

# Anti-Competitive Practice Prevention Corporate Policy

Mining Mineral Resources S.A.S

## Purpose

This policy ensures that all employees, directors, and representatives of MMR adhere to applicable antitrust and competition laws while maintaining ethical and fair business practices. It aims to foster an open, competitive marketplace, prevent anti-competitive behavior, and uphold MMR's reputation as a responsible corporate entity.

## Scope of Policy

This policy applies to all employees, officers, directors, contractors, and third parties acting on behalf of MMR, regardless of location. It covers interactions with competitors, suppliers, distributors, customers, and any entity influencing market competition.

## Policy Statement

MMR is committed to fair competition and does not engage in or tolerate anti-competitive practices, including but not limited to:

- **Price Fixing:** Any agreement with competitors to set or control prices.
- **Market Allocation:** Any practice of dividing markets, customers, or territories among competitors.
- **Bid Rigging:** Colluding with competitors to manipulate bidding processes.
- **Exclusive Dealing and Tying:** Enforcing agreements that unfairly restrict suppliers or customers from engaging with competitors.
- **Abuse of Market Power:** Engaging in predatory pricing, imposing unfair trading conditions, or limiting market access.
- **Collusive Behavior:** Any formal or informal agreements that reduce competition.

## Compliance Guidelines

- Employees must not discuss sensitive business information (e.g., pricing, strategy, market allocation) with competitors.
- All business decisions must be made independently and without informal agreements that influence competition.
- Any agreement with competitors, suppliers, or distributors must be reviewed by legal counsel to ensure compliance with competition laws.
- Employees are required to report any suspected anti-competitive behavior to the Compliance Officer or Legal Department immediately.

## Reporting Violations

Employees are encouraged to report any suspected violations confidentially without fear of retaliation. Concerns can be reported via:

- Compliance Officer
- HR Department
- Direct Management Contact (via secure company email channels)

MMR commits to investigating all reports and taking appropriate corrective action when necessary.

## Enforcement & Consequences

Violations of this policy may result in severe consequences, including but not limited to:

- Disciplinary action, up to termination of employment
- Legal penalties (civil and criminal)
- Repetitional damage to MMR

Management will take all necessary steps to investigate and address violations promptly.

## Training & Awareness

- All employees must undergo regular training on competition laws and this policy.
- Additional training will be provided for employees in high-risk roles (e.g., sales, procurement, strategic planning).
- Training records will be maintained for compliance auditing.

## Policy Review & Updates

This policy will be reviewed periodically to ensure alignment with evolving legal and business standards. Updates will be communicated to all relevant parties, and compliance will be continuously monitored.

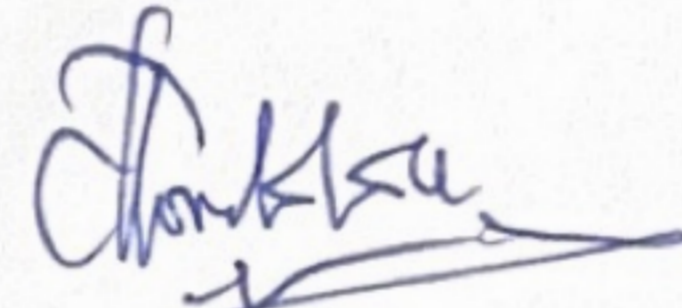
## Contact Information

For questions or concerns regarding this policy, employees should contact:

### Compliance Office

Mr. John Matt – Compliance Officer

Email: [john.Matt@mmrdrc.com](mailto:john.Matt@mmrdrc.com)



### HR Department

Mr. Ashok Kumar Tiwari – HR Manager

Email: [ashok.Tiwari@mmrdrc.com](mailto:ashok.Tiwari@mmrdrc.com)



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**Prepared by:** Corporate Compliance Team

**Approved by:** Senior Leadership

**Issued by:** MMR Management



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