



Royal Mail Group

Competition Law Policy

Ensuring everyone understands:

- How to comply with competition law
- When to seek advice
- How to raise a concern

Overview and Policy Statement

Royal Mail Group (RMG) is committed to conducting its business honestly, fairly and ethically. This commitment must be reflected in every aspect of our business conduct. Competition law aims to promote competition and ultimately protect consumers' interests by driving lower prices, better quality, more choice and more innovation. It is our policy to compete vigorously and fairly in compliance with the competition laws of all the countries where we do business. Ofcom imposes specific duties on us to protect competition between RMG Retail and Wholesale customers. For more information about this, see the Universal Service Provider Access Condition 5 (USPA5) Compliance Policy.

Our Responsibilities

We must:

- Always develop our commercial strategies independently of our competitors;
- Always act fairly in our dealings with customers and suppliers;
- Follow the Competition Law and Regulatory Risk Assessment (CLARA) process for any non-standard or bespoke commercial deals in the UK;
- Seek legal advice when considering a merger, acquisition, joint venture or similar type of deal;
- Follow the Group Compliance & Ethics process for joining trade associations or attending industry events;
- Immediately report any attempt, request or demand by a third party to share commercially sensitive information belonging to a competitor or otherwise breach competition law to Group Compliance & Ethics or Group Legal; and
- Contact Group Compliance & Ethics or Group Legal if you have any concerns about any competition law issue or if contacted by a competition authority (such as Ofcom or the Competition and Markets Authority).

We must not:

- Share or exchange any commercially sensitive unpublished information (such as pricing, costs or customer details) with a competitor, either directly or indirectly via a third party (such as a trade body or a customer). Where a customer is also a competitor, only share information that you would share with our customers. Follow the Information Security Policy for classifying information that is shared, as well as guidance from Group Legal;
- Receive or accept any commercially sensitive unpublished information about a competitor, either directly or indirectly via a third party, other than in the context of normal price negotiations with customers;

- Make any agreement (informal or formal, verbally or in writing) with a competitor or potential competitor without first taking legal advice (such as allocating customers, agreeing to fix prices or agreeing with another bidder in a tender process what the price of RMG's bid will be);
- Where RMG could be viewed as having a dominant position, adopt any business practice which may exploit customers, or exclude competitors from the market or make it harder for them to compete (e.g. by refusing to supply existing customers, pricing below cost to drive out competitors, or offering discounts in return for exclusivity); or
- Threaten or retaliate against anyone who refuses to agree to take part in any anti-competitive conduct or who reports any concerns that an offence has been committed.

Further Information

Competition law (known in some countries as antitrust law) prohibits behaviour which can damage competition between businesses or disadvantage customers. It requires businesses to avoid anti-competitive practices such as competitors fixing prices or sharing markets or customers.

In addition, businesses with a dominant market position (due to, for example, a large market share) have additional responsibilities not to abuse that position by exploiting customers or unfairly excluding competitors. For those markets where RMG may be viewed as having market power, it must comply with these additional rules to ensure that it does not abuse any position of dominance it may have.

Ofcom and the Competition and Markets Authority will take action against companies whose behaviour risks limiting competition.

Further Guidance and Documents

Group Compliance & Ethics provides guidance to assist you in complying with this Policy. All guidance is available on our [Compliance & Ethics Guidance Hub](#). The relevant guidance includes:

- Competition Law Guidance
- Competition Law Guidance – Industry Events

The Competition and Regulation team in Group Legal also maintains guidance documents related to competition law, available on [Access Legal](#). The relevant guidance includes:

- CLARA process and form
- CLARA parcels flowchart
- Guidance for Parcellforce on engaging with third parties
- Contact with competitors guidance
- Receiving competitor information guidance
- Competition law FAQs

Reporting Concerns

Do the right thing, speak up.

Everyone should be able to raise concerns without fear of retaliation.

You can talk to your line manager or you can Speak Up by calling the confidential helpline on 0800 090 3154 or using the online service at <https://royalmail.gan-compliance.com/p/speakup>.

We will take action.

Scope of Policy

This Policy applies to all our people working anywhere in the world for RMG and its wholly or majority owned subsidiary companies and joint ventures, except the GLS group, which maintains its own policies and procedures which are aligned with this Policy. Individuals include employees, casuals, agents, professional interims, agency workers, contract staff, consultants, officers and any other representative. This Policy does not form part of any employee's contract of employment and RMG may amend this Policy at any time.

Breach of this Policy

Any breach of competition law is a serious matter. Failure to comply with this Policy could potentially lead to substantial fines for RMG, unenforceable contracts, being prohibited from participating in certain tenders, third party damages claims and damage to our brand and reputation. Individuals could also face imprisonment, substantial fines and disqualification from acting as a director. RMG may report a breach or suspected breach to the appropriate authorities. Anyone found in breach of this Policy may be subject to disciplinary action up to and including dismissal. Where a business partner fails to comply with competition law, RMG may seek to terminate that business relationship.

Getting Help with this Policy

Contact Group Compliance & Ethics for advice on this Policy or the guidance documents supporting this Policy:

- 020 7449 8302
- group.compliance@royalmail.com

To request assistance from Group Legal, please contact

Regulation_And_Competition_Team@royalmail.onmicrosoft.com

Version Control

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| Policy reference number: | CLE/COMP/POL/013 |
| Version number: | 2.0 |
| Policy owner: | Global Director, Compliance and Sustainability |
| Policy effective from: | May 2021 |
| Last review date: | May 2021 |
| Next review date: | May 2022 |
| Approved by: | Global Director, Compliance and Sustainability |
| Approval date: | May 2021 |

This document is classified: **RMG – INTERNAL**
To request changes or updates to this document, contact the policy owner.