

# Manual

Manual for

# **Competition Compliance and Business Associations**



# Manual for Competition Compliance and Business Associations

## Note

The project “Fostering competition law and policy and competition culture in Albania” aims to strengthen the effective implementation of competition law and promote a culture of compliance among public institutions and private sector stakeholders in Albania. Implemented by UNCTAD in cooperation with the Albanian Competition Authority, the initiative contributes to enhancing market efficiency, consumer welfare, and sustainable economic development.

A key component of the project is capacity-building and advocacy, including the organization of specialized training activities for judges and public officials, and awareness-raising activities targeting the business community.

As part of its advocacy and outreach efforts, the project has developed sector-specific competition compliance manuals for the telecommunications and health sectors, as well as for business associations. These manuals provide practical guidance to companies on identifying and preventing anti-competitive conduct, implementing internal compliance programmes, and aligning business practices with national and international standards.

The manuals are the result of over 30 interviews with Albanian stakeholders, including representatives from public institutions, business associations, and private enterprises, lawyers and academics ensuring that the recommendations reflect the specific realities and challenges of each sector.

## Foreword

This guide provides practical advice for businesses on how to implement effective competition compliance programs, with a specific focus on business associations. It also highlights the important role that these associations can play in promoting competition compliance among their members, encouraging integrity and fostering a competitive market environment.



# Manual for Competition Compliance and Business Associations

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More information on the project is available at <https://unctad.org/project/fostering-competition-law-and-policy-and-competition-culture-albania>. (email: [ccpb@unctad.org](mailto:ccpb@unctad.org))



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## !/? Common misconceptions about competition compliance

“Are business associations really concerned by competition law? This seems to be relevant for firms, not associations.”

“Are business associations obliged by law to design and implement a compliance program? It is costly and takes time”

“Is it worth? In my opinion, there is no anti-competitive behaviour in our sector”

But....



### Why compliance still matters

- *“Business associations can be held liable for anti-competitive conduct, not only firms”*
- *“Some members are asking questions about the business association’s measures to prevent competition infringements and are considering leaving if we have not taken the appropriate actions in this regard”*
- *“Our members want to scale and go global, and their clients start asking if they have put in place measures to fight against anti-competitive conduct”*
- *“Our members want to establish cooperation agreements and JV, and their business partners require that they have put in place a competition compliance program and trained my staff”*

### Business associations should create competition compliance programs because:

- It builds trust with members and consumers.
- It has a positive impact on your reputation and, therefore, on members’ retention.
- It can also encourage new members to join.
- It enhances your ability to attract talent – staff feel more committed to associations that have values, such as respecting a competition level playing field, and act accordingly.
- The consequences of an infringement of competition law can be very costly (high fines, civil damages, etc.) and business associations can also be held liable for competition law infringements.



## 1. What is competition law?

Competition law protects businesses and the economy as a whole, by ensuring that businesses are able to enter a market and are not subject to abusive or harmful practices. Competition law is not about protecting specific companies or competitors, but rather about protecting all businesses.

By protecting the competitive process, competition law results in:

- Lower prices for all: Companies generally aim at profit maximization, and can sell more goods and services by lowering prices.
- Better quality: Businesses can attract more customers and expand their market share, by improving their quality of goods and services. Quality can mean various things: products that last longer or work better, better after-sales, technical support, or also friendlier and better service.
- More choices: In a competitive market, businesses will try to make their products stand out from the rest. This results in greater choice for customers, which allows them to select the product that offers the right balance between price and quality.
- Innovation: To produce new and better products, businesses need to be innovative in their product concepts, design, production techniques, and services, among other things.
- Better competitors in global markets: Competition within national markets also helps make national companies stronger outside the country — and able to hold their own against global competitors.

In Albania, competition is regulated by Law no. 9121, the Albanian Competition Law, first adopted in 2003 and last amended in 2010. This framework aligns with international and European Union competition law principles, aiming to promote market efficiency and protect consumer welfare.

Under competition law there are different types of infringements.



