



Traffic Open Products and Specifications

COMPETITION LAW POLICY

1. Introduction

1.1. Traffic Open Products and Specifications Limited (**TOPAS**) values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the members of the Company's Management Board as well as others acting on the Company's behalf are key to maintaining these standards.

1.2. The purpose of this document is to set out the Company's policy in relation to competition law and anti-competition practices. The policy applies strictly to all Management Board members. All members are required to comply with the relevant UK Acts and EU Regulations.

2. Understanding and recognising anti-competitive practices

2.1. This policy is made in pursuant to the Competition Act 1998, the Enterprise Act 2002 and has due regard to Article 101 of the Treaty on the Functioning of the European Union (TFEU).

2.3. Chapter 1 Competition Act 1998 prohibits any agreement or concerted practice which has the object or effect of preventing, restricting or distorting competition less an exemption applies. Prohibition covers formal written agreements and also "gentlemen's agreements" and other kinds of informal arrangements and understandings, oral or in writing and whether or not intended to be legally enforceable, including decisions of trade Associations and its rules and regulations that may limit members' commercial freedom of action.

3. TOPAS Policy

3.1 This competition law policy applies to all activities of **TOPAS** including the Management Board and sub-groups representing and/or acting on behalf of **TOPAS**.

3.2 Activities include the holding of business meetings, representation at industry events, the collection and dissemination of statistics, and use of its website



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4. TOPAS representatives' responsibility

4.1. In participating in an **TOPAS** activity all representatives on behalf of **TOPAS** are required to:

- Co-operate fully with **TOPAS** policy of compliance with competition law
- Familiarise themselves with the provisions of competition law
- Consider the competition law aspects of any **TOPAS** work they are involved in and if appropriate take relevant advice before voicing an opinion, exchanging information, committing to a course of action, taking a decision or reaching an agreement
- Ensure that meetings are properly conducted in accordance with the **TOPAS** Terms of Reference.

4.2. Representatives must avoid any action, decision or agreement that might suggest **TOPAS** is used as a vehicle to facilitate, or is a party to, any unlawful conduct under competition law.

5. Management responsibility

5.1. The **TOPAS** Administrator will consider a compliance audit against its competition law policy to provide reasonable assurance that the policy is working effectively and to enable risk areas to be identified and addressed.

5.2. This policy shall be reviewed every two years.

Dated: November 2018

Ratified by the Management Board:

Signed (Chair)

On behalf of the Management Board

Policy review date: November 2020