

ANTI-COMPETITIVE CONDUCT POLICY OF RATEGAIN TRAVEL TECHNOLOGIES LIMITED ("THE COMPANY")

I. INTRODUCTION:

RateGain is committed to conducting business in a way that encourages fair competition, upholds ethical standards, and avoids anti-competitive behavior. The business understands the value of engaging in public and regulatory policy in a responsible and open manner while respecting the rights and interests of all stakeholders in market and public policy. This Anti-Competitive Conduct Policy details RateGain's adherence to these values and offers direction to staff members and stakeholders.

II. COMMITMENT AND POLICY STATEMENT:

RateGain is committed to conducting business ethically, openly, and in accordance with all relevant laws and rules, particularly the Competition Act of 2002. The company pledges to encourage healthy competition and abstain from anti-competitive actions. RateGain works to establish an environment that fosters moral corporate activity, both in terms of public policy and market determinants.

III. SCOPE AND APPLICABILITY:

This Anti-Competitive Conduct Policy is applicable to:

- all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with our Company; and
- such other persons, including those acting on behalf of our Company, as designated by the Compliance Officer from time to time.

If in doubt whether an act would breach this Policy, one must take a step back and ask oneself the following on a contemplated action:

- What is the intent – is it to build a relationship or is it something else?
- How would it look if these details were on the front page of a major newspaper?

Whenever faced with a doubt on the applicability of this Policy, consult the Ethics Counsellor or the Compliance Officer.

IV. COMPLIANCE FRAMEWORK AND ACCOUNTABILITY:

To ensure adherence to the anti-competitive conduct policy, RateGain has established a robust compliance framework. This framework includes information security processes, controls, and reporting mechanisms to monitor and enforce compliance with applicable laws and regulations. All employees, management, and stakeholders are held accountable for upholding this policy, and the reporting of concerns related to potential anti-competitive behavior is encouraged. Whistleblower channels and reporting mechanisms are available to ensure confidentiality and protection for those who come forward.

V. INFLUENCING PUBLIC POLICY:

In order to have a positive impact on public policy, RateGain understands how crucial it is to address problems and encourage ethical business practices. To ensure ethical and transparent participation in policy creation, the firm pledges to engage in ethical lobbying activities and work with industry partners. RateGain seeks to support a just and competitive business climate by actively participating in public policy conversations.

VI. INFLUENCING MARKET DETERMINANTS:

RateGain is committed to making informed business decisions and developing competitive strategies in compliance with applicable laws and regulations. The company prioritizes market research to understand customer needs, preferences, and industry dynamics. RateGain avoids engaging in any anti-competitive behaviors and instead focuses on differentiation through innovation, quality, and customer satisfaction. By doing so, RateGain aims to contribute to a healthy and competitive marketplace.

VII. TRAINING AND AWARENESS:

As part of its commitment to educating staff about unfair competition, anti-competitive behavior, and the law, RateGain regularly conducts training sessions and awareness campaigns. The organization commits to offering thorough training programmes to guarantee that workers are knowledgeable and prepared to make moral decisions. Additionally, by fostering a compliance culture inside the company, these programmes assist staff in identifying potential risks or infractions.

VIII. PERIODIC REVIEW AND IMPROVEMENT:

RateGain is dedicated to operating its business ethically, openly, and in accordance with all relevant rules and laws. The company's commitment to fair competition, avoiding anti-competitive practices, and respecting stakeholders' rights and interests is reinforced by the anti-competitive conduct policy. Additionally, we will monitor the effectiveness and review the implementation of this Anti-Competitive Conduct Policy, considering its suitability, adequacy, and effectiveness. By adhering to this policy, RateGain believes it can promote a competitive marketplace for all.