

CORNTHWAITE GROUP
Competition Law Compliance Policy

Last updated: 03/09/2024

1. COMPLIANCE WITH COMPETITION LAW

1.1 Cornthwaite Group is committed to ensuring compliance with all laws and regulations governing our business, including in relation to Competition law. We firmly believe in the principles of fair and efficient competition and do not engage in any anti-competitive conduct, including, but not limited to, agreements which restrict, prevent or distort competition.

2. CORNTHWAITE CONTRACT PRACTICES

2.1 Cornthwaite Group bids for contracts independently, without any agreement or arrangement with its competitors. This includes not:

- (a) sharing pricing information with competitors;
- (b) engaging in cover pricing or price fixing of any type;
- (c) entering into agreements with competitors to divide the market between competitors, either in relation to geographic areas or customer groups;
- (d) discussing terms and conditions of contract with competitors;
- (e) engaging in behavior that would foreclose the market to new competitors;
- (f) discussing sub-contractor or supplier arrangements with competitors;
- (g) engaging in bid rotation or bid suppressing; and
- (h) engaging in any behavior that may be considered bid rigging.

3. BREACH OF THIS POLICY

3.1 Any breach of this policy, or any aspect of Competition law, is considered a serious offence and will result in appropriate disciplinary action up to and including dismissal of that employee. Breach of Competition laws may also lead to personal penalties for individuals including fines and/ or criminal sanctions.

4. MAINTAINING AWARENESS AND TRAINING

4.1 All Cornthwaite Group employees dealing with third parties must be aware of this policy and will be reminded of its terms at regular intervals. All employees will receive annual training on Competition Law Compliance and this training will also form part of Induction for new starters, where it is appropriate.

This policy will be reviewed annually to ensure it reflects current legislation and regulation.

Signed on behalf of Cornthwaite Group



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Stuart Cornthwaite