# Manual for Competition Compliance and Business Associations

## 1.1 Restrictive horizontal agreements - illegal relations with competitors

Agreements between two or more competitors (real or potential) are prohibited when their purpose or effect is to restrict competition. As a general rule, the following agreements between competitors are considered to have such purpose or effect:

- Price fixing or setting harmful commercial conditions.
- Market sharing (products, customers, or geographic zones) or sources of supply.
- Limiting production, capacities, investments, or technical progress.
- Boycotting a supplier, customer, or business partner.

For competition purposes, the term “agreement” is very broad. It includes not only a formal written agreement (for example, a contract or letter of intent), but also an oral declaration of intentions, a verbal agreement, gentlemen’s agreements, a tacit agreement (for example, exchange of opinions or information), or uniform and conclusive conduct by two or more parties.

## 1.2 Restrictive vertical agreements – relations with distributors, suppliers and manufacturers

Vertical agreements are arrangements between companies operating at different stages of the production, distribution, or supply chain—such as manufacturers and retailers, or suppliers and distributors. Not all vertical agreements are illegal—only the ones that seek to restrain competition are problematic. Therefore, the assessment of pro-competitive and anti-competitive effects of vertical agreements is complex and must be done on a case-by-case basis.

In general, vertical agreements where the supplier’s and buyer’s market share exceed 30 per cent may be considered harmful and should be carefully assessed. Moreover, and independently of the market shares held by the parties, competition law prohibits vertical relations involving restrictions, such as:

- **Resale price maintenance** - when working with distributors or other third-party retailers, competition laws generally prohibit companies from fixing resale prices for their products or services to end customers. Maximum or recommended prices are permitted.
- **Restrictions on sales to certain customers or in specific territories**- in general, and with some narrow exceptions, competition rules prohibit suppliers from imposing restrictions on customers or territories.
- **Preventing effective use of the Internet** - In general, and with narrow some exceptions, competition law does not permit the supplier to prevent the effective use of the Internet by the buyer or its customers for selling the acquired goods or services.



# Manual for Competition Compliance and Business Associations

## 1.3 Abuse of dominant position

Competition law also prevents companies that have a dominant position in a relevant market from engaging in practices that can distort competition.

A company holds a dominant position when it can significantly influence market conditions — such as prices, output, or innovation — without needing to align its behaviour with what other market players do. The existence of a dominant position derives from a combination of several factors that, taken separately, are not necessarily determinative:

- The existence of **large market shares**. In particular, this is the case when a business or other actor holds a market share of 40 per cent or above.<sup>1</sup>
- The existence of **barriers to market expansion and entry** that prevent competitors from expanding their activities in the market or that prevent potential competitors from entering the market.<sup>2</sup> Barriers to expansion and entry may consist, for example on the existence of tariffs or quotas, sector-specific regulations, licensing requirements, authorisation requirements, intellectual property rights, an established distribution and sales network, economies of scale and scope, vertical integration, access to critical raw materials or high sunk costs.
- Customers with **countervailing buyer power**. Countervailing buyer power can prevent even an undertaking with a high market share from acting to an appreciable extent independently of customers.

Having a dominant position is not illegal under competition law. However, when a company uses that position to eliminate competition, exploit customers, or prevent others from entering the market, it is considered abusive. This can manifest in several ways:

- **Excessive or predatory pricing:** A company may set unreasonably high prices to extract significant profits unjustly. Alternatively, it might set prices very low to drive competitors out of the market (known as predatory pricing), intending to raise prices once competition is weakened or eliminated.
- **Exclusive dealing and loyalty rebates:** Dominant firms might tie customers to exclusive deals or offer rebates conditional on buyers purchasing exclusively or primarily from them. This practice can limit the ability of competitors to access the market.

<sup>1</sup> Guideline On the applicability of articles 8 and 9 of Law 9121 dated 23.07.2003 'On the Protection of Competition'; Guidance on the Commission's enforcement priorities in the application of Article 82 of the EU Treaty to abusive conduct by dominant undertakings (2009/C 45/02) (OJ C 45, 24.2.2009, p. 7–20). Available at: [https://caa.gov.al/wp-content/uploads/2023/05/Udhezimi\\_per\\_poziten\\_dominuese.pdf](https://caa.gov.al/wp-content/uploads/2023/05/Udhezimi_per_poziten_dominuese.pdf)

<sup>2</sup> Judgment of 14 February 1978, United Brands and United Brands Continental v Commission, Case 27/76, EU:C:1978:22, paragraphs 122 and 124; judgment of 13 February 1979, Hoffmann-La Roche v Commission, Case 85/76, EU:C:1979:36, paragraph.



