



ISOSOLUTIONS ANTITRUST COMPLIANCE POLICY AND GUIDELINES

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Prepared by	Director Administration
Review and approved by	CEO
Issued by	Director Administration

1. Policy Statement & Purpose

isoSolutions is committed to competing fairly and independently. This policy aims to ensure all employees comply with the Competition Act (Canada) and similar laws and acts applicable in the countries where we conduct business. Violations can lead to multi-million-dollar fines, imprisonment for individuals, and severe reputational damage.

Key principles underlying Antitrust Laws globally: The key principles underlying Antitrust Laws globally include the promotion of competition, prevention of monopolistic practices, and protection of consumer welfare. These principles aim to ensure a fair marketplace by prohibiting anti-competitive agreements, abuse of dominant market positions, and mergers that significantly reduce competition. For instance, the United States' Sherman Act of 1890 established foundational antitrust principles by outlawing monopolies and conspiracies to restrain trade, while the European Union's competition law emphasizes maintaining market competition and consumer choice. These laws are enforced by regulatory bodies, such as the Federal Trade Commission in the U.S. and the European Commission in the EU, which investigate and penalize violations to uphold market integrity.

2. Prohibited "Hard Core" Conduct

The following "per se" violations are strictly prohibited and will result in immediate termination:

- **Price-Fixing:** Agreements with competitors to set, raise, or maintain prices, discounts, or credit terms.
- **Market Allocation:** Dividing territories, customers, or product lines with competitors.
- **Bid-Rigging:** Colluding on bids to ensure a specific company wins a contract.

- **Wage-Fixing & No-Poach:** Agreements with other companies regarding employee salaries or refraining from hiring each other's staff.

3. Interactions with Competitors

Whenever meeting with competitors (e.g., at trade associations or standards bodies), follow these "Dos and Don'ts":

- **DO** have a written agenda and keep accurate minutes for all meetings.
- **DO** leave any meeting immediately if competitively sensitive topics arise and ensure your departure is noted in the minutes.
- **DON'T** discuss "Competitively Sensitive Information" (CSI), including proprietary pricing, margins, costs, marketing plans, or R&D strategies.
- **DON'T** use industry standards as a pretext to exclude specific competitors or suppliers.

4. Technology, Digital Communications & Document Integrity (Canada)

- **Ephemeral Messaging & Obstruction:** Under Section 65 of the Competition Act, destroying or altering documents relevant to an inquiry is a criminal offence. Employees must not use "disappearing" or encrypted messaging apps (e.g., WhatsApp, Signal, etc.) to discuss business terms. All business-related communications must be conducted using company email and preserved as per the document retention policy of isoSolutions.
- **Algorithmic Pricing & AI:** The use of AI or third-party algorithms to monitor or match competitor pricing may be scrutinized under the **Civil Deceptive Marketing** or **Civil Agreement** provisions. isoSolutions shall not use any automated tools that facilitate unconscious parallelism or lead to "excessive pricing" in specific sectors as per the 2024 Bill C-59 amendments.
- **Deceptive Marketing Practices:** All digital representations of price (including "struck-through" pricing or automated discounts) must comply with Ordinary Selling Price (OSP) requirements to avoid "drip pricing" or misleading savings claims, which now carry significant Administrative Monetary Penalties (AMPs).

5. Reporting & Non-retaliation

- **Reporting:** Employees must report suspected violations immediately to the **Director of Administration**.
- **Protection:** Under the Criminal Antitrust Anti-Retaliation Act (CAARA), isoSolutions prohibits any form of retaliation against whistleblowers.



6. Training

- **Training:** High-risk personnel (Sales, Marketing, Senior Management) must complete interactive antitrust training annually.

Please sign and date below, to acknowledge that you have read and been trained on this policy.

Name: _____

Signature: _____

Date: _____