

Global Antitrust & Competition Policy

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I. Introduction

1. Purpose

Samsung Electronics conducts its business based on the principles of **fair competition** and **in compliance with antitrust and competition laws** worldwide.

The Global Antitrust and Competition Policy (“Policy”) provides the basic antitrust principles and standards for directors, officers and employees relating to all business activities of Samsung Electronics.

2. Application

This Policy applies to all directors, officers and employees at Samsung Electronics Co. Ltd., its subsidiaries and affiliated companies worldwide (collectively “Samsung Electronics”).

Antitrust and competition laws vary among countries; therefore, certain subsidiaries or affiliated companies may have their own antitrust policies. In such case, both this Policy and the local policy are applicable, and in case of any conflict in terms between the policies, the stricter standards will apply.

3. Definitions

‘Competitors’ are companies in the same or similar industry which offer similar products or services. The term “competitors” encompasses both actual and potential competitors.

‘Agreement’ is interpreted broadly to include explicit as well as implicit agreement and informal understanding. Agreement can be inferred from conduct and other circumstances.

‘Vertical Restraints’ refers to agreements or practices between companies acting on different levels of trade (e.g., relationship with distributors).

‘Dominant Market Position’ refers to the power to behave to an appreciable extent independently of its competitors and customers, or having the ability to control prices or outputs in a relevant market.

II. Principles

1. Compliance with Laws, Policies and Guidelines

Samsung employees are required to **comply with all applicable antitrust and competition laws worldwide**. In addition, all employees are obliged to adhere to internal policies and guidelines.

Noncompliance with antitrust laws poses grave risks to the company and its employees. In most countries, penalties for violation are severe, including imprisonment for individuals, fines and civil damages to the company, and irreparable harm to the company's reputation.



II. Principles

2. General Principles

2.1 Dealing with Competitors:

Agreements between competitors regarding prices, outputs, and sales territories are strictly prohibited.

➤ **Price Fixing, Output Restriction, and Market Allocation:**

It is prohibited to make agreements between competitors to fix prices (including price calculations, discounts, margins, etc.), to restrict production quantities, and to allocate markets by areas or customers.

➤ **Agreements on Tenders (Bid Rigging):**

It is prohibited to make arrangements between competitors regarding offer prices, winning prices, or other bidding terms.

➤ **Information Exchange between Competitors:**

Direct or Indirect exchange of competitively sensitive information between competitors is also prohibited. Competitively sensitive information includes, but not limited to, prices, quantities, costs, demand, customers, sales, turnover, profits, capacities, marketing plans, technologies as well as hiring and compensation terms.



II. Principles

2. General Principles

2.2 Dealing with Customers or Suppliers:

Anti-competitive agreements or practices with customers, distributors or suppliers are prohibited.

➤ **Resale Price Maintenance:**

Fixing or influencing the resale price of a customer or a distributor is prohibited.

Improper influence includes, but not limited to, threatening with supply suspension, penalties, sanctions or granting financial incentives.

➤ **Other Vertical Restraints:**

Certain vertical restraints, such as imposing resale territories or customer restrictions, could potentially violate antitrust and competition laws of many countries, and therefore employees must contact legal or compliance team prior to taking any action.



II. Principles

2. General Principles

2.3 Dominant Market Position:

Abusive or exclusionary practices by a company with a dominant market position can create serious antitrust risks and would therefore be prohibited.

Dominant market position is determined by comprehensively considering various factors including market share, entry barriers and relative scale of competitors in a relevant market.

Examples of abusive or exclusionary practices typically include exclusive arrangements, royalty rebates, tying and bundling, predatory pricing, price discrimination and refusal to deal.

None of these practices are illegal in all circumstances, but all of them carry risks under the antitrust and competition laws of many countries. And there is considerable divergence among countries about the definition of dominance and the range of practices that should be condemned as anti-competitive. For this reason, employees must contact legal or compliance team before undertaking any activity when employees consider the company may have a dominant market position for a particular product.



III. Inquiry, Reporting and Investigation

1. Inquiry

Any inquiry relating to this Policy or antitrust compliance can be submitted to the compliance team through the 'Ask Questions' function in the CPMS website or other available channels.

2. Reporting

Any employee, who becomes aware of or receive evidence about an antitrust law violation, must immediately report to the company.

You may use the '**Whistle-blow**' function in the CPMS website, send an e-mail to cp.wb.sec@samsung.com, or use the '**Reporting Violation of Law**' website (www.sec-compliance.net) for anonymous reporting. In this case, the whistleblower's personal information and the report will be kept confidential.

There will be no retaliation against a whistleblower who reports in good faith, and any retaliation will be subject to disciplinary action.

3. Investigation

Any action that interferes with government investigation or destroys relevant evidence has serious consequences and can adversely affect the company during the investigation and trial process.

You cannot delay or obstruct the inspection in any way.

You **cannot delete, destruct, or conceal any relevant information or document.**

