



Global Handwashing Partnership Antitrust Guidelines for Partner Meetings

These Antitrust Guidelines are not comprehensive and do not cover everything under the local competition laws. The Global Handwashing Partnership will strictly comply with all rules and principles of all local competition laws in all meetings and daily operation. These Guidelines apply to all meetings, including committee meetings, member meetings and all other external meetings organized by the Global Handwashing Partnership. It is the responsibility of each member, and its representatives, to act and discuss only in full compliance with antitrust requirements. While Secretariat staff will regularly remind members of their obligations in this sense, the ultimate responsibility of complying with antitrust requirements and these Guidelines rests with each individual member and its representatives.

Some Global Handwashing Partnership members are competitors as sellers of hand hygiene materials, goods and/or products. No activities shall restrict, prevent or distort competition between these members or on the market. For this purpose, Global Handwashing Partnership activities will strictly comply with all national competition laws. As a reminder, an infringement of these laws could result in severe penalties (e.g., huge fines) both for individual members and for the partnership.

Key principles:

- Participation in any Global Handwashing Partnership activities must be voluntary, and we will not punish any member for its failure to participate in any of our activities or set standard (except for legal compliance purpose).
- There shall be no discussing or sharing of any commercially sensitive information in any meeting, including: price information; discounts and rebates; promotional terms or activities; production volumes or capacity; trade terms; product or business plans; cost cutting measures; standardization measures designed to prevent legitimate competition of some members or other non-member competitors; impeding launch dates of products; eventual passing of costs in sales price of products or not; non-public information regarding suppliers or customers; market shares; and sales in volume or value, etc. All meetings shall focus on non-commercial matters, rather than any commercial related execution.
- Discussions among members must not lead to any agreement or understanding regarding a division of geographic or product markets or lead to a collective refusal to deal or a boycott.
- Historic data may be provided to the Secretariat for the purposes of agreed projects, but in no circumstance shall such data be shared with other members or attributable to any individual member. The Secretariat can only share aggregated, non-identifiable, public and non-confidential data among the members, and sharing shall be strictly subject to the necessity of the information for the execution of the projects.
- Meetings shall be governed by an agenda prepared in advance. The meetings shall be recorded by a summary prepared promptly after the meeting.
- During a meeting or any other discussion, if any participant believes it is drifting toward impermissible discussion, the topic shall be postponed until appropriate legal review has occurred.

In any circumstance, each member is responsible for ensuring its own compliance with all applicable legal rules. We will not facilitate any anticompetitive activities among Global Handwashing Partnership members. We highly recommend that all members' representatives shall receive antitrust compliance training by their own legal department /counsel.