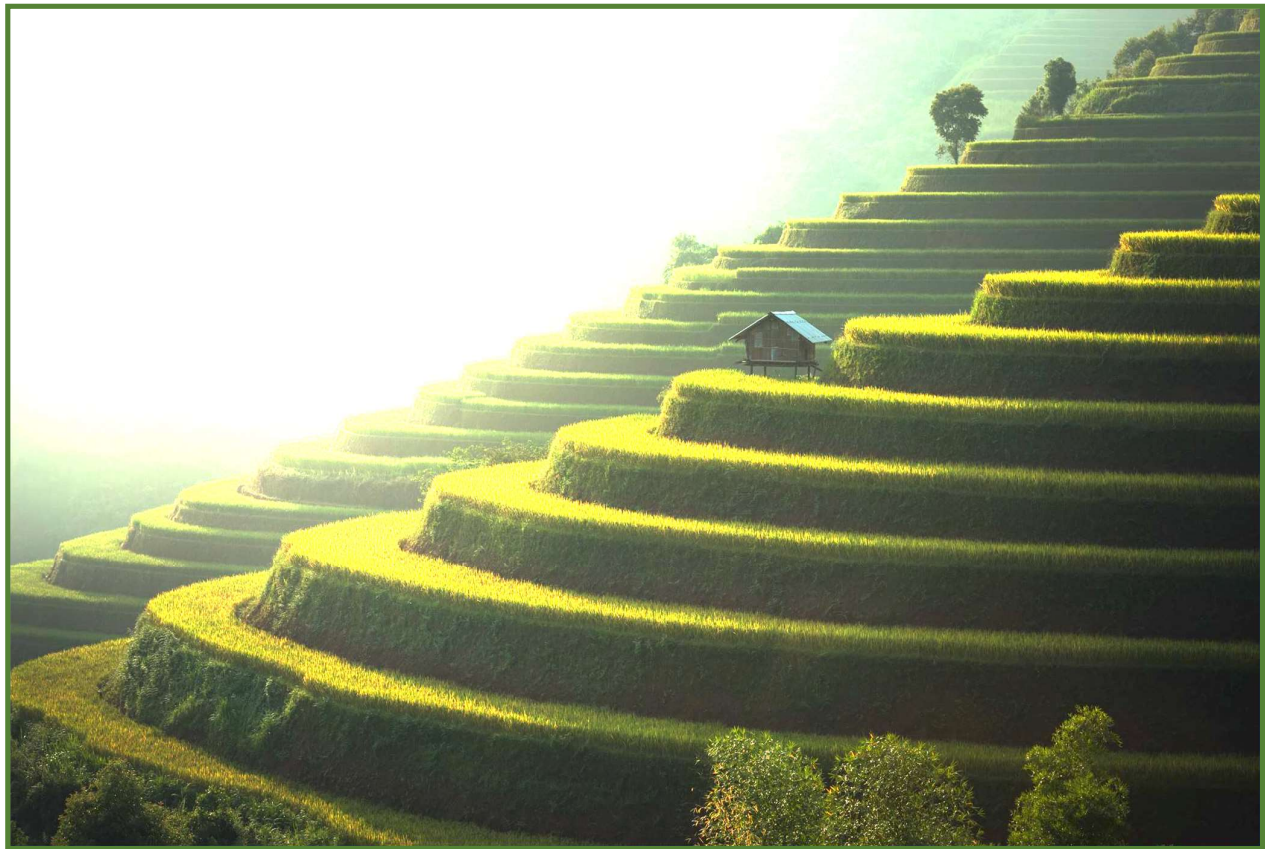

Sustainable Rice Platform Antitrust Compliance Policy



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About the Sustainable Rice Platform

The Sustainable Rice Platform e.V. (SRP) is a global multi-stakeholder alliance comprising over 100 institutional members from public, private, research, civil society and the financial sector. Originally co-convened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and private partners, SRP is an independent member association, working together with its partners to transform the global rice sector by improving smallholder livelihoods, reducing the social, environmental and climate footprint of rice production, and by offering the global rice market an assured supply of sustainably produced rice.

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Background

Market competition between businesses is critical for providing consumers with greater choice, higher quality goods and services, and lower prices when they transact in the marketplace. Antitrust laws promote such market competition by regulating the ability of firms to collude, price fix, monopolize, and engage in other anti-competitive business practices that deprive consumers the benefits of fair competition.

As a global multi-stakeholder membership organization, the Sustainable Rice Platform (SRP) brings together civil society, public sector actors, and all segments of the global rice supply chain to drive cooperation and innovation in the sustainable rice sector. Although the organizational design of SRP enables it to accelerate work to advance its mission, bringing together competitive market actors also introduces risks of contravention of antitrust laws and regulations of the countries in which they operate.

