

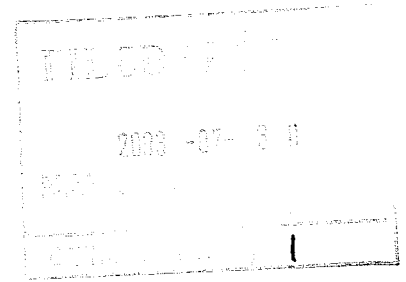
IN THE FEDERAL COURT OF CANADA
TRIAL DIVISION

BETWEEN:

HER MAJESTY THE QUEEN

- and -

AKZO NOBEL CHEMICALS BV



ACCUSED

INDICTMENT

THE ACCUSED, Akzo Nobel Chemicals BV, stands charged:

THAT IT DID, between approximately September, 1995 and August, 1999, the exact dates being unknown, in various locations outside Canada, unlawfully conspire, combine, agree, or arrange with Hoechst AG, Elf Atochem SA, and Clariant GmbH, the one with the other or others of them, together with a person or persons known and unknown, to prevent or lessen, unduly, competition in the production, manufacture, purchase, barter, sale, storage, rental, transportation or supply of a product, namely Monochloroacetic Acid and Monochloroacetate (together, "MCAA") in Canada, contrary to paragraph 45(1)(c) of the *Competition Act*, R.S. 1985, c. C-34, as amended.

Dated at Ottawa, Ontario this 16th day of July, 2003

D.D. Graham Reynolds, Q.C.
Duane E. Schippers
Of Counsel for the Attorney General of Canada

I hereby consent to the preferment of this Indictment pursuant to section 577 of the *Criminal Code of Canada*, R.S.C. 1985, c. C-46.

Dated at Ottawa, Ontario this 28th day of July, 2003.

Morris Rosenberg
Deputy Attorney General of Canada

Court File No. T -

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