

QBD.33 Anti-Trust Policy

1. Introduction

This policy outlines our commitment to comply with UK anti-trust laws and regulations to promote fair competition and prevent anti-competitive practices. Our goal is to ensure that our business operations adhere to the principles of fair competition, benefiting both consumers and the market.

2. Scope

This policy applies to all employees, contractors, and third parties involved in our business operations.

3. Legal and Regulatory Compliance

We comply with the following UK laws and regulations:

- Competition Act 1998 – Prohibits anti-competitive agreements and abuse of dominant market positions.
- Enterprise Act 2002 – Provides for the investigation and enforcement of competition law, including criminal sanctions for cartel conduct.
- Consumer Rights Act 2015 – Enhances consumer protection and competition law enforcement.
- CMA Guidance – Provides detailed guidance on compliance with competition laws.

4. Anti-Competitive Practices

We strictly prohibit the following anti-competitive practices:

- Price Fixing – Agreements between competitors to fix prices, which can include setting minimum or maximum prices.
- Market Sharing – Agreements between competitors to divide markets or customers, which can include geographic or customer-based divisions.
- Bid Rigging – Collusion between competitors to manipulate the outcome of a bidding process.
- Abuse of Dominance – Practices by a dominant company that unfairly limit competition, such as predatory pricing or exclusive dealing.

5. Compliance Measures

To ensure compliance with anti-trust laws, we implement the following measures:

- Training and Awareness: Regular training for employees on anti-trust laws and the importance of compliance.

- **Monitoring and Reporting:** Continuous monitoring of business practices and a clear reporting mechanism for suspected anti-competitive behaviour.
- **Internal Audits:** Regular audits to ensure compliance with anti-trust laws and internal policies.
- **Legal Review:** Regular review of contracts and agreements by legal counsel to ensure compliance with competition laws.

6. Reporting and Accountability

All employees are responsible for adhering to this policy. Any breaches or concerns should be reported to the compliance department or relevant authorities. We encourage a culture of transparency and accountability to uphold the principles of fair competition.

Signed:



Siobhan Hamill
Managing Director
Date: 10/03/2026



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FACILITIES MANAGEMENT LTD