

COMPETITION LAW POLICY (ANTI COLLUSION)



CEO Statement

I am committed to ensuring that all companies within Seddon and their employees operate their businesses with the highest degree of business and ethical standards.

Seddon is committed to upholding the principles of competition law and will not engage in any illegal practices or collusive behaviour that may prevent, restrict or distort competition to the detriment of our customers or potential customers. The director, senior managers and others with relevant supervisory responsibility understand that they have a duty to ensure that all employees are aware of and comply with the terms of the law as embodied in the policy.

Mr. J F Seddon

A handwritten signature in dark ink, appearing to read "J F Seddon", is positioned below the name.

CEO of Seddon
January 2025

The Policy

The Competition Act 1998, Articles 101 and 102 of the Treaty on the Functioning of the European Union and the Enterprise Act 2002 (the Law) prohibits any anti-competitive agreements between competing businesses and sets out the severe consequences for infringement. The overriding purpose of competition law is to ensure free and fair competition for the benefit of consumers and clients.

The Seddon policy on anti-collusive behaviour commits all directors and employees of Seddon to adhere to the requirements of the Law and places responsibility on everyone involved in the business to respect the confidential nature of their work and comply with the following:

- Prior to tender submission no employee will communicate to the proposed client or their appointed representative either a tender figure, an approximate value related to any tender, or any other details of a tender.
- Where there is a need to obtain quotations for services to be included in a tender figure then approximate values of works only should be provided and with the express authority of a company director.
- No employees will enter into any discussions or enter into verbal or written agreement with another party to refrain from pricing.
- No employee will enter into discussions or verbal or written agreement with another party to withdraw their own or another party's submission bid/tender.
- No employee will collude with another party in any way that would cause the improper fixing or adjustment of a bid/tender.
- Employees will not enter into any data sharing exercise with competitors or supply chain and must not discuss prices, terms and conditions of supply of the services, future intentions or changes of prices or suppliers.
- Any price discussions with the supply chain must not prevent, distort or restrict competition.
- Employees must disconnect telephone conversations or leave meetings if a competitor engages in discussion on inappropriate price sensitive or market share topics
- For more information please refer to [Competition Law Procedure LEG-PROC-002](#).

Involvement of the client or customer in discussions or arrangements between competitors will prevent a breach of this policy.

Statement of Managing Director

I, Jonathan Seddon, as Managing Director of Seddon Construction Limited (the Company) wholly support and endorse this policy and together with the senior management am committed to ensuring that this policy is understood and adhered to throughout the Company at all times.

I undertake to ensure that all necessary procedures are in place for continuous compliance and to regularly monitor the same.

Mr. J F Seddon



Managing Director of Seddon
May 2025

Acknowledgement by Employee

I acknowledge that this policy replaces any previous competition law policy that I have signed and is hereby incorporated as part of my principal terms and conditions of employment.

I have been advised on the relevant Law and the implications of this policy and I confirm that I have understood this policy and how to comply with the Law.

I understand that if I breach any aspect of the Law the Company will take disciplinary action against me.

Finally, I acknowledge that if I have any concerns about anti-competitive behaviour or possible breach of this policy by any person or become aware of anything that concerns me then I must immediately discuss the matter in confidence with a director, the Company Secretary or the legal department of the Company.

Signature

Printed Name

Date