

SPIRAX-SARCO ENGINEERING PLC COMPETITION LAW COMPLIANCE POLICY FOR GROUP SUPPLIERS

Competition/antitrust laws and regulations (collectively, “**Competition Regulations**”) are designed to promote free and fair competition in business practices. Where this is achieved, efficient and innovative organisations, like Spirax-Sarco Engineering plc (“**Spirax**”) and its select suppliers, prosper and customers receive the best products at the best price.

Spirax and each of its operating companies (“**Group**”) expect the highest standards of conduct and integrity from each of its suppliers. These standards are reflected in the Supplier Sustainability Code, which sets out the Group's policy in a number of specific areas. The standards set out in this Competition Law Compliance Policy for Group Suppliers forms part of that Supplier Sustainability Code.

It is the Group's policy to conduct its business in accordance with the Competition Regulations of all the countries in which it operates and it expects the same from its suppliers. Competition Regulations apply to every aspect of our business and at every level: domestic, European, and international. Compliance of Group suppliers with all relevant Competition Regulations is non-negotiable. The Group holds these expectations of compliance for all suppliers, no matter where in the world they operate.

Examples of applicable Competition Regulations may include, but are not limited to:

- the United Kingdom Competition Act 1998, Enterprise Act 2002, and Enterprise and Regulatory Reform Act 2013; and
- the United States Sherman Act, Clayton Act, Hart-Scott Rodino Act, Robinson-Patman Act, and the Federal Trade Commission Act.

In line with relevant Competition Regulations, the Group prohibits any of its suppliers from engaging in the following types of conduct:

- entering into agreements (whether verbal or written) which have the object or effect of preventing, restricting or distorting competition;
- collusive behaviour between companies which replaces market uncertainty and independent decision making;
- abusive behaviour by companies that are dominant in their business market(s); and
- any other conduct which is prohibited by applicable Competition Regulation.

By way of example, suppliers should specifically refrain from any of the following practices:

- fixing prices for goods or services with competitors ;
- limiting or controlling production or availability of goods, services, technical development or investment with the intent of driving up prices or damaging a market;

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- sharing or “carving up” the market;
- exchanging commercially sensitive information with competitors;
- pricing a contract below cost as a predatory activity (e.g. setting prices so low that the business will make a loss); and
- any other conduct which is prohibited by applicable Competition Regulation.

There are serious adverse consequences for breaches of Competition Regulations, including potential criminal liability for individuals involved, the risk of substantial fines, penalties, and claims for damages, as well as lengthy investigations and proceedings. Spirax does not tolerate this kind of behaviour in its own business nor anywhere in its supply chain. Group suppliers must adhere to this policy and abide by all relevant Competition Regulations, supporting Spirax’s commitment to ethics and integrity throughout its business and supply chain.