# Manual for Competition Compliance and Business Associations

- **Refusal to supply:** A dominant company could refuse to supply essential products or services to competitors, or sell them at unfairly high rates.
- **Tying and bundling:** This involves forcing buyers to purchase a non-core product when buying a core product.
- **Limiting production or development:** A dominant firm may limit production, supply, or technical development to gain an advantage, affecting innovation and consumer choice adversely.

## 2. What is compliance?

Compliance encompasses all actions taken by a company around three fundamental axes:

- **Prevention.** Involves all initiatives aimed at establishing clear policies and building awareness and compliance culture inside an organization to deter potential violations before they occur.
- **Detection.** The “risk zero” does not exist and violations may still occur despite prevention effort. Compliance will, therefore, also focus on detecting any wrongdoing.
- **Remediation.** Compliance must also serve to correct identified problems, refine policies, and take action to minimise harmful impact.

For many companies, compliance goes beyond respect for the law, it includes also a commitment to business ethics, integrity, and sustainability.

According to best practices, competition authority guidelines, and international standards, an effective compliance program should include several key elements. However, there is no one-size-fits-all approach; a compliance program designed for one company may not be effective if simply implemented in another. A compliance program must be tailored over time to the specific context and particular compliance risks of an organization. Therefore, the first step in creating and implementing a context specific program is to use a risk assessment.

The elements of a compliance program<sup>3</sup>:

- **Risk assessment.** A firm should identify and evaluate its compliance risks by considering their likelihood and potential

<sup>3</sup> OECD (2021), Competition Compliance Programmes, OECD Competition Committee Discussion Paper. Available at: [https://www.oecd.org/en/publications/2021/10/competition-compliance-programmes\\_2c1675af.html](https://www.oecd.org/en/publications/2021/10/competition-compliance-programmes_2c1675af.html).



# Manual for Competition Compliance and Business Associations

impact on the company's activities. Risk assessments should be reviewed regularly, especially when a company enters a new market. Companies must prioritize risks, determine appropriate treatment actions (mitigation, acceptance, avoidance, transfer) and assign responsibility to units and individuals. This approach enables the organization to allocate resources effectively, address specific vulnerabilities, and implement targeted measures.

- **Positive tone at the top.** Effective compliance programs require clear and visible support from the company's leadership—including the President, Board of Directors and Chief Executive Officer. The commitment of resources to a compliance program, such as a dedicated and empowered compliance officer in larger firms, exemplifies this commitment. When leadership shows its support, it reinforces the importance of compliance and encourages employees to adhere to established policies and practices.
- **Clear policies and controls.** The company must put in place guidelines and directives on how to conduct business processes and manage relations with stakeholders (including among clients, competitors, suppliers and distributors) to avoid violations of competition law and unethical behaviour.
- **Training and communication.** Mandatory compliance training is a critical component of any effective compliance program. Compliance training should be required for all staff in positions with identified risks, as well as part of new employee training. The training content must be adapted to reflect the company's unique risk profile. In addition to training, the company and its leadership should communicate regularly on the company's commitment towards compliance and engage in zero tolerance for any competition law violations. Compliance with competition law can sometimes be complex and companies often designate a contact person through whom staff can raise concerns or questions regarding the alignment of business decisions and practices with competition regulations.
- **Whistleblowing channel.** The company should create a whistleblowing channel where staff and other stakeholders can confidentially report suspicions of competition law infringements. Under this program, people who report potential violations must be protected from retaliation.
- **Disciplinary regime.** The organisation must establish a set of rules, procedures, and sanctions for misconduct. Disciplinary measures to address violations of compliance policies must be consistently enforced.
- **Auditing and evaluation.** A commitment to continuous improvement should be central to the compliance program. Regular monitoring is essential to ensure the program remains current, effective, and aligned with its core objectives, which should also be regularly evaluated. Program effectiveness can be assessed through surveys, training evaluations, and interviews with key personnel to gauge their knowledge and attitudes toward compliance and illegal conduct.



