



# Policy on Trade Associations, Industry Groups and Conferences (TAIG)

F.I.S. operates in **markets and countries all around the world**. Their complexity, and business interactions with them, require F.I.S. employees to follow the **strict guidelines that have been implemented on how to behave correctly in different circumstances**.

The procedure **P.A. 1011 - Policy on Trade Associations, Industry Groups and Conferences (TAIG)** has the purpose to supply guidelines on **participation in trade associations and industry groups** to prevent activities and situations that could lead to violation of **antitrust laws**. These guidelines are purely indicative, therefore they do not give all the activities or situations that could violate the regulation. As examples, the following can be configured as TAIG: General Confederation of Italian Industry, APIC (Active Pharmaceutical Ingredients Committee), etc.

Participation in trade associations is not, in itself, behaviour that goes against the antitrust regulations. However, associations can be perfect for coordinating their member companies in order to **limit or misrepresent the competition, or for exchanging sensitive or confidential business information with competitors**

## What is the Employee required to do:

**Before an employee becomes a member of a trade association or industry group, Management\* approval is required.**

Each meeting should have a **written agenda**, which should be **examined with the Legal Office in advance**.

Should the agenda of a meeting include **improper topics**, employees should not attend.

**You are kindly requested to promptly report the need to join a Trade Associations or Industry Groups to your Manager, to the Internal Audit, the Legal and the HR Departments.**

**Suitable disciplinary mechanisms for employees will be applied whenever the company policies are violated, in accordance with applicable law.**



## HOW TO ACT - EXAMPLES

### What type of trade association or industry group activities should be examined with the Legal Office?

- Examine with the Legal Office any proposal made by a trade association or industry group that involves commitment to joint research, setting standards or collecting information from its members.
- Be sensitive to and careful of appearances created through contact with competitors at trade associations, industry groups, and conferences.
- Always find out which topics are to be discussed during a trade association and/or industry group meeting before attending.

### What should I do if an improper topic is brought up at a trade association and/or industry group meeting?

- If an improper discussion begins when you are present at a trade association or industry group meeting, you should insist on having the discussion closed.
- If the discussion does not close, leave the meeting as quickly as possible; announce your departure and make sure it is noted in the minutes.
- Contact the Legal Office immediately to determine if an additional follow-up action is required.

### Can I exchange information with competitors if the business purpose is lawful?

- The Legal Office can help determine if taking part in an information exchange is appropriate and, if yes, how to structure the exchange.
- Information should only be transferred to or from another company if there is a lawful company purpose and if the pro-competition advantages exceed the non-competition effects.
- Lawful company purposes can include safety improvements, the preparation of presentations to government entities, or respect of governmental regulations.

For more information refer to the complete PA Policy 1011 available in the "Policies and Procedures" section of the intranet.

\*The term "Management" means the Head of the organization in which the Employee works and the Departments that must issue authorization (HR, Legal Department, Internal Audit, etc.).

This is an English courtesy translation of the original documentation prepared in Italian language. Please consider that only the original version in Italian language has legal value.