

ETIS ANTITRUST POLICY

1. PURPOSE

In order to commit to upholding the principles of free and fair competition within the European telecommunications market, ETIS is strictly committed to conducting all activities in line with applicable antitrust and competition laws, particularly Article 101 and 102 [Treaty on the Functioning of the European Union \(TFEU\)](#). Furthermore, ETIS expects all participants to oblige by all antitrust and competition rules applicable to their respective organisations and countries.

This policy aims to ensure that all our physical meetings, webinars, and any other activities adhere to these rules.

2. SCOPE & GLOSSARY

In order to maintain a trusted and open environment, all participants of an ETIS activity are required to abide to applicable laws and to the guiding principles stated in number 3.

Participants include: (i) ETIS staff; (ii) all employees of organizations that have a formal relationship with ETIS; and (iii) any other individuals taking part in ETIS activities, including guests or individuals from organizations without a formal relationship with ETIS.

ETIS Management Board consists of main representatives of ETIS partners. ETIS Council is a subset of the ETIS Management Board members that meets periodically to oversee the operational aspects of ETIS. ETIS Staff are personnel of the ETIS Central Office. ETIS working group Core-Team is a subset of working group members assisting the ETIS Staff in working group planning and execution.

3. GUIDING PRINCIPLES

ETIS brings together telecom operators across Europe and telecom suppliers – some of whom may be actual or potential competitors - in order to exchange knowledge and discuss topics related to developments in the European telecom sector. ETIS is committed to uphold the principles of free and fair competition within the European telecommunications market.

All participants in ETIS activities must comply with the [Treaty on the Functioning of the European Union \(TFEU\)](#), specifically Articles 101 and 102.

All participants are therefore prohibited from sharing commercially sensitive information during ETIS activities, including, but not limited to following conduct:

Prohibited Conduct of Participants

- **Market sharing** e.g.,
 - discuss or agree to only working with certain third parties, competitors and suppliers
 - engage in or facilitate any concerted action of boycott against a customer, supplier or competitor
 - coordinate refusals to deal with, or sell to certain third parties,
- Discuss, exchange, or agree on any competitively sensitive information, whether directly or indirectly, in formal or informal settings (e.g., meetings, social events, or online forums)
- **Price Fixing** e.g., discuss pricing policies and purchase costs, not publicly available data including profit margins, or similar financial data (including production or sales volumes, capacity, or market shares)
- Discussion on limitation or control of production, markets, technical investment or investment
- Exchange of non-public information about planned mergers and acquisitions
- Exchange of non-public information about other current or future bids, or bid intentions, and terms & conditions of sale or purchase

If in doubt whether information to be shared is against relevant antitrust laws, participants should consult their own legal counsel before sharing.

4. MEETINGS

- ETIS activities shall include, whenever possible, ETIS staff and/or ETIS Working Group Core Team members
- An antitrust briefing is required at the first meeting of a working group or task force and before every activity a reference to this Anti-trust policy needs to be made
- All physical and online working group activity must always be based on an agenda that has been made accessible before the activity
- Participants need to seek advice from a competition expert prior to sharing if in doubt on the information they like to share. If information shared in a meeting is deemed to be against relevant antitrust rules, the ETIS staff and/or core-team members, as well as any other participant preserves its right to intervene and request the participant to refrain from discussing certain topics

5. LIMITATIONS OF ETIS LIABILITY

ETIS is a platform for information sharing in the telecom industry. ETIS does not filter, control or own shared information.

Therefore, ETIS staff, Council and Management Board bear no legal responsibility for any information exchange between participants of ETIS activities.

ETIS however expects all participants to its activities to oblige by all antitrust and competition rules applicable to their respective organisations and countries. Members are responsible for conducting

their own internal assessments to ensure compliance with these guidelines and applicable competition law.

6. OBLIGATIONS

- Participants in ETIS activities must ensure they are fully informed of, and compliant with, the requirements of this antitrust policy and the antitrust policy in their organisation.
- Participants should oblige by all antitrust laws applicable to their respective organisation.
- When uncertainty arises, participants seek legal clarification from their organisations' legal counsel.
- If a participant becomes aware of any behaviour that appears to violate this Policy, they should report it to the other participants and the ETIS Central Office.

7. PROMOTING A CULTURE OF COMPLIANCE

ETIS will actively promote a culture of integrity and compliance with anti-trust rules throughout the European telecommunications sector.

8. ADDITIONAL RULES

The ETIS Statutes and Confidentiality Rules are available upon request from the Central Office (info@etis.org).

9. ACTIONS IN CASE of NON-COMPLIANCE

If ETIS staff becomes aware of actions by an ETIS participant that may contravene the Antitrust Policy, it will notify the ETIS Council and the main representative of the organisation (e.g. Management Board member) and collaborate with them to investigate and address the issue. If a solution is not possible or the organisation refuses to cooperate, ETIS may consider suspending or terminating their partnership/supporting party/collaborator agreement.

If an ETIS staff member appears to be involved in a potential breach, the incident will be expedited to the attention of the ETIS Council. The Council will discuss the situation with the staff member and guide any actions needed to resolve the issue.

Version: 9th October 2025