



## **ANTITRUST POLICY**

SOUTH WESTERN TECHNOLOGIES & OILFIELD SERVICES LIMITED (SWTOSL), is a Well Production Solution Services Company. The organization shall not play any role in the competitive decisions of its members or their employees, nor in any way restrict competition among members or potential members. Rather it serves as a forum for a free and open discussion of diverse opinions without in any way attempting to encourage or sanction any business practice.

The organization provides a forum for exchange of ideas in a variety of settings including its management review, and Board meetings. This policy supports the policy of competition served by the antitrust laws and to communicate the Organization's uncompromising commitment to comply strictly in all respects with those laws.

To achieve this:

- The organization or her committee, section, or activity of the Organization shall not be used for the purpose of bringing about or attempting to bring about any understanding or agreement, written or oral, formal, or informal, expressed or implied, among two or more members or other competitors with regard to prices or terms and conditions of contracts for services or products. Therefore, discussions and exchanges of information about such topics will not be permitted at the organization meetings or other activities.
- There will be no discussions discouraging or withholding patronage or services from, or encouraging exclusive dealing with any supplier or customer, any actual or potential competitor, or any private or governmental entity.
- There will be no discussions about allocating or dividing geographic or service markets or customers.
- There will be no discussions about restricting, limiting, prohibiting, or sanctioning advertising or solicitation that is not false, misleading, deceptive, or directly competitive with organization products or services.
- There will be no discussions about whether the practices of any member, actual or potential competitor, or other person are unethical or anti-competitive, unless the

discussions or complaints follow the prescribed due process provisions of the Organization's code of conduct.

- Certain activities of the Organization and its members are deemed protected from antitrust laws under the First Amendment right to petition government. These includes ethical and proper actions or discussions by members designed to influence legislation at the national, state, or local level, regulatory or policy-making activities of a governmental body, decisions of judicial bodies. However, the exemption does not protect actions constituting a deception to cover anticompetitive conduct.
- Speakers at meetings of the Organization shall be informed that they must comply with the Organization's antitrust policy in the preparation and the presentation of their remarks.
- Meetings will follow a written agenda approved in advance by the Organization or its legal counsel.
- Minutes will be prepared after the meeting to provide a concise summary of important matters discussed and actions taken, or conclusions reached.
- During informal discussions at the site of any of the Organization meeting, all participants are expected to observe the same standards of personal conduct as are required of the Organization in its compliance.



Chris Idisi

Managing Director & CEO

1<sup>st</sup> March, 2021