

Competition Law and Collusion Risk Policy

Company Name: Middle East for Publishing and Distribution

Effective Date: 4-9-2024

1. Purpose

The purpose of this policy is to ensure compliance with applicable competition laws and to mitigate the risk of anti-competitive behavior, such as collusion, within Middle East for Publishing and Distribution. The policy aims to protect the interests of the Company, its partners, customers, and the wider market by promoting fair competition.

2. Scope

This policy applies to all employees, sub-distributors, sales representatives, schools, and any third parties acting on behalf of Middle East for Publishing and Distribution. It covers all business operations, including sales, marketing, distribution, and partnerships, within Egypt. All parties covered under this policy must adhere to these guidelines to ensure compliance with competition laws.

3. Compliance with Competition Law

All employees, sales representatives, schools, and third-party partners must comply with the following principles:

- **No Collusion or Anti-Competitive Agreements:** The Company and its representatives must not engage in any form of agreement, whether formal or informal, with competitors, suppliers, or customers that may restrict competition. This includes, but is not limited to, price-fixing, bid-rigging, market-sharing, or output limitation.
- **Avoid Abuse of Dominant Position:** If the Company or any of its representatives holds a significant market share, they must not abuse their position by engaging in practices such as predatory pricing, exclusive dealings, or refusal to supply, which could harm competitors or the market.
- **No Sharing of Sensitive Information:** Sales representatives, and other stakeholders should not share sensitive commercial information (e.g., prices, discounts, customer lists) with competitors or any unauthorized third parties.
- **Compliance with Mergers and Acquisitions Regulations:** Any potential mergers, acquisitions, or joint ventures must be reviewed for compliance with competition laws to avoid creating a monopoly or reducing competition.

4. Prohibited Practices

The following practices are strictly prohibited under this policy:

- **Price-Fixing:** Any agreement with competitors to fix prices, discounts, or terms of sale.

- **Market Allocation:** Agreements to divide or allocate customers, suppliers, territories, or markets among competitors.
- **Bid-Rigging:** Manipulating or influencing the outcome of competitive bidding processes.
- **Cartel Formation:** Entering or being part of any cartel that restricts competition.
- **Boycotting:** Agreements to collectively refuse to deal with specific customers, suppliers, or competitors.

5. Training and Awareness

The Company will provide regular training sessions to all employees, sub-distributors, and sales representatives to ensure awareness and understanding of competition laws and this policy. Employees and representatives must complete mandatory training upon joining the Company and participate in annual refresher courses. Schools and other partners will be provided with guidance on compliance expectations.

6. Reporting and Whistleblowing

All covered parties are encouraged to report any suspected breaches of this policy or competition laws to their line manager or the Compliance Officer. Reports can be made anonymously, and the Company will protect whistleblowers from any form of retaliation.

7. Consequences of Non-Compliance

Any employee, sub-distributor, sales representative, school, or third party found to be in violation of this policy may face disciplinary action, up to and including termination of their contract or business relationship. The Company may also take legal action where appropriate.

8. Review and Updates

This policy will be reviewed annually and updated as necessary to ensure it remains in line with current competition laws and best practices.

9. Contact Information

For questions regarding this policy or to report a concern, please contact:
Compliance Officer, Middle East for Publishing and Distribution
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