

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Competition Compliance Policy

Introduction

In the UK anti-competitive behaviour is prohibited under Chapters I and II of the Competition Act 1998 (“the Act”). In addition, the Competition and Markets Authority (“CMA”) has the power to apply and enforce Articles 101 and 102 of the Treaty that prohibits anti-competitive behaviour in the EU.

The Act prohibits agreements and conduct which may have an adverse effect on competition within the UK and there are similar requirements throughout the EU. This includes informal or verbal agreements (and even unspoken “undertakings”), gentlemen’s agreements, market behaviour based on co-operation, exchange of commercially sensitive information between competitors and decisions or even recommendations of trade associations. In essence, Arran Isle is required to act independently in its markets and sell products fairly and honestly on the basis of price, quality and service.

The UK government has indicated that it has no plans to make fundamental changes to the Competition Law framework after the country leaves the EU on January 31st 2020. Current UK Competition law is very closely based on EU Competition law Articles 101 and 102 and will remain in force following Brexit. Thereafter, UK Legislation is currently expected to remain closely aligned with EU Competition law. EU Competition law will still apply directly in the UK until the end of the Brexit transition period currently expected to be the end of 2020. It will subsequently continue to apply to UK businesses engaging in conduct affecting the EU market although the European Commission is unlikely to be able instigate an onsite investigation in a non EU country.

Policy

The Board of Arran Isle Limited is committed to ensuring that all companies in the Group comply with best competition practices and that commercial strength is not abused so as to gain unfair advantage. All employees must comply with the Act.

This policy statement together with appropriate mandatory training is designed to educate relevant Group employees on the key principles of competition law as they apply to Arran Isle. If you are in a role where competition issues may apply, it is your responsibility to comply with the Group’s competition compliance programme.

Procedures

Competition law is complex and the applicable legal rules are not always clear with respect to every situation that may arise in connection with Arran Isle’s business operations. Utmost caution is therefore required. Furthermore, since an investigation could be commenced based upon inferences drawn from business conduct that may in fact be legitimate, it is important that employees be seen to comply with the Act, as well as complying in actual fact. Detection and prevention of potential problems at their earliest stage is the objective of Arran Isle’s competition compliance programme.

Infringement of the Act can have serious consequences for the Group and, consequently, any failure on the part of an employee to respect the Group’s compliance policy will be taken very seriously and in appropriate circumstances will result in disciplinary action.

Questions or concerns about the administration of this policy or the application of the Act to specific situations should be directed to the Arran Isle Head of Corporate Services.

**Arran Isle Limited and its Subsidiary Companies (“Arran Isle”)
Competition Compliance Policy**

Implementation & Review

This policy will be reviewed annually by the Group Board of Directors and implemented and maintained by senior managers and relevant employees who interact at any level with customers, suppliers and other external parties.

Communication

It is the responsibility of the legal entity or business unit’s Managing Director (or equivalent) to ensure that this policy is regularly communicated to all employees and to all new employees when they join the business.



**Martin Wardhaugh
Group Chief Executive
January 2020**