## 3. Why should business associations have a compliance program?

The benefits of designing and implementing a competition compliance program for business associations are as follows:

- **Building trust with its members.** As membership and attendance to trade associations events may give rise to specific competition risks, businesses are increasingly paying attention to and conducting due diligence on trade associations competition compliance measures. Businesses will, therefore, feel more prone to become members and actively participate in business associations that act with integrity and protect their members from anti-competitive conduct.
- **Building trust with public authorities.** Lobbying is one of the key activities of trade associations as it is a legitimate means to influence existing legislation or propose amendments. Showing commitment to competition laws and integrity in lobbying efforts helps build trustworthy relationships, while also allowing the business association to be seen as a reliable stakeholder.

The consequences of non-compliance with competition law can be very costly.

- **Fines** of up to 10 per cent of the annual turnover in the previous financial year for the members individually, but also for the business association, which can be separately investigated and fined by the competition authorities, **up to 10 per cent of its members' aggregate annual turnover.**





## **Examples of a trade association being fined for an anti-competitive conduct**

European Union Commission infringement decision against European Automobiles Manufacturers' Association

In April 2025, the European Commission fined 15 major car manufacturers and the European Automobiles Manufacturers' Association (ACEA) a total of around €458 million for participating in a long-lasting cartel concerning end-of-life vehicle (ELVs) recycling.

ELVs are vehicles no longer fit for use. These vehicles are dismantled and processed for recycling, recovery, and disposal.

The Commission's investigation revealed that, for over 15 years, 16 major car manufacturers and ACEA entered into anticompetitive agreements and engaged in concerted practices related to the recycling of ELVs:

they agreed not to pay car dismantlers for processing ELVs. The companies also shared commercially sensitive information on their individual agreements with car dismantlers and coordinated their behaviour towards dismantlers.

they agreed not to promote how much of an ELV can be recycled, recovered and reused, and how much recycled material is used in new cars - hiding recycling information from consumers.

The investigation found that ACEA was the facilitator of the cartel, having organised numerous meetings and contacts between car manufacturers involved in the cartel.

Source: European Commission, Decision AT.40669. <https://competition-cases.ec.europa.eu/cases/AT.40669Burimi:KomisioniEuropian,VendimiAT.40669>



# Manual for Competition Compliance and Business Associations

- **Sanctions** on individuals up to **5 million lek**.<sup>4</sup>

## **Albanian infringement decision against a bread producers' association.**

In 2007, member undertakings of the bread producers' association "Apollonia" Fier, led by Chairman Mr. K. H, entered into an agreement to fix and increase the prices of various types of bread. This conduct was found to violate Article 4, point 1(a) of Law No. 9121, dated 28.07.2003, "On the Protection of Competition".

Investigations and hearing procedures revealed that Mr. K. H was the main initiator and organizer of the price-fixing agreement, publicly confirming its existence in both print and broadcast media. As such, his actions were deemed intentional and in breach of Article 74, point 1 of the Competition Law.

The Competition Commission, based on relevant provisions of the law, imposed an individual fine of 30,000 ALL on Mr. K.H.

Source: <https://caa.gov.al/wp-content/uploads/2023/05/Vendimi-67.pdf>

- **Civil damages for anti-competitive conduct.** Any person or company affected by the anti-competitive conduct can claim damages before the competent court to members of the trade association and to the association itself.

<sup>4</sup> According to Article 78 of the Albanian Competition Law the Commission may impose fines on individuals not exceeding 5 million lek on individuals, if they, intentionally or negligently, carry out or co-operate to carry out actions sanctioned in accordance with article 73, paragraph 1 and article 74, paragraph 1.

## 4. What is ACA's policy regarding compliance programs?

The Albanian Competition Authority (ACA) views the adoption of competition compliance programs by businesses positively. Reflecting a broader trend among European Union competition authorities, the ACA issued guidelines in 2017 encouraging companies to develop robust competition compliance programs<sup>5</sup>. The 2017 guidelines offer numerous practical tips for designing and implementing effective compliance measures. The present guide complements ACA's 2017 compliance guidelines by providing further practical tips on how to tailor compliance programs to business associations most common competition risks.

