
Grow Asia Partnership Ltd. Competition Law Guidelines

When undertaking Grow Asia-related activities, members, board of directors, consultants and staff (the “Representatives”) must lead by example making appropriate decisions to protect the reputation of Grow Asia, embracing its values and mission.

To preserve the informal nature of Grow Asia events/meetings while exchanging opinions and experiences and to ensure that deliberations do not interfere with the competitive relations of companies, the guidelines below on competition and antitrust laws have been developed. These guidelines apply to formal Grow Asia gatherings, and Representatives are obliged to ensure strict compliance.

DO

- Discuss macroeconomic issues and how they impact the global economy
- Discuss common problems and challenges of a general, administrative or logistical nature, as long as the purpose of the discussion is not to encourage uniform action or the elimination or restriction of competition, for example in relation to prices, capacity, inputs or outputs
- Share your opinion and experience, as long as this does not result in confidential or sensitive business information being shared
- Insist that any meeting has a list of topics known to you in advance; object if you see anything on the agenda that risks violating any of the prohibitions set out below
- Terminate a discussion or leave a meeting if you consider there is a risk of violating any of the prohibitions set out below
- Seek independent legal advice if you are at any time unsure of how to apply these rules

DO NOT

Discuss, recommend or agree on the following matters with members:

- Actual purchasing or selling prices, price trends, price changes and their implementation, methods of calculation, discounts, rebates or margins
- Costs, including input costs, staff costs or trend data
- Terms and conditions of purchase or sale or choice of suppliers and supplier categories
- Current or future levels of production and specific technological developments or changes that could have a competitive impact
- Division or allocation of geographies or customer groups, sales volumes or market shares
- Limitations on business methods or practices including those based on ethical or “fair” business practices
- Refusing to deal with customers or suppliers or agreeing to deal on specified terms or policies

Grow Asia Representatives, when the case, should also be circumspect in relation to any conversations with competitors outside the formal meetings.