

Competition Compliance Guidelines

for the Lufthansa Technik Web Conference 2021

(6 October 2021)

These Competition Compliance Guidelines are to ensure that the Lufthansa Technik Web Conference is conducted in full compliance with all applicable competition laws.

The Lufthansa Technik Web Conference is an opportunity to share views and specific operational best practices with digitalization 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 web conference shall be conducted pursuant to the following procedural guidelines:

1. All discussions or conversations among web conference participants, including during breaks and scheduled and non-scheduled social activities, connected with the web conference 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 web conference 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.