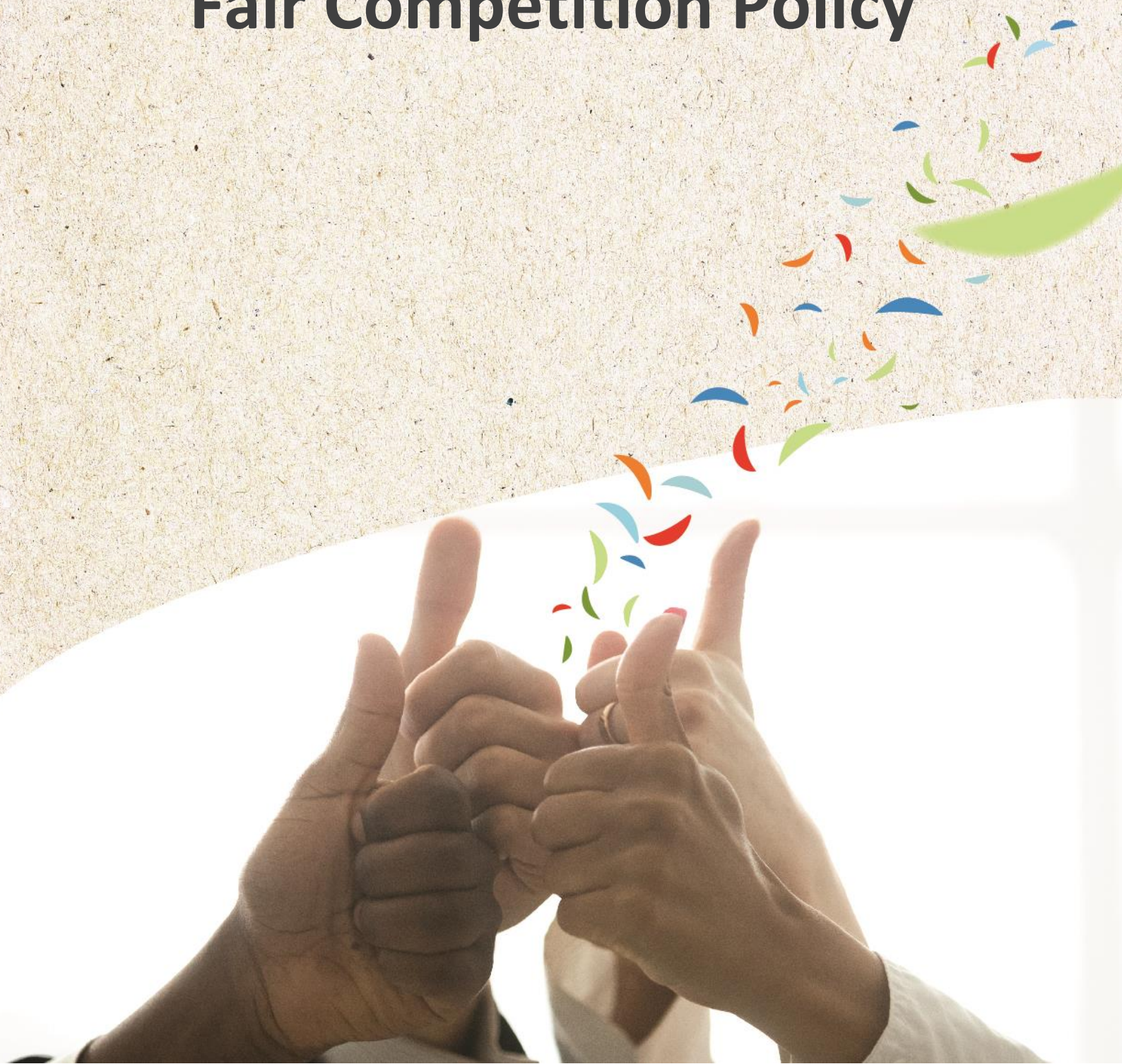




Fair Competition Policy



Introduction

Fair competition is essential for a functioning, free, strong, efficient and innovative economy. Fair competition ensures that the many participants in the market operate according to a common system of applicable laws. It also guarantees that customers and consumers can benefit from high-quality goods and services at fair prices.

Strauss Group is committed to supporting a free market and fair competition in every location where it operates, and strictly observes the provisions of competition laws meant to ensure the existence and fairness of competition. Strauss conducts its business in this manner not only because of the Company's determination to abide by the letter of the law, but because doing so is both proper and equitable. This adherence to the laws of free competition also reflect our values, our commitment to ensure ethical, responsible and sustainable business conduct, and the many values to which the Strauss Group is committed. By acting in this way, Strauss contributes to promoting fair competition and strengthens the trust that our Company receives from its stakeholders.

Strauss's commitment to promote fair competition is reflected in our organizational integrity. On every level of our business, and in every interaction with our consumers, competitors, customers, and suppliers, we act in accordance with strict ethical and moral standards. As a result, we earn their trust.

Strauss Group's Fair Competition Policy document describes how we implement the principles of fair competition and serves as a declaration of commitment by Strauss Group's management and its most senior officers. The document is also a guideline for managers and employees in our business, as well as a pledge to our employees, consumers, customers, business partners, suppliers, and all those with whom we interact.

Applicability

This Fair Competition Policy document applies to all Strauss Group employees, particularly those who have an impact on our conduct in the field.

Details

Conduct and Respect in the Competitive Space

Strauss acts in a competitive field and strives success and significant business achievements. We are always working towards becoming leaders in every field in which we engage, and to meet the goals we have set for ourselves. All of our activities are undertaken with the recognition of our responsibility to conduct ourselves ethically and properly, and reflect our respect for fair competition. Our commitment to maintaining fair and proper competition guidelines in our relationships with all stakeholders ensures that we treat all our competitors' products and activities with respect.