Purpose and Scope

The purpose of the **Sustainable Rice Platform Antitrust Compliance Policy** is to ensure that SRP, Members, and other stakeholders maintain a wholly pre-competitive position, in compliance with relevant national and international antitrust laws. As such, this Policy is intended to promote antitrust compliance, not to create burdensome obligations beyond what applicable antitrust law requires. All SRP Members' designated representatives, staff, consultants, and service providers (hereafter referred to as "participants") are bound to observe this Policy, and its compliance is a requirement of the Global Code of Conduct.

Terms and Definitions

Term	Definition
Commercially sensitive information	Company-specific information which, if communicated, could influence the future business conduct of actual or potential market competitors
Communication	The use of words, gestures, or body language to transmit information between two or more persons
Participants	Individuals affiliated with SRP and to whom this Policy applies. Participants are Members' designated representatives, Board members, Technical Committee members, staff, consultants, and service providers.
Antitrust Reminder	A statement read at the outset of each formal meeting to remind participants of their collective obligation to antitrust compliance

Antitrust Rules

1. Each participant shall be individually responsible for complying with applicable national and international antitrust laws.
2. Participation in SRP membership, meetings, and programs, including assurance, is voluntary.
3. No applicant for SRP membership that meets the necessary requirements shall be denied membership for an anti-competitive reason.
4. SRP Members shall be free to join other initiatives, alliances, and associations.
5. Participants shall not restrict how SRP Members, consultants, or service providers lawfully conduct their enterprises.
6. Participants shall not restrict the ability of SRP Members, consultants, and service providers to make independent and competitive business decisions.
7. Participants are obligated to exercise independent judgment in pricing services or products, working with supply chain actors, and selecting markets in which to compete.
8. Participants shall not communicate commercially sensitive information with other participants in SRP meetings, sponsored events, or electronic correspondence in connection with SRP, including but not limited to:
 - a. Prices or pricing policies, such as costs, discounts, promotions, changes or differentials, or credit terms
 - b. Trading terms or conditions
 - c. Capacity inventories, additions, or reductions
 - d. Purchasing or bidding strategies, plans, or actions
 - e. Marketing or advertising strategies, plans, or actions
 - f. Customer acquisition or business development strategies, plans, or actions
 - g. Proprietary technical developments
 - h. Sales volumes, values, quotas, or territories
 - i. Activities regarding joint market conduct, e.g., boycotts or blacklists
 - j. Market share.
9. Participants shall not pursue understandings or agreements, written or oral, express or tacit, between competitors about commercially sensitive information that is not available publicly.
10. Participants shall not use the SRP Standard System to attempt the restriction of competition along the global rice value chain or otherwise create obstacles to global production and trade.

11. Any participant who is found to violate this Policy may be subject to suspension or termination (Members), contract termination (consultants, service providers), or dismissal (staff) in accordance with relevant SRP Bylaws, policies, and contracts.
12. Antitrust law takes precedence if there is inconsistency between antitrust law and this Policy.

Meeting Protocol

The following protocol integrates with meeting procedures elaborated in the SRP Board Manual. It applies to all formal meetings in SRP where Members' designated representatives are present, namely of the General Assembly, Board, Executive Committee, Governance and Risk Committee, Finance and Business Development Committee, Technical Committee, and Board-authorized Task Forces.

1. Each meeting shall have a purpose. An agenda shall reflect this purpose and be circulated to all meeting participants with reasonable notice.
2. Each agenda shall include the standing agenda item "Antitrust Reminder" prior to the commencement of regular business.
3. During this agenda item, the meeting chair or designee shall read the Antitrust Reminder aloud and in full, which shall be reflected in the minutes.
4. If, during a meeting, one or more participants believes the meeting's discussion or conduct may have broached an anti-competitive matter, the participant shall notify the Chair immediately through a "point of order."
5. The Chair shall suspend discussion to review the point of order.
6. If the Chair agrees that sensitive information had been raised, the chair shall end discussion on the matter and underscore the importance of antitrust law and severity of noncompliance.
7. If, however, the Chair is unsure of the applicability of antitrust law to the discussion that had been temporarily suspended, the precautionary principle shall be employed until legal guidance can be sought; the matter shall be prohibited indefinitely from discussion until resolved.
8. Each meeting shall be recorded by minutes, including all steps in this Protocol that occurred, notably nos. 4-7, and the minutes shall be circulated according to standing practice.

Antitrust Reminder

The following statement shall be read by the Chair or designee at formal meetings where SRP Members' designated representatives are present:

Please be advised your participation in SRP requires familiarity with antitrust issues and what it means to avoid them. As a reminder, we all must refrain from any discussion or conduct that may infringe applicable antitrust law, including commercially sensitive information, such as pricing, costs, markets, bid strategies, future capacity additions or reductions, customers, or output decisions. This rule applies at all times, regardless of the setting or context of our interactions in connection with SRP.

Review Schedule

The SRP Board will review this Policy at least every three years and may amend the Policy at any time. The Secretariat will notify SRP Members, staff, consultants, and service providers of any future versions and will publish these versions on the SRP website at <https://www.sustainablerice.org>.

Related Documents

SRP Board Manual

SRP Confidentiality Policy

SRP Global Code of Conduct

SRP Membership Program Manual