



DATUM
ADVANCED COMPOSITES

Datum

Antitrust & Competition Compliance Policy

VERSION 1.0

DATUM COMPANY POLICY

LEARN • INNOVATE • TOGETHER

**DELIVERING ADVANCED COMPOSITE SYSTEMS AND
SPECIALIST ENGINEERING SERVICES WITH PRIDE**



CONTENTS



01 Scope and Purpose of this Policy	... 03
02 Policy Overview	... 04
03 Prohibited Activities	... 05
04 Procedures	... 06
05 Frequently Asked Questions	... 07

01

SCOPE AND PURPOSE OF THIS POLICY

TO WHOM DOES THIS POLICY APPLY?

This Antitrust and Competition Compliance Policy applies to all employees, officers, directors, and agents of Datum Advanced Composites Private Limited (hereinafter referred to as "Datum" or "the Company"). It is mandatory for all individuals associated with Datum to adhere to the principles outlined in this policy.

PURPOSE OF THIS POLICY

The purpose of this Antitrust and Competition Compliance Policy is to ensure that Datum and its employees, officers, directors, and agents comply with all applicable antitrust and competition laws and regulations. This policy aims to prevent anti-competitive behaviour, collusion, and any other actions that may violate antitrust laws, thereby safeguarding Datum's reputation and legal standing.

02

POLICY OVERVIEW

Datum is committed to abiding by all applicable antitrust and competition laws, including but not limited to the Competition Act, 2002, of India. This includes refraining from engaging in any anti-competitive activities such as price-fixing, bid-rigging, market allocation, or other practices that may harm competition.

KEY PRINCIPALS

Datum is committed to fair and open competition, and we will conduct our business activities in compliance with all antitrust and competition laws.

All interactions with competitors, customers, suppliers, and other stakeholders must adhere to the highest ethical standards and be free from any anticompetitive practices.

Employees must not engage in price-fixing, bid rigging, market allocation, or any other activities that may limit competition or harm consumers.

Sharing competitively sensitive information with competitors is strictly prohibited.

DO

- △ Encourage open and honest communication within Datum.
- △ Seek legal advice or consult the Legal and Compliance Department if unsure about the legality of a business practice.
- △ Report any potential antitrust violations or concerns promptly to the Legal and Compliance Department or a designated compliance officer.

DON'T

- △ Engage in discussions or agreements with competitors regarding pricing, terms, or conditions of sales that may restrict competition.
- △ Share non-public, competitively sensitive information with competitors or other third parties.
- △ Attempt to monopolize markets or engage in predatory pricing practices.

03

PROHIBITED ACTIVITIES

Employees and representatives of Datum shall not engage in any of the following activities:

Price-fixing or collusion with competitors to set prices or terms of sale.

Market allocation or division, including agreements to refrain from competing in certain geographic areas or markets.

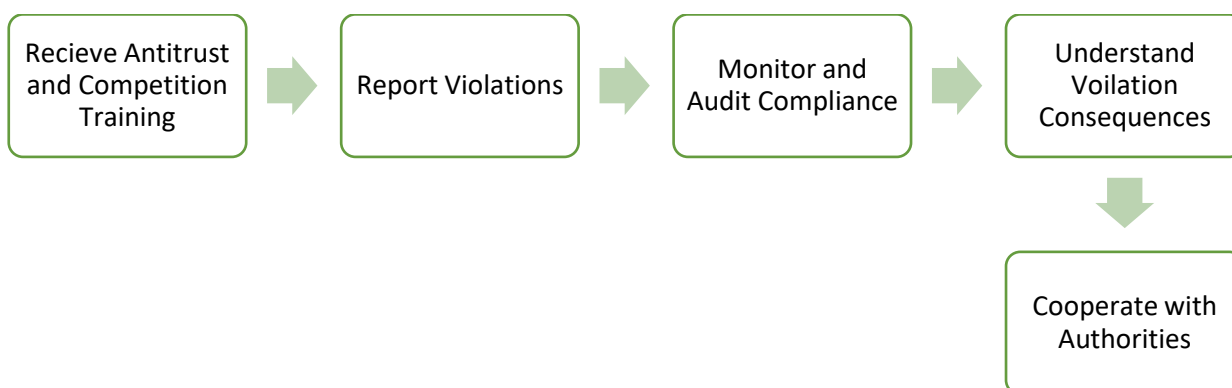
Bid-rigging or manipulation of competitive bidding processes.

Exchanging sensitive competitive information with competitors.

Predatory pricing, boycotts, or other anti-competitive practices.

04

PROCEDURES



Reporting Violations Procedure

Inform employees about the various reporting channels available, including supervisors, the Legal and Compliance Department, or anonymous reporting mechanisms.

Outline the steps for reporting potential violations, including the information to include and the procedure for submitting reports.

Emphasise the protection from retaliation for individuals who report violations in good faith.

Describe the process for investigating reported violations and the procedures for taking corrective actions as needed.

Compliance Monitoring and Auditing Procedure

Identify responsible personnel or teams for conducting compliance monitoring and audits.

Specify the frequency and scope of compliance audits, including both internal and external audits.

Define the criteria for evaluating compliance, such as documentation review, employee interviews, and third-party assessments.

Outline the procedures for reporting the results of compliance audits and the steps for addressing any identified issues.

05

FREQUENTLY ASKED QUESTIONS

Can employees discuss pricing strategies with competitors to align our pricing in the market?

No, employees must not discuss pricing strategies with competitors as it may violate antitrust laws.

What should I do if I suspect a potential antitrust violation within Datum?

If you suspect a potential antitrust violation, you should report it promptly to the Legal Department or a designated compliance officer. We encourage open communication to address and rectify any concerns.

Are there any exceptions to the prohibition on sharing competitively sensitive information with competitors?

There are very limited exceptions, such as when required by law or authorized by Datum's Legal and Compliance Department. However, employees should always exercise caution when sharing such information and seek legal advice if uncertain.

Can Datum engage in market research to gather competitive intelligence?

Yes, Datum can engage in market research, but it must be conducted in compliance with antitrust laws and avoid any practices that could harm competition. Always consult with the Legal and Compliance Department for guidance on gathering competitive intelligence.

Key Reference Documents

- ⚠ Antitrust Laws and Regulations
- ⚠ Legal Guidelines and Memos

Key Contacts

- ⚠ Human Resource Executive
- ⚠ Head of Legal and Compliance
- ⚠ Datum Senior Leadership
- ⚠ Speak Up Hotline
- ⚠ Legal Counsel

DATUM



ADVANCED COMPOSITES

DATUM ADVANCED COMPOSITES PRIVATE LIMITED
117 / H2 / 124, PANDU NAGAR, KANPUR – 208005, UTTAR PRADESH, INDIA

WWW.DATUMLIMITED.COM
CIN: U29308 UP2020 PTC128807 | GSTIN: 09 AAHCD 7509 H1ZG

Copyright © 2020 Datum Advanced Composites Private Limited – All Rights Reserved.
Its product and service designations are protected trademarks.

Proprietary document. This document and all rights, titles, interests in and to its content are the sole property of Datum Advanced Composites Private Limited. No intellectual property rights are granted by the delivery of this document or the disclosure of its content. This document shall not be reproduced or disclosed to a third party without the express written consent of Datum Advanced Composites Private Limited.

This document and its content shall not be used for any purpose other than that for which it is supplied. The statements made herein do not constitute an offer. They are based on the mentioned assumptions and are expressed in good faith. Where the supporting grounds for these statements are not shown, Datum Advanced Composites Private Limited will be pleased to explain the basis thereof.