# STRAITS ORTHOPAEDICS

## FAIR COMPETITION POLICY

### 1. Preamble

At Straits, we believe that customers choose us based on the quality of our services and our competitive pricing. We respect fair and free competition between companies, which is protected by the prevailing competition and antitrust laws.

### 2. Definitions

"**Company**": Straits Orthopaedics (Mfg) Sdn. Bhd. ("Straits")

"**Conflict of interest**": A situation in which there is a risk of private interests putting the interests of Straits Orthopaedics at risk.

"**Employees**": All employees of Straits Orthopaedics.

### 3. Our positions

As a Company, we categorically refrain from engaging in any anti-competitive practices including but not limited to the following:

- we do not engage in cartel conduct in order to enhance our market position.
- we do not participate in agreements or arrangements that violate antitrust laws, nor do we engage in the improper exchange of information, including information related to pricing of merchandise.
- we comply with all applicable domestic and international laws and regulations to combat money laundering and terrorist financing.
- we ensure that we remain informed of current sanctions lists [1]and verify that our debtors and creditors are not listed on them

Approved by:

**Scott Gareiss**
**Chief Executive Officer**
**1 Sept 2025**

[1] Targeted Financial Sanctions - Anti Money Laundering / Countering Financing of Terrorism (AML/CFT) | Sanctions List Search | Sanctions List Search | Consolidated list of persons, groups and entities subject to EU financial sanctions | OFSI Consolidated List Search

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## POLISI PERSAINGAN SIHAT

### 1. Mukadimah

Di Straits, kami percaya bahawa pelanggan memilih kami berdasarkan kualiti perkhidmatan kami dan harga kami yang kompetitif. Kami menghormati persaingan yang adil dan bebas antara syarikat-syarikat, yang dilindungi oleh undang-undang persaingan dan antitrust yang berlaku.

### 2. Takrifan

**"Syarikat"**: Straits Orthopaedics (Mfg) Sdn. Bhd. ("Straits")

**"Konflik kepentingan"**: Situasi di mana terdapat risiko kepentingan peribadi yang meletakkan kepentingan Straits Orthopaedics dalam bahaya.

**"Pekerja"**: Semua pekerja Straits Orthopaedics.

### 3. Pendirian kami

Sebagai Syarikat, kami secara tegas mengelakkan diri daripada terlibat dalam sebarang amalan anti-persaingan termasuk tetapi tidak terhad kepada perkara berikut:

- kami tidak terlibat dalam tingkah laku kartel untuk meningkatkan kedudukan pasaran kami.
- kami tidak mengambil bahagian dalam perjanjian atau peraturan yang melanggar undang-undang antitrust, mahupun terlibat dalam pertukaran maklumat yang tidak wajar, termasuk maklumat berkaitan penetapan harga barangan.
- kami mematuhi semua undang-undang dan peraturan domestik dan antarabangsa yang terpakai untuk memerangi pengubahan wang haram dan pembiayaan keganasan.
- kami memastikan bahawa kami sentiasa dimaklumkan tentang senarai sekatan semasa[1] dan mengesahkan bahawa penghutang dan pemiutang kami tidak tersenarai di dalamnya.

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