ANTI-COMPETITIVE BEHAVIOUR & COMPETITION COMPLIANCE POLICY

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1. Purpose

The purpose of this policy is to ensure CAPITAL SHIELD SECURITY LTD (“the Company”) conducts all business activities with integrity, transparency, and full compliance with UK competition and consumer protection laws. The Company upholds fair competition principles in all commercial dealings and maintains a zero-tolerance approach to anti-competitive behaviour, collusion, or any unlawful conduct that undermines the free market.

2. Scope

This policy applies to all employees, agency workers, subcontractors, consultants, suppliers, and partners who act on behalf of CAPITAL SHIELD SECURITY LTD. It covers all operations across the United Kingdom, including business development, tendering, human resources, procurement, subcontracting, and site-based operations.

3. Company Information

Legal Name: CAPITAL SHIELD SECURITY LTD

4. Legal Framework

This policy is established under the following UK legislation and regulatory guidance:
• Competition Act 1998 (Chapters I & II)
• Enterprise Act 2002
• CMA Guidance on Horizontal Agreements, Cartels and Labour Market Compliance (2023–2025)
• UK Government Anti-Competitive Practices Guidance (Gov.UK)

5. Prohibited Conduct

The Company strictly prohibits any of the following actions that may breach competition law:
• Price-fixing or coordination of tender prices with competitors.
• Bid-rigging or agreeing who will win or abstain from tenders.
• Market or customer allocation agreements.
• Exchange of sensitive commercial information (e.g., pricing, costs, pay rates, client lists).

• No-poach or wage-fixing agreements between competitors.
• Resale price maintenance or restricting customer choice.
• Abuse of market dominance or unfair treatment of smaller providers.

6. Risk Context and Business Relevance

CAPITAL SHIELD SECURITY LTD operates within the private security sector, offering SIA-licensed manned guarding, event, and facilities management services. Due to the competitive nature of contract bidding and subcontracting, the company recognises heightened risk of inadvertent breaches. Risks are managed through structured controls, training, monitoring, and transparent communication channels.

7. Responsibilities

Top Management holds overall responsibility for ensuring compliance with competition laws and effective implementation of this policy. Specific responsibilities are as follows:
• Top Management – Ensure adequate resources, leadership commitment, and compliance oversight.
• Compliance Officer – Monitor risks, maintain policy, deliver training, and act as contact for CMA enquiries.
• Line Managers – Promote awareness and report any potential breaches or collusive behaviours.
• All Staff – Attend training, avoid prohibited conduct, and report concerns immediately.

8. Procedures and Preventive Controls

• All commercial proposals must be developed independently.
• No employee may discuss pricing, costs, or pay rates with competitors.
• Tender documents and cost sheets must remain confidential.
• Any joint ventures or subcontracting arrangements must be approved by Top Management.
• Attendance at trade events requires pre-approval from Compliance Officer.
• Conversations with competitors must avoid any competitively sensitive topics.

9. Training and Awareness

All staff involved in sales, HR, operations, and procurement will receive mandatory annual competition compliance training. Refresher training will include recent CMA updates and sector-specific case studies relevant to guarding and FM industries.

10. Monitoring, Investigation and Disciplinary Measures

Regular audits will review tenders, subcontractor agreements, and communications. Any breach or suspicion of collusion will be investigated confidentially. Confirmed violations may lead to disciplinary action up to dismissal, termination of contracts, and notification to the CMA if legally required.

11. Dawn Raid Procedure

If officials from the CMA or any enforcement body arrive:

1. Verify identification.
2. Notify the Compliance Officer and Top Management immediately.
3. Do not obstruct officials but ensure they are accompanied at all times.
4. Do not delete, alter, or conceal documents.
5. Maintain a log of all actions taken during the visit.

12. Reporting and Whistleblowing

Employees are encouraged to report potential breaches anonymously via the internal reporting system or directly to the Compliance Officer. All reports will be handled confidentially, and no retaliation will be tolerated against those who report in good faith.

13. Policy Review

This policy shall be reviewed annually or following any significant legal, structural, or operational change. The Compliance Officer will update it in consultation with Top Management.

Approved

Managing Director

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This policy is reviewed on 01/01/2026