

COMPETITOR POLICY

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POLICY
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Introduction

Describes Hector Rail in relation to its competitors.

Target Group

- All staff in Hector Rail
- All stakeholders in Hector Rail

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Competitor policy

Hector Rail welcomes competition. Our competitors stimulate us to constantly improve just as we contribute to our competitors' improvements. Competition is beneficial for customers as it strengthens the railway business and makes rail as a mode of transport more competitive compared to other modes of transport.

As a consequence, Hector Rail strives to develop professional relationships with our competitors. Hector Rail wants to see professional market behaviour, which means we are always willing to co-operate if this creates a more beneficial solution for the customer, provided it does not infringe on laws related to competition avoidance. It is also important to ensure that sensitive information concerning Hector Rail, its partners or stakeholders is never leaked to a competitor.

Behaviour

Hector Rail expects professional standards of conduct in relations between the serious actors in the rail business. Here are some practical examples of what Hector Rail means by professional behaviour:

- Never discredit competitors either in writing or speech
- Always be polite and friendly when meeting representatives from competing operators, but be very careful about disclosing information about Hector Rail or Hector Rail's partners or stakeholders
- In daily operations, try to help competitors if they face operational problems
- At all meetings with competitors the four eye policy (two Hector Rail representatives at the meeting) is valid.

Legal aspects

All contacts with competitors aimed at reducing competition are both illegal and counterproductive in the long term. Hector Rail will never accept illegal behaviour in this, or any other aspect of its business. All Hector Rail employees are prohibited from even indicating an interest in such behaviour, it being completely against the interests of Hector Rail. If indications in this direction are ever made by a representative from a competing company, representatives from Hector Rail must immediately make it very clear that this is unacceptable. It may be necessary to leave such a meeting. It is appropriate to make written notes from meetings with competitors.

Here are some examples of what is illegal:

- Disclosing information about rates and prices
- Market sharing
- Restricting Supply and Capacity
- Bid rigging
- Agreements regarding customers (to share, boycott etc)
- Disclosing information about business plans etc.

Information

Sensitive information about Hector Rail and/or its partners and stakeholders must not reach competitors. The company must ensure that such transfer of information never happens. The following areas are especially critical:

- Transfer of information when a Hector Rail employee starts working for a competitor
- Public information from the company
- Transfer through third parties, like business partners, personal friends, web forums, etc.
- Security in IT communication and storage
- Responsible behaviour in public places, like public transport

Validity

This policy is valid until further notice, but shall be reviewed by the Board every calendar year. The Managing Director is responsible for this.