences, including but not limited to penalties, for breaching competition laws are severe. In addition to Neways its liability as a company, Employees who engage in anticompetitive behavior can be subject to individual penalties and/or imprisonment. If you suspect that the competition rules are not being complied with, you are obliged to make your manager aware of this.

Neways always operates within the rules of competition law, and this means that you must follow the rules for fair competition. The basic principle for competition rules is simple: as a company you are not allowed to enter into any agreements whose aim is – or that could lead to – competition

being limited or distorted. Synchronization of market behavior between competitors, without this involving actual agreement, is also forbidden.

Despite Neways' commitment to comply with applicable competition laws, Neways may become the subject of an unannounced investigation by antitrust authorities. In the event of an investigation, Neways will fully cooperate with the investigators and will not destroy any documents, data or official seals.

Neways requires from itself and Stakeholders that they all comply with applicable laws, regulations and industry codes. Neways does not tolerate unfair competition.

Fair competition principles which apply to all Neways Employees and Stakeholders

- You will handle within applicable law and regulations regarding competition laws.
- Do not discuss with competitors the rates charged to clients, prospects, profit margins, price quotations or other confidential company information, either relating to Neways or to the competitor
- Do not make any agreements with competitors, suppliers or clients about market behavior
- Fully cooperate with the authorities in the event of an investigation
- When you have any concern or questions please consult your direct manager. If needed he or she can contact the legal department.

Violations of the law and Neways' Code of Conduct including this Appendix will result in discipline measures to be taken, up to and including termination of employment or the business relationship.