



Fair Competition Policy

Revised as of February 22, 2023



Corporate
Citizenship



Our Commitment to Fair Competition

WHAT TO KNOW

We are committed to engaging in fair and vigorous competition, in compliance with all US federal and state antitrust laws, as well as competition laws and regulations globally.

These laws:

- Prohibit agreements that undermine competition;
- Prohibit or restrain certain actions by companies with large shares in an industry;
- Prohibit certain mergers, acquisitions, joint ventures or other combinations of competitors in order to prevent a substantial reduction in competition.

Certain business activities, such as agreements between competitors that fix prices, always violate these laws and our commitment to them. Certain other business activities, such as restrictive supply or distribution agreements, and some activities in product categories, may violate these laws and our commitment if our competitive position is strong enough relative to other competitors. Because antitrust and competition laws are complex and vary across states and countries, GEA employees are required to consult GEA legal counsel for guidance regarding application of these laws.

EMPLOYEE RESPONSIBILITIES

Nearly any activity involving interaction with competitors has the potential to run afoul of the antitrust and competition laws. The business activities to which these laws are most commonly applied, however, involve the selling, marketing and purchasing of good and services. Employees are responsible to observe the following guidelines:

- Review in advance with your assigned GEA legal counsel any proposed business discussions with competitors.
- Do not propose or reach an agreement or understanding with a competitor regarding any aspect of competition, including:
 - Prices
 - Terms or conditions of sale
 - Bids or bidding activities
 - Allocations of customers, channels, or product lines
 - Allocations of territories or geographies
 - Production, capacity, or volumes
 - Industry or market conditions
 - Costs, profits, or margins
 - Whether or not to do business with any customer, supplier, or other firm
 - Setting wages or not competing for employees
- Avoid discussions or interactions with competitors that may create the appearance of improper agreement or interaction.

- Think through any planned interaction with suppliers who also compete with GEA in the marketplace to avoid sharing of information that could be considered anti-competitive. In addition, careful consideration should be given to controlling the employees who interact with the competitor to avoid the appearance of improper agreement or interaction
- Gather competitive information from third-party or public sources; never exchange competitive information with a competitor. Consult with your assigned GEA legal counsel early, as you begin considering any of the following arrangements:
 - Participating in a trade association or standard- setting organization
 - Exclusive sale or purchase arrangements
 - Relations with or terminations of distributors
 - Selective price discounting
 - Bundling of goods or services
 - Restrictions on resale of GEA products or services
 - Technology licensing agreements that restrict the licensee or licensor

PENALTIES FOR VIOLATION

Employees who violate GEA policies are subject to disciplinary action, up to and including termination of their employment. Failure to comply with antitrust and/or other competition laws could lead to criminal and civil penalties for GEA and for you personally.