



Allcargo Terminals Limited
(Formerly known as Allcargo Terminals Private Limited)

CIN: U60300MH2019PLC320697

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Anti-Trust and Anti-Competitive Policy



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Purpose

Allcargo Terminals Limited (“ATL”) trusts in developing long-term relationships with all its stakeholders and endeavour to create value for them through its fair practices. ATL determines zero tolerance towards unfair methods of competition and unfair acts or practices. This policy provides guidance to all associates across ATL about antitrust and competition laws and conducts business in fair, ethical and transparent manner. It is important that we act professionally, fairly and with utmost honesty in all our business dealings and relationships; whenever and wherever we operate or engage with competitors, suppliers, contractors or any other members of our supply chain.

Scope and Applicability

This policy is applicable to all on-roll employees of ATL, Board Members, suppliers, contractors, consultants, trainees, service providers of our company and our subsidiaries, affiliates, group companies and persons or entities contractually obligated across all our operations.

Governance

Any changes to this policy shall be tracked and documented for future reference and all changes shall be performed only after prior approval of the Compliance Officer. Compliance Officer shall undertake periodic review and update this policy to reflect applicable law(s) and /or latest notifications released by the regulating authorities from time to time. Compliance Officer shall monitor the effectiveness and review the implementation of the compliance principles set forth in this policy, regularly considering its suitability, adequacy and effectiveness.

Policy Guidelines on Anti-trust/Anti-Competitive Practices

- In today’s marketplace, competitors interact in many ways, through trade associations, professional groups, joint ventures, standard setting organizations, and other industry groups. ATL encourages such dealings, provided they are fair, ethical and transparent in nature.
- Encourage the development and operation of competitive open markets and the liberalization of trade and investment in each country and market in which ATL operates.
- Refrain from exchanging information with competitors on individualized intentions concerning future conduct regarding prices, quantities or other elements of competitive behaviour.
- Avoid entering into any activity constituting anti-competitive behaviour such as abuse of market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors.



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- All employees must be aware of antitrust risks in their interactions with competitors and must maintain caution at all the times during their dealings with competitors.
- Competitive information and/or intelligence, must only be collected through legal and ethical means such as published news, press releases, information available in the public domain, etc.
- ATL shall not, under any circumstances, engage in Price Fixing¹ with any competitor(s) or supplier(s). ATL will establish prices and other terms on its own, without agreeing with a competitor(s). Price Fixing does not relate only to prices, but also to other terms that affect prices to consumers and therefore, employees should not disclose any such information to the competitors.
- While entering mergers, ATL shall ensure that all requirements of Anti-trust and Competition laws are fully complied. Also, ATL shall make necessary disclosures as mandated by applicable laws and regulatory authorities while entering mergers.
- While dealing with the competitors never agree to set prices or allocate regions or product markets or customers nor engage in bid rigging and refrain from exchanging any such confidential, price sensitive and commercially sensitive information.
- Not take up or involve in any activities competing with the business of the Company.
- If any unauthorized or confidential information is received about/from a competitor, we must not use this information and notify the Legal Department / Compliance Officer immediately.

Breach of Policy

Any violation of the policy guidelines set forth in this policy by any employee or any other persons / entity to whom this policy applies, may have significant consequences for the employee and ATL, including potential prosecution, fines and other penalties for inappropriate conduct, as well as imprisonment and/or disciplinary action up to and including termination.

| Version | Effective Date | Description of changes |
|-------------|---------------------------|---|
| Version 1.0 | 5 th July 2023 | Adoption of Policy at the Board Meeting held on 5 th July 2023 |

¹ Price fixing is an agreement (written, verbal, or inferred from conduct) among competitors that raises, lowers, or stabilizes prices or competitive terms.