

Competition Compliance Policy

Introduction and Commitment

Capital Sky Ltd requires its subsidiaries, divisions, and associated entities to comply with the competition laws of the United Kingdom and any other jurisdictions in which it operates. This includes ensuring that all business dealings, commercial decisions, and transactions are conducted fairly, transparently, and in a way that does not restrict or distort competition.

This policy applies across all areas of operation and to all personnel engaged by Capital Sky Ltd. This includes directors, employees, agency workers, contractors, consultants, intermediaries, agents, and any third parties acting on behalf of the company.

Capital Sky Ltd operates a zero-tolerance approach to anti-competitive behaviour. The Whistleblowing Policy is available to support this policy and should be used where any individual becomes aware of, or reasonably suspects, a breach of competition law.

This policy does not form part of any employment contract but is issued to all personnel and will be reviewed regularly to ensure it remains current and appropriate.

Purpose of This Policy

The purpose of this policy is to ensure that Capital Sky Ltd conducts all business activities in full compliance with competition law and maintains fair and lawful trading practices at all times.

The policy is intended to prevent any conduct that could result in anti-competitive behaviour, reputational damage, regulatory action, or harm to clients, suppliers, or competitors.

Prohibited Competition Behaviour

Competition law prohibits any agreement or arrangement that has the object or effect of preventing, restricting, or distorting competition.

This includes conduct relating to pricing, tenders, customers, territories, market allocation, supply levels, or commercial strategy.

Prohibited behaviour includes price fixing, bid rigging, market sharing, limiting supply or output, exchanging commercially sensitive information with competitors, and abusing a dominant market position.

These restrictions apply whether conduct is formal or informal, written or verbal, direct or indirect, and whether or not it is ultimately implemented.

Digital and Cyber Security Considerations

Employees must ensure that the use of digital systems, communication tools, and cloud platforms does not create any risk of breaching competition law.

Commercially sensitive information, including pricing, tender data, and strategy, must only be accessed and shared using approved Capital Sky systems. It must not be stored or transmitted using personal email accounts, personal devices, or unapproved cloud services.

Employees must not use messaging applications, online forums, or digital groups to communicate with competitors regarding commercial matters or sensitive business information.

Any suspected cyber security incident or data exposure involving commercially sensitive information must be reported immediately in line with company procedures.

Employee Responsibilities

All personnel are required to conduct themselves independently and competitively in all business activities.

Employees must avoid any contact or communication with competitors that relates to pricing, costs, margins, tender submissions, or future business intentions. All tendering and pricing decisions must be made independently and without coordination with competitors.

Employees must maintain strict confidentiality over all commercially sensitive information and seek guidance if there is any uncertainty regarding compliance with competition law.

Employees must report any suspected or actual breach of this policy immediately through the Whistleblowing Policy or senior management channels.

Employees must not engage in any discussions, arrangements, or behaviours that could influence market outcomes or restrict competition.

If such a situation arises, employees must withdraw immediately and report it.

Third Parties and Supply Chain Compliance

All subcontractors, consultants, suppliers, agents, and third parties acting on behalf of Capital Sky Ltd must comply fully with this policy.

Where appropriate, contractual terms will include obligations to comply with competition law. Failure to comply may result in termination of engagement and, where necessary, legal or regulatory action.

Consequences of Non-Compliance

Failure to comply with competition law can result in serious consequences for both the company and individuals involved.

These may include significant financial penalties, criminal prosecution of individuals (including fines or imprisonment), civil claims for damages, exclusion from tendering opportunities, regulatory investigations, and reputational damage.

For individuals, breaches of this policy may result in disciplinary action up to and including dismissal.

In serious cases, matters may also be referred to regulatory or law enforcement authorities.

Policy Review

This policy will be reviewed regularly and at least annually to ensure it remains compliant with applicable legislation and best practice guidance.

Name: Martin Maloney

Position: Chief Executive Officer

Signature:



Dated: 15/05/2026

Latest Review Date: 15/05/2027