The ACA does not offer immunity or fines reductions solely for adopting of compliance programs as may be the case in other jurisdictions. Instead, it believes that the reward for a well-implemented compliance program is the early detection of anti-competitive conduct and the possibility for companies to leverage the leniency program to obtain immunity or reduced fines. This approach aligns with the policy adopted by the European Commission.

<sup>5</sup> Available at: [https://caa.gov.al/wp-content/uploads/2023/05/Programi\\_i\\_prpuethshmrir\\_red.compressed.pdf](https://caa.gov.al/wp-content/uploads/2023/05/Programi_i_prpuethshmrir_red.compressed.pdf)





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## **LINIENCY PROGRAM: WHO, WHY, WHAT, HOW**



### Who can apply for leniency

- Companies operating in the market that are part of anticompetitive agreements



### Why apply for leniency

- Immunity from fine - first applicant and not a leader of the cartel
- Reduction of fines (50% to 20%)



### What is required to apply for leniency

- Application before the investigation initiated
- Commission does not have sufficient data
- Immediately make the evidence available



### How to apply for leniency

- Via the form [www.caa.gov.al](http://www.caa.gov.al)
- Email us: [competition@caa.gov.al](mailto:competition@caa.gov.al)
- Call us : +355 4 22 34 504

Source : [https://caa.gov.al/wp-content/uploads/2023/06/Fine\\_Leniency\\_Programme.pdf](https://caa.gov.al/wp-content/uploads/2023/06/Fine_Leniency_Programme.pdf)



### 5. What are the competition compliance risks that business associations face?

Business associations have a range of legitimate purposes, such as providing services, market-intelligence information and representing the interests of the industry before the public authorities.

Business associations can also become a key point of contact with competition authorities and have a central role to play in promoting competition law culture among their members.

However, due to the nature of their activities, business associations often bring together competing companies that interact with one another. This exposes them to competition compliance risks, especially regarding the provisions prohibiting anti-competitive agreements. Historically, business associations have served as forums for many cartel cases, which has led to them being viewed with suspicion not only by competition authorities but also by their current or prospective members. Consequently, companies frequently conduct due diligence before joining such associations and remain vigilant about their staff's involvement in activities organized by these associations.

In particular, business associations could inadvertently or deliberately breach competition law in several ways. The most common include:

- **Sharing sensitive information:** A business association must avoid acting as a conduit for or facilitating the exchange of non-public, strategic information among members, such as future pricing plans, customer data, production volumes, or business strategies. This includes preventing members from discussing such sensitive information at association events, whether formal or informal.
- **Facilitating anti-competitive agreements:** A business association must not have rules preventing members from making independent commercial decisions. Business associations should also refrain from making informal or formal pricing or output recommendations. Care should be taken to avoid assisting members in dividing markets or fixing prices, such as by establishing rules that restrict prices or discounts, soliciting business, or competing with each other.
- **Restricting membership:** Imposing irrelevant, arbitrary, or discriminatory membership criteria can hinder competition and should be avoided.



## Manual for Competition Compliance and Business Associations

- **Standard setting and certification:** While establishing industry standards and certification schemes can be beneficial, they may be misused to exclude competitors. Standards must be transparent, objective, and proportionate to prevent competition law infringements.
- **Collective boycotts:** This occurs if members agree not to engage with specific businesses to pressure them or exclude them from the market. For example, encouraging or facilitating collective refusals to deal with certain suppliers, customers, or competitors can violate competition law.



## 6. How can business associations mitigate competition compliance risks?

To prevent these risks and become a trustworthy, business association, should foster a compliance culture of zero tolerance toward anti-competitive conduct and establish clear rules to embed that culture within the associations and among its members. This guide offers some recommendations for mitigation actions and controls that associations could adopt. As mentioned above, there is no “one-size fits all” in compliance and each association should carefully assess its own context and governance structure and adapt these recommendations to suit its specific circumstances:

