

Anti-Trust and Competition Policy

1. Purpose

The purpose of this policy is to ensure that Newfield Fabrications Co Ltd and all its employees, contractors, and business partners conduct business in full compliance with UK competition and anti-trust laws.

Newfield Fabrications Co Ltd is committed to fair competition and opposes all forms of **anti-competitive behaviour**, including price-fixing, bid-rigging, market sharing, and abuse of market dominance.

2. Scope

This policy applies to:

- All employees, officers, and directors of Newfield Fabrications Co Ltd;
- Contractors, consultants, agents, and intermediaries acting on behalf of the company;
- All suppliers, distributors, and business partners engaged in commercial relationships with Newfield Fabrications Co Ltd.

It covers all business activities conducted within the UK and abroad.

3. Legal Framework

This policy complies with the following legislation and regulatory standards:

- Competition Act 1998
- Enterprise Act 2002
- Consumer Rights Act 2015
- UK Subsidy Control Act 2022 (where applicable)
- EU and International Competition Law (where relevant to cross-border trade)

Enforcement of these laws in the UK is led by the Competition and Markets Authority (CMA).

4. Policy Statement

Newfield Fabrications Co Ltd operates with integrity and transparency. We:

- Compete fairly and honestly;
- Do not enter into any agreements or understandings that restrict or distort competition;
- Avoid any actions or communications that could be perceived as anti-competitive or collusive;
- Promote open markets and merit-based business practices.

5. Prohibited Conduct

The following activities are strictly prohibited under UK competition law and this policy:

5.1 Agreements or Collusion Between Competitors

Employees and representatives must **never** agree (formally or informally) with competitors to:

- Fix or coordinate prices, discounts, or credit terms;

- Divide or allocate customers, markets, or territories;
- Limit or control production or supply;
- Engage in **bid-rigging** or collusion in tenders or procurement processes;
- Exchange commercially sensitive information (such as costs, pricing, or customer lists).

5.2 Abuse of Market Power

If Newfield Fabrications Co Ltd holds a significant market position, it must **not abuse** that position by:

- Imposing unfair prices or trading terms;
- Refusing to deal with certain customers or suppliers without objective justification;
- Making contracts conditional on unrelated obligations ("tying");

5.3 Resale Price Maintenance

Suppliers must not impose or suggest fixed or minimum resale prices on distributors or retailers.

5.4 Information Sharing

The company must not share, request, or discuss confidential commercial information with competitors, including at trade association meetings, industry events, or online forums.

6. Relationships with Third Parties

- All agents, distributors, and business partners must comply with this policy.
- Any agreements or collaborations with competitors must be reviewed and approved in advance by the HR Department/MD.
- All joint ventures, mergers, or acquisitions must undergo competition law due diligence.

7. Employee Responsibilities

All employees must:

- Understand and follow this policy;
- Avoid discussions or actions that could breach competition law;
- Report immediately any suspected anti-competitive behaviour;
- Seek guidance from the HR Department before engaging with competitors or industry groups.

Failure to comply with competition law can result in severe penalties, including personal fines, imprisonment, company fines, and disqualification of directors.

8. Training and Awareness

Newfield Fabrications Co Ltd will provide regular training/instruction/Guidance on anti-trust and competition law to:

- Senior management and Commercial teams;
- Procurement, marketing, and supply chain staff;
- Any employees involved in pricing, strategy, or third-party relationships.

Attendance and understanding will be recorded for compliance purposes.

9. Reporting and Whistleblowing

Employees and business partners must promptly report any suspected breach of competition law through:

- The company's Whistleblowing Procedure;
- The HR Department;
- Or externally to the CMA via their reporting channels.

All reports will be treated confidentially and investigated appropriately.

No retaliation will be tolerated against anyone who raises a concern in good faith.

10. Consequences of Non-Compliance

Breaching competition law can have serious consequences, including:

- Fines of up to 10% of global turnover for the company;
- Personal fines or imprisonment for individuals (up to 5 years under the Enterprise Act 2002);
- Director disqualification for up to 15 years;
- Significant reputational damage.

Any employee found to have violated this policy will face disciplinary action, up to and including dismissal.

11. Policy Review

This policy will be reviewed annually, or whenever significant changes occur in UK competition law, the company's operations, or industry practices.

HR Department
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