



Anti-Competitive Practices Policy

Version Control

Version number	Date	Description of changes
V1.0	07 November 2023	
V2.0	18 February 2025	Updated sections: <ul style="list-style-type: none"> • <i>“Your obligations”</i> • <i>“Discussions with customers”</i> • Removed section: <i>“Conduct relating to a dominant market share”</i>
V3.0	04 March 2025	Contents updated
V4.0	15 January 2025	Updated the following sections: 1. Policy Statements, 2. Compliance, 3. Responsibilities Added the following section: 7. Responsibilities of Recruitment Department (further to CMA publishing <i>“Competing for talent”</i> guide - September 2025)

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1. Policy Statements

- 1.1. ETL is committed to complying with all legal obligations. We do not tolerate any anti-competitive behaviour, or behaviour which could lead to anti-competitive activity, or any legal, ethical, or moral breach of competition law.
- 1.2. ETL requires compliance with all applicable laws, including competition law. This policy extends to all business dealings and transactions in all countries that we operate in.

2. Compliance

- 2.1. All employees (permanent and temporary), contract personnel, consultants, intermediaries, agents and third parties acting on behalf of ETL are required to comply with this policy.
- 2.2. Full adherence to this policy is of utmost importance since failure to do so can lead to fines or criminal charges against you and / or the company.
- 2.3. Consequences of infringements of this policy could result in significant financial, legal and reputational implications.

3. Responsibilities

- 3.1. It is the responsibility of each employee to ensure that they are compliant and understand this policy.
- 3.2. Each employee whose job role means they could engage in anti-competitive behaviour shall undergo training on **competition law compliance**. It is their responsibility to ensure they are trained and understand the obligations placed upon them.
- 3.3. Any ETL employee who suspects a violation of this policy must speak up and raise the issue to their immediate manager, or in accordance with the company Whistle Blowing Policy.

4. Your obligations

4.1. It is your obligation to:

- Conduct all business dealings on behalf of ETL in accordance with this policy and all applicable laws
- Comply with competition law at all times
- Report any activity, transaction or dealing which you suspect may infringe upon competition law to the Finance Director or HR Director

5. Discussions with competitors

You must:

- Seek advice from The Finance Director or HR Director before accepting any social invitations from competitors or joining trade associations
- Remember all arrangements, including informal understandings will be illegal if they infringe on competition law, and may give rise to heavy fines on the participating business and risk criminal prosecutions
- Avoid all discussion of competition or competitive subjects with personnel from a competitor and make an obvious and clear action of breaking off such discussions should they arise
- Leave any meeting where anti-competitive discussions are taking place, and ensure that your actions are minuted

You must not:

- Discuss, recommend, or agree with competitors on any of the following matters:
 - Costs
 - Prices, including proposed changes or the methods of calculating prices
 - Proposed product launches or withdrawals
 - Plans to refuse to deal with specific customers or suppliers
 - The division or allocation of territories of customers
 - Marketing plans
 - Profitability and profit margins
 - Any other terms and conditions on the sale of products
- Remain at any meetings with competitors where competitive conditions are discussed, or where you believe the discussions or actions could risk breaching competition law

6. Discussions with customers

You must not:

- Try to control the pricing of any reseller customers or distributors
 - This does not apply if you are setting maximum resale prices or recommending resale prices
- Discuss the details of business terms with any customer in the presence of other customers or competitors
- Discuss with one customer ETL's dealings with other customers or make any commitments to one customer as to ETL's treatment of other customers
- Oblige or otherwise coerce customers to tell you if lower prices have been quoted unless through an approved price matching protocol

You may, however, accept information voluntarily given by customers as to the actions of competitors, including prices, terms, and any special promotions being offered.

7. Responsibilities of Recruitment Department:

- You must understand how competition law applies to labour markets.
- You must provide recruitment staff with training on competition law and how it applies in the recruitment context.
- You must ensure solid internal reporting processes are in place and that staff are aware of these and how they can use them.
- You must not agree with other businesses to fix wages.
- You must not agree with other business not to approach or hire each other's employees.
- You must not share competitively sensitive information about the business or employees with competing employers (either directly or indirectly; e.g. through an independent third-party provider).

8. Procedures for raising concerns under this policy

- 8.1. If you are concerned about any form of malpractice covered by this policy, you should raise the issue with the Finance Director or HR Director.
- 8.2. Concerns can be raised orally or in writing. When raising the concern, you may choose to either include your identity or remain anonymous. Once you have raised your concern, in the interests of everyone involved, this is a confidential process.

9. Further information

The Competition Act 1998 (CA98) is the main law covering competition in the UK.

Competition law guidance - GOV.UK (www.gov.uk)

[SME compliance at-a-glance guide \(publishing.service.gov.uk\)](#)

Should you have any questions or require clarification regarding our **Anti-Competitive Practices Policy**, please speak to Kevin Dunne (CEO).

10. Monitoring and review

10.1. This policy will be reviewed periodically by the Company and updated in accordance with legal requirements.