



TIMESING
HONEST SUPPORT, PRECISE ADVICE.

COMPETITION LAW POLICY



1 Introduction

TIMESING is committed to conducting business fairly, ethically and in compliance with all applicable competition and antitrust laws.

We recognise that effective competition benefits clients, suppliers, employees and the wider economy by encouraging innovation, efficiency, quality and value.

This policy establishes the standards expected of all employees, directors, consultants, contractors, suppliers and representatives acting on behalf of TIMESING.

TIMESING will not engage in any anti-competitive practices and expects all associated persons to conduct business honestly, independently and lawfully.

2 Purpose

The purpose of this policy is to:

- Promote compliance with competition and antitrust legislation.
- Protect the reputation and integrity of TIMESING.
- Ensure that all commercial decisions are made independently and fairly.
- Prevent anti-competitive behaviour.
- Provide guidance on acceptable business conduct.
- Reduce the risk of legal, financial and reputational damage.

3 Legislation

TIMESING is committed to complying with all applicable competition legislation including:

- Competition Act 1998.
- Enterprise Act 2002.
- Relevant retained European competition law principles.
- Any applicable competition legislation in countries where we provide services.

Failure to comply with competition law may result in significant financial penalties, criminal sanctions, director disqualification and reputational damage.



4 Anti-Competitive Conduct

TIMESING prohibits any conduct that may restrict, distort or prevent fair competition.

Employees, suppliers and associated persons must not:

- Agree prices or fee levels with competitors.
- Discuss pricing strategies with competitors.
- Share commercially sensitive information with competitors.
- Agree to divide clients, territories, projects or markets.
- Coordinate bids, tenders or quotations with competitors.
- Exchange confidential information regarding future business opportunities.
- Participate in any arrangement intended to distort competition.

All commercial decisions must be made independently and solely in the interests of TIMESING and its clients.

5 Tendering and Procurement

TIMESING is committed to fair and transparent tendering practices.

When preparing bids, tenders or quotations, employees and suppliers must:

- Prepare submissions independently.
- Maintain confidentiality of pricing information.
- Avoid discussions with competitors regarding bids or tenders.
- Ensure all tender information remains secure.
- Report any request or approach that may constitute bid-rigging or collusion.

Under no circumstances may TIMESING participate in any arrangement intended to manipulate the outcome of a procurement exercise.

6 Competitor Contact

Contact with competitors is not prohibited where there is a legitimate business reason.



However, employees and suppliers must exercise caution when engaging with competitors through:

- Industry events.
- Professional bodies.
- Networking events.
- Conferences.
- Trade associations.

Discussions must not include:

- Pricing.
- Future commercial strategies.
- Client allocation.
- Market sharing.
- Tender opportunities.
- Confidential business information.

Where any inappropriate discussion occurs, the TIMESING representative must immediately withdraw from the conversation and report the matter to management.

7 Commercial Information

Commercially sensitive information must be protected at all times.

This includes:

- Pricing structures.
- Tender submissions.
- Profit margins.
- Client information.
- Commercial strategies.
- Business plans.
- Future opportunities.



Such information must not be disclosed to competitors or any third party without proper authority and a legitimate business reason.

8 Responsibilities

8.1 Directors

The Directors are responsible for:

- Promoting compliance with competition law.
- Providing appropriate guidance and oversight.
- Investigating potential breaches.
- Maintaining a culture of ethical business conduct.

8.2 Employees and Suppliers

Employees and suppliers are responsible for:

- Complying with this policy.
- Avoiding anti-competitive conduct.
- Exercising good judgement in commercial dealings.
- Protecting confidential information.
- Reporting concerns promptly.

Any uncertainty regarding competition law issues should be referred to management before any action is taken.

9 Reporting Concerns

Any employee, consultant, contractor or supplier who becomes aware of conduct that may breach competition law must report the matter immediately to:

Laila Pacheco (Administrative Director)

Reports will be treated seriously and investigated appropriately.

No individual will suffer detrimental treatment for reporting genuine concerns in good faith.



10 Breaches

Any breach of this policy may expose both the individual and TIMESING to significant legal and financial penalties.

Employees who breach this policy may be subject to disciplinary action, including dismissal.

Suppliers, contractors and consultants who breach this policy may be subject to contract termination and legal action.

Where appropriate, TIMESING may report unlawful conduct to the relevant regulatory authorities.

11 Implementation, Maintenance and Review

This policy will be reviewed annually or when there is a change in circumstances, in work practices or the introduction of new legislation.

This statement has been approved & authorised by:

Name: Paschal Walsh
Position: Managing Director
Date: 1 September 2024