



Competition Law Policy 2023

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Introduction

At System Bookings, we are dedicated to conducting our business with the highest standards of integrity, transparency, and compliance. This Competition Law Policy is a testament to our commitment to promoting fair competition, preventing anti-competitive practices, and adhering to all applicable competition laws and regulations. We firmly believe that compliance with competition laws not only fosters a level playing field but also contributes to a healthy and vibrant business environment that benefits our customers, competitors, and the overall economy.

Purpose and Scope

The purpose of this Competition Law Policy is to provide comprehensive guidance to all employees, representatives, and stakeholders of System Bookings on the principles and practices that govern competition law compliance. This policy applies to all aspects of our business operations, including interactions with competitors, customers, suppliers, and regulatory authorities. It serves as a roadmap to ensure that our employees and representatives understand the importance of fair competition and conduct themselves in full compliance with all relevant laws and regulations.



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Principles of Competition Law

System Bookings firmly adheres to the following key principles of competition law:

Prohibition of Anti-Competitive Agreements

We are committed to maintaining a competitive and open market environment. As such, we will not engage in any agreements, arrangements, or discussions with competitors that may lead to price-fixing, market-sharing, bid-rigging, or other anti-competitive practices. All interactions with competitors must be fair, transparent, and compliant with competition law guidelines.

Avoidance of Abuse of Dominant Market Position

System Bookings recognizes that competition is the lifeblood of a thriving marketplace. To uphold the principles of fair competition, we will compete honestly and ethically, avoiding any actions that may exploit our dominant market position to restrict competition, exclude competitors, or harm consumers. Our focus will always be on providing high-quality products and services to gain a competitive edge.

Compliance with Merger and Acquisition Regulations

As we pursue business growth and expansion, we will conduct any mergers, acquisitions, or business collaborations in strict compliance with all relevant competition laws and regulations. We will engage in proper due diligence and seek necessary approvals from regulatory authorities, where required, to ensure our actions do not hinder fair competition.

Transparent Pricing and Advertising

System Bookings recognizes that transparent pricing and advertising practices are vital to maintain consumer trust and promote fair competition. Our pricing will be accurate, upfront, and clearly communicated to our customers, without resorting to deceptive practices that could mislead consumers or unfairly influence market competition.

Respect for Intellectual Property Rights

We acknowledge the importance of respecting intellectual property rights, including patents, trademarks, and copyrights. System Bookings will not engage in any actions that could infringe upon the intellectual property rights of others, and we will protect our intellectual property in compliance with relevant laws.



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Training and Awareness

To ensure robust competition law compliance, System Bookings is committed to providing regular training and awareness programs to all employees and representatives. The training will cover the fundamentals of competition law, potential risks, and the consequences of non-compliance, as well as practical scenarios to help employees recognize and address potential issues.

Our training initiatives will not only focus on legal compliance but also emphasize the ethical implications of fair competition. We believe that a strong ethical foundation reinforces the importance of competition law and promotes a culture of integrity and responsibility within our organization.

Reporting and Compliance

System Bookings fosters a culture of openness and accountability. Any employee or representative who becomes aware of potential or actual violations of competition law is encouraged to report such concerns through our established reporting channels. Reports will be treated with confidentiality, and we will investigate and address all reported matters promptly and thoroughly.

Compliance with competition law is a fundamental expectation for all employees and representatives. We will take disciplinary action, up to and including termination of employment or contractual relationships, in the event of violations or breaches of this policy.

Cooperation with Regulatory Authorities

System Bookings is committed to cooperating fully with regulatory authorities in their investigations related to competition law matters. We recognize the significance of regulatory scrutiny in upholding fair competition, and we will respond to inquiries and requests for information in a timely and accurate manner. Our proactive cooperation demonstrates our commitment to compliance and accountability.

Continuous Review and Improvement

Competition law is a dynamic field, subject to changes in legal requirements and industry best practices. System Bookings is dedicated to continuously reviewing and updating this policy to align with evolving regulations. We will seek external legal counsel when necessary to maintain the highest level of compliance and ensure that our policies reflect the latest developments in competition law.



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Conclusion

At System Bookings, we take our commitment to competition law compliance seriously. This Competition Law Policy reflects our dedication to conducting business ethically, responsibly, and in full compliance with all relevant competition laws and regulations. By embracing these principles, we strive to build trust with our customers, competitors, and stakeholders while fostering a competitive and fair business environment. At System Bookings, we firmly believe that upholding competition law principles not only benefits our organization but also contributes to the overall well-being of the industry and the communities we serve. Through our adherence to this policy, we aim to continue growing as a responsible corporate entity and an ethical leader in our industry.