

Ad Astra Group's Competition Policy

**RESPECT and APPRECIATION for all high values.
Preventing cases of bribery and corruption in our business.**

This policy, referred to as the Competition Policy, sets out the Ad Astra Group commitment in complying with the applicable legal framework (including the Treaty of the Functioning of the European Union) and in applying fair market competition practices.

In order to comply with the legal obligations and to ensure proper business undertakings and relationships with competitors, customers, vendors and business partners, it is required that this Competition Policy is read, understood and followed by all Ad Astra Group employees.

The Ad Astra Group also expects its vendors, when engaging with Ad Astra, to conduct business in accordance with the applicable laws and fair competition practices.

To ensure compliance with the above, the Ad Astra Group has developed and implemented following measures:

- Maintaining a Compliance Department that is independent, has and develops the necessary expertise, and is in close communication with all relevant departments, including the Ad Astra Group and its Board of Directors.
- Maintaining and updating a Risk Assessment to measure and manage anti-competitive risks in the Group.
- Maintaining and updating the Competition Policy that establishes what is and is not allowed under competitive conditions and the consequences of not complying with the Policy.
- Maintaining a Code of Conduct for Business Partners.
- Maintaining and updating appropriate procedures for reporting suspicious activity internally and externally to the relevant law enforcement authorities as appropriate.
- Investigating allegations relating to anti-competitive behaviors and taking appropriate action accordingly.
- The maintenance of appropriate records for a minimum of 5 years; and
- Conducting regular trainings to employees and keeping relevant training records.

This policy applies to the entire the Ad Astra Group and any of its subsidiaries.

As the Ad Astra employee, you should:

NEVER collude with competitors on prices, market or customer allocation, or other agreements that illegally limit competition, whether official or informal, written or verbal.

NEVER discuss or share commercially sensitive information with competitors.

SPEAK OPENLY and raise concerns about possible breaches of the Competition Policy with your Line Manager or via the Whistleblowing System.

Any violation of the principles set forth in this policy by any employee of the Ad Astra Group may have consequences for the employee which could vary depending on the level and type of misconduct