Strauss is committed to fulfilling all relevant provisions of countries' competition laws, and will not take part in any arrangement or activity prohibited by law. Consequently, all company employees are instructed to examine and ensure that their actions and engagements are permissible by law and performed in accordance with the parameters of the law. To ensure that they act accordingly, employees have access to relevant personnel and groups for consultation. Engaging in any activity prohibited by law could profoundly harm the company and its goodwill. Such behavior could result in investigations, heavy fines, and even imprisonment, thus further damaging the Company and its employees.

Ethical Commitment for the Promotion of Fair Competition

Strauss is committed to conducting its business in accordance with competition laws, and makes its best efforts to avoid undermining competition, including:

- Avoiding the misuse of our status;
- Ensuring respectful and appropriate competitive conduct;
- Prohibiting its employees and managers from participating in any harmful arrangements or activities prohibited by competition law. This includes refraining from price fixing, market or customer segmentation, bid rigging, and more;
- Avoiding any interference with any commercial conditions or conditions related to the conduct of our competitors.

Relationships with Customers and Suppliers

At Strauss Group, we believe in engaging in ongoing dialogues with all our interest holders. We also advocate transparency, fairness, and leadership in all matters related to corporate governance. Our relationships with all our stakeholders, and especially with our consumers, customers, clients and suppliers, are characterized by respect, integrity, and ethical conduct. These standards are maintained while we ensure our compliance with and thorough implementation of competition laws in order to promote productive, successful, and fair business practices.

Strauss strictly complies with fair competition guidelines and avoids any position or conduct which could adversely affect competition. Strauss' relationships with its suppliers are examined accordingly, and all engagements with suppliers are carried out within the framework of applicable competition laws.

Manner of Conduct Concerning Competition-Sensitive Information

Strauss sets strict guidelines regarding the collection and management of our business information. We instruct our employees that information about competitors should be collected from independent and public sources, without any contact or agreements with our competitors themselves. In addition, our employees are instructed not to exchange competition-sensitive information with competitors, whether directly, in the context of professional unions and conferences, or in any other way. The Company instructs its employees to strictly comply with this guideline in their conduct, and in any circumstance where they come into contact with competitors.

Personal Accountability

We expect every employee of the Group to act in accordance with the Group's ethical code and values, with competition laws, and with the guidelines according to which the Group conducts its activities. We also expect every Group employee to avoid engaging in any activity which could contravene these principles. In addition, our employees are expected to continue to work to achieve the Company's goals while strictly complying with the law, seeking consultation when needed, and operating in accordance with their moral judgment and common sense. Finally, we expect our employees to use all the tools and mechanisms available to them at Strauss to prevent any breaches of the law.

Compliance

We constantly act to guarantee compliance with all laws and regulations in the field of competition law in all the markets in which we operate, even going beyond the minimum requirements of the law. We are committed to maintain an appropriate compliance plan which outlines the code of conduct to be followed, ensures the involvement of our employees and management, and regulates tools that help supervise actual conduct.

Risk Assessment

Strauss regularly performs assessments of the risks related to competition law.

Internal Compliance plan in the Field of Competition

An internal compliance plan in the field of competition has been formulated taking into consideration the Company's relevant risks, its competitive environment, and of course, the relevant laws. This plan is updated periodically according to need. As part of its compliance plan, Strauss Group has established an appropriate enforcement mechanism to guarantee proper and appropriate conduct. The plan details the Company's expectations of its employees and managers and presents specific guidelines for conduct in a variety of circumstances and possible scenarios relating to competition law. In any case of doubt or ambiguity, the plan instructs our employees to consult the Company's internal compliance supervisor, as well as the Company's legal department.

Our plan also offers additional supporting compliance tools, a knowledge distribution system, dedicated procedures, an internal reporting and control system, and a failure correction system for the purpose of ensuring that the activities of the Company and its employees are conducted in accordance with all applicable competition standards.

The Company undertakes to its employees that any employee making inquiries with members of the consultation system team and/or contacting the internal compliance supervisor for the purpose of exposing or preventing any breach of the provisions of the law will be fully protected and supported by the Company's management and will suffer no harmful repercussions from such contact or reporting.

This document is intended as an addition to the documents and procedures as well as to the internal compliance plans that exist in the various companies and shall not be construed to derogate therefrom. The relevant company employees are directed to review and use all these internal guidance documents on their daily work.

Awareness and Training

We make intense efforts to communicate this policy to all relevant employees.

In addition, both new and long-time employees who might encounter issues regarding fair competition within the course of their duties undergo periodic training regarding these issues and the tools at their disposal. The Company ensures that this training takes place and documents employees' attendance. The Company also makes sure that employees understand the issues related to competition as well as the consequences arising from any breach of the law.

Concerns Raised or Fear of a Breach

For any question or inquiry concerning competition, including with respect to this policy document, employees are invited to contact and consult with their managers or Strauss's competition regulation manager. In addition, we encourage reporting to employees' direct managers, the competition regulation manager, the Company's internal compliance supervisor, or Strauss's head legal counsel regarding any concern about competition issues or any behavior which could represent a breach of this Policy. Anonymous or identified reports and complaints may also be submitted to the Company's internal auditor or Strauss's hotline at:

<https://report.whistleb.com/en/strauss>

Any employee who makes such a report or complaint in good faith will receive full Company support, even if it is ultimately determined that there is no basis for concern. For additional details, please see Strauss's Deference Procedure.

Publication

This policy document is available to Strauss Group's employees in our internal portal and is available to the general public on the Group's website.