I. *Competition/Anti-Trust Compliance Code*

Express International Group (EIG) believes in operating in a free open market. We are fully committed to complying with competition law applicable in those countries where we are present. By following this principle we will be more effectively driven by the need to be both efficient and innovative. To ensure compliance with the relevant legislation and effective application of this principle, EIG requires operating companies to adopt, as a minimum, the policy and guidelines set out in this document.

II. *Cartel Definitions*

A cartel is an agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition.
A cartel is regarded as the most egregious violation of Anti-Trust laws in most jurisdictions, which may lead to the imposition of significant fines as well as, in certain jurisdictions, criminal penalties.

III. *Statement of Policy*

No EIG Group company nor its employees shall engage in any activity which is prohibited by applicable local or international competition law. At a minimum, employees and companies are specifically prohibited from engaging in any form of communication, whether written, electronic or verbal, with a competitor which attempts to:

- Fix, stabilize or control prices, credit terms, discounts or rebates
- Allocate contracts, markets, customers or territories
- Boycott certain customers or suppliers, or
- Refrain from or limit the manufacture or sale of any product or service

Companies must ensure that they do not use commercial strategies which could violate competition law regarding dominant positions, or constitute attempts to monopolize or abuse a dominant position in any market. If there is any doubt regarding the appropriateness of any communication, contract or commercial strategy in the context of competition law then legal advice should be obtained.

All EIG stakeholders commit to legal and ethical behavior, and to refrain from engaging in any business that will harm the interests of EIG, other stakeholders, clients, or the industry. EIG will monitor their employees and business partners to ensure full and continual compliance.

IV. *Ethical Behavior*

As a demonstration of its commitment, FIDI and its Affiliates pledge to take a zero-tolerance approach to cartel conduct. At all times, FIDI and its Affiliates will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

V. *Legal Compliance*

Legal compliance
EIG stakeholders will ensure that they are aware of all applicable laws and regulations covering anticompetitive practices in all the jurisdictions in which they operate, and that they will obey and uphold those laws and regulations.
They will also ensure that they are aware of, and are complying with, applicable laws and regulations in connection with cartels.

VI. *Communication*

The Compliance & Human Resources teams will work closely to provide training program for newly hired employees as part of their induction program and those already working and in the appropriate local language as required, to ensure that relevant employees are sufficiently educated on the Policy.
“Relevant Employees” include officers authorized to act for the company; senior management; HR, removals, commercial, procurement executives; financial controllers or equivalent; anyone involved in a meaningful way in bidding, estimating, pricing, credit decisions, sales and marketing; those having commercial interaction with governments/regulatory agencies and those with any contact with competitors or trade associations.
The policy is communicated to all our stakeholders including but not limited to: employees, agents, clients and suppliers.

VII.	***Monitoring, and Assurance and Reporting***	EIG does not tolerate cartel conduct. The Compliance department must annually review the operational status of this Competition/Anti-Trust Policy and approved by the President. In addition, the HR department must ensure the awareness of each employee of EIG codes & policies.
VIII.	***Breaches of the Policy***	A risk of serious financial penalty being levied on the company. In addition the person(s) responsible for such action expose themselves to civil and, in some jurisdictions, criminal liability resulting in fines, imprisonment and/or disqualification from acting as an officer of a company. A breach therefore will be regarded as a grave offence and disciplinary procedures will be fully enforced up to and including termination of employment. EIG respects the Anti-Trust laws and regulations in the countries in which it operates and requires that other companies do the same. Involvement in a cartel is unacceptable. It is against EIG's values of competing freely and fairly, based on the added value of its products and services. The laws and regulations that sanction cartel conduct are in place in most jurisdictions. These laws and regulations are designed to promote free and fair competition and to protect consumers.
I.	***Monitoring & Enforcement***	If an individual believes that their personal information is not handled in accordance with our privacy policy or the applicable law, then a complaint should be submitted to senior management for their immediate investigation. EIG Management will monitor implementation every quarter annum. All staff is to be made aware that a breach of the rules or procedures identified in this policy may lead to disciplinary action that might lead to dismissal being taken against them in case of disclosure of Information.

This policy will be reviewed, and if necessary revised, annually to keep up to date and will be released on our company website.

Approved by:

Jerry Nazzal
Group President