

Antitrust & Competition Law

A.P. Gilfoyle Group is committed to conducting business ethically, honestly, and in full compliance with applicable U.S. and international antitrust and competition laws. These laws are designed to promote fair competition and protect consumers, and we expect all employees, officers, and directors to adhere strictly to them.

Prohibited Conduct

Employees must avoid activities that could violate competition laws, including but not limited to:

- **Price Fixing:** Agreeing with competitors to set prices or terms of sale.
- **Market Allocation:** Dividing markets, customers, or territories with competitors.
- **Bid Rigging:** Coordinating bids with competitors to influence the outcome of a bidding process.
- **Group Boycotts:** Agreeing with others to refuse to deal with a particular company or individual.
- **Tying and Bundling:** Requiring customers to buy unwanted products or services as a condition of obtaining desired ones.

Such conduct is strictly prohibited and can result in severe legal consequences for both the company and the individuals involved.

Seeking Guidance

Antitrust and competition law is complex, and the application of these laws can be nuanced. Employees should seek advice from the Legal & Compliance (L&C) department whenever there is uncertainty about the appropriateness of a particular business decision or course of action.

Reporting Violations

Employees who become aware of conduct that may violate competition laws or this policy must report it immediately to L&C or through the company's established reporting channels. Prompt reporting allows the company to address potential issues proactively and mitigate risks.

Non-Retaliation

A.P. Gilfoyle Group prohibits retaliation against any individual who, in good faith, reports a suspected violation or participates in an investigation. Retaliation is a serious offense and will be met with appropriate disciplinary action.