

Competition Law Risk Mitigation Policy

1 Introduction

Competition benefits both businesses and consumers by encouraging innovation, efficiency, and productivity. At Altitude Angel, we are committed to conducting business with integrity and within the legal framework of competition law.

This Competition Law Risk Mitigation Policy is an essential component of our compliance strategy. Fully supported by the Altitude Angel Management Team, it establishes clear guidelines to ensure adherence to UK competition laws, including the Competition Act 1998 and the Enterprise Act 2002.

2 Scope

This policy applies to all employees, officers, and directors of Altitude Angel, including full-time, part-time, temporary, and contract workers. It covers all business activities within the United Kingdom, including interactions with customers, suppliers, competitors, and other stakeholders.

3 General Compliance Obligations

3.1 Anti-Competitive Agreements

Employees must not enter into agreements or engage in concerted practices with competitors that could restrict competition. Prohibited activities include:

- Price fixing – agreements on pricing or pricing strategies.
- Bid rigging – collusion to manipulate bidding processes.
- Market sharing – agreements to divide customers, territories, or products.
- Limiting production or supply – restricting market availability to control pricing.

3.2 Abuse of Dominant Position

Employees must not abuse any dominant market position by engaging in practices that harm competition, such as:

- Predatory pricing – pricing below cost to drive competitors out of the market.
- Tying and bundling – making the purchase of one product conditional on another.
- Discriminatory practices – applying different conditions to similar transactions without justification.

3.3 Compliance Training

Training sessions will be provided to ensure employees understand their obligations under UK competition law and the consequences of non-compliance.

3.4 Reporting Violations

Employees must report any suspected violations to the Legal Department via lca@altitudeangel.com. Retaliation against employees who report in good faith is strictly prohibited.

3.5 Cooperation with Authorities

In the event of an investigation by the Competition and Markets Authority (CMA) or other regulatory bodies, employees must fully cooperate and provide accurate and truthful information.

3.6 Third-Party Relationships

All business dealings with suppliers, customers, distributors, and other third parties must comply with competition law, avoiding any prohibited activities.

4 Consequences of Non-Compliance

Violations of UK competition law or this policy can result in severe legal and financial penalties, including:

- Fines of up to 10% of group turnover
- Director disqualification
- Civil damages claims
- Reputational harm

Employees found to have breached competition law or this policy may face disciplinary action, up to and including termination of employment.

5 Mitigation Policy

5.1 Individual Employee Risk Assessment and Required Training

To ensure appropriate training, employees will be assessed based on their level of exposure to competition law risks:

- High Risk – In-depth training, real-world case studies, and frequent refresher sessions.
- Medium Risk – Self-paced training modules with scenario-based learning.
- Low Risk – Basic awareness training as part of a broader compliance program.

5.2 Information & Reporting

Guidance and resources on competition law compliance, including real-world scenarios, can be accessed within the HR policies SharePoint or the [HM Government website](#).

Employees must report suspected breaches or risks to the Exec or Legal team immediately.

All reports will be logged confidentially and reviewed by Senior Management and the Legal Team to determine if an investigation is necessary.

6 Review & Continuous Improvement

This policy will be periodically reviewed and updated to ensure compliance with evolving UK competition law.

Additional reviews will occur if:

- A potential breach of competition law is detected.
- The company becomes subject to a regulatory investigation.
- The company expands into a new business area.
- A corporate acquisition takes place.

Employees will be informed of any updates to the policy and provided with appropriate training and guidance to maintain compliance.

By following this policy, we ensure that Altitude Angel operates with transparency, fairness, and full adherence to competition law.

7 Document Review

Date of Last Review	15/04/2024
Date of Next Review	14/04/2025

Version	Modified On	Modified By	Comments
1.0	15/04/2024	S Goldberg	Updated to new branding and added reference to legislation.
1.1	15/04/2024	S Bradley	Minor edits and formatting changes