

## Competition Compliance Guidelines

for the Dublin facility opening reception

(29 November 2022)

These Competition Compliance Guidelines are to ensure that the *Dublin facility opening reception* is conducted in full compliance with all applicable competition laws.

The *Dublin facility opening reception* is an opportunity to share views and specific operational best practices within the aviation industry.

It shall be conducted in full compliance with German and EU competition laws, and the competition/ antitrust laws of all other relevant jurisdictions.

The *Dublin facility opening reception* shall be conducted pursuant to the following procedural guidelines:

1. All discussions or conversations among the *Dublin facility opening reception* participants, including during breaks and scheduled and non-scheduled social activities, connected with the event must follow these guidelines.
2. All discussion or conversation, shall be conducted strictly in **accordance with the written agenda**. Matters not on the agenda shall not be discussed without prior approval of Lufthansa Group Compliance Office.
3. Given that most *Dublin facility opening reception* participants are employed by (potentially) competing airlines, and recognizing that the existence of an unlawful agreement or concerted practice may be inferred from circumstances, including discussions among competitors, **exchanges** or disclosures of the following types **of information**, are strictly prohibited:
  - a) **Price-related information** (prices, rates, charges or surcharges, or any aspect that can impact the aforementioned);
  - b) **Costs-related information** which are not publicly available;
  - c) **Strategy-related information** with regards to routes, capacities, revenue management practices, or any other sensitive commercial or proprietary information dealing with aspects of competition or future business intentions.
4. It is strictly prohibited to enter into **agreements** – whether expressly or implied –
  - a) concerning prices and charges;
  - b) allocating markets, customers, suppliers, or agents;
  - c) intended to or likely to harm or exclude any third party from any market, or to induce participants or third parties to engage in collective anticompetitive behavior.

5. In the event that any participant introduces any matter that may **not** be **in conformity** with the forgoing, all other participants shall **object** to engaging in any discussion or exchange relating to it and bring the matter to the attention of the web conference hosts.

6. Prior to participation in the web conference, all participants will be required to have confirmed their understanding of these guidelines and their commitment to adhere to them.

**Acknowledgement:**

By participating in the *Dublin facility opening reception*, you acknowledge to have read the above Competition Compliance Guidelines and confirm your commitment to adhere to them at all times during your participation in the *Dublin facility opening reception*.