- ✓ Adopt a Code of Conduct or Competition Statement where the leadership of the business association commits to a zero-tolerance policy against anti-competitive conduct.
- ✓ Set-up a communications strategy of your zero-tolerance commitment against anti-competitive conduct. For example, by communicating it at every meeting and event, organising roundtables and working groups about the importance of respecting competition laws.
- ✓ Establish procedures and rules on the management of meetings:
  - Make sure there is an agenda prior to each meeting and circulate it to members sufficiently in advance.
  - Make sure that discussions do not depart from the points of the agenda.
  - Establish clear rules about topics that cannot be discussed during meetings and during side events (for example, working committees or social gatherings). Points that must be avoided include:
    - information on prices (actual prices, discounts, increases or reductions)
    - commercial terms and conditions
    - customer data
    - production volumes
    - production costs
    - company costs
    - sales volumes
    - turnovers
    - marketing plans
    - business/commercial strategies
    - production capacities
    - investments
    - research and development programmes
    - other commercially sensitive information
    - common initiatives against specific suppliers, customers or competitors
    - discussions on price-fixing, allocation of markets and consumers



## Manual for Competition Compliance and Business Associations

- Establish clear rules about what can be discussed during meetings and during side events (for example, working committees or social gatherings). Subjects that can be addressed include:
  - Non-confidential technical or regulatory issues relevant to the industry,
  - Information regarding industry public relations or lobbying
  - Public opinion trends on products or sector image.
  - Any other issue affecting the industry or the sector if it does not amount to alignment of competitive behaviour.
- Draft and keep minutes of the exchanges that take place during meetings.
- If possible, hire an external competition lawyer to attend meetings, moderate discussions, take minutes and intervene when necessary.
- In the event of discussions that deviate from the agenda and/or steer towards a risky topic (e.g. disclosure of commercially sensitive information or coordination of competitive behaviour) business association staff (or external lawyer, if present) should intervene to stop the conversation, ask participants to leave the meeting, document the incident in the minutes of the meeting, and adopt remediation measures (including leniency application).
- ✓ Establish procedures on how to gather and circulate business statistics:
  - Appoint a business association employee or an independent company to confidentially collect and treat data.
  - Build information barriers inside the association to protect confidential information, if necessary.
  - Make sure that the persons in charge of collecting and treating statistical data have signed and understood their confidentiality obligations and know how to behave in this regard.
  - Only disseminate statistics that are sufficiently aggregated and historic (there is a common understanding that historic data is older than 1 year).
  - Never comment or add recommendations when circulating business statistics.



# Manual for Competition Compliance and Business Associations

- ✓ With regard to lobbying activities, make sure that:
  - Besides the existence of an “official” position of the business association, members are not being prevented from making other proposals or taking another stand.
  - The position business associations may defend before public authorities should not influence its members’ independent market behaviour. .
  - The speech of the business association with public authorities does not involve public discrediting of a firm, person, product of service.
  
- ✓ With regard to standard-settings and certifications, ensure that:
  - The standard or certification development process is open to all companies (member and non-members).
  - The standard or certification development process is transparent.
  - The requirements to meet the standard or the certification must be fair, reasonable and non-discriminatory.
  - Standards and certifications are non-binding.
  
- ✓ Establish a procedure and clear criteria for becoming a member of the business association.
  - Specify the formalities for submitting a membership application.
  - Set clear and specific criteria to become a member.
  - Make those criteria accessible to all.
  - Make sure that membership criteria are based on objective and verifiable conditions justified by the nature of the industry or activity.
  - Establish deadlines for examining membership applications.
  - Always give reasons why a membership application has been refused.



# Manual for Competition Compliance and Business Associations

- ✓ Train the business association staff on do's and don'ts and on how to act in case of suspicions of an anti-competitive conduct, including the possibility to report to the competition authorities or apply for leniency.
- ✓ Conduct due diligence on existing and future members by, for example:
  - requesting them a written signed acknowledgement of their commitment against anti-competitive conduct.
  - make access to membership for new entrants dependant on promising that they will not engage in anti-competitive behaviour.
  - checking the existence of an internal compliance program addressing competition matters.

## 7. What is the role of business associations in incentivising the adoption of competition compliance programs among business?

Moreover, business associations can play an important role in advocating for competition compliance programs in the industry, incentivising members to adopt such programs.

Companies are more likely to act ethically and compete fairly when they are assured that their competitors also uphold the same high standards and comply with competition rules.

Business associations can serve as valuable platforms, bringing together companies within a sector to collaborate in the fight against anti-competitive conduct and help create a level playing field for all market participants.

Business associations may support good corporate governance and the adoption of competition compliance programs in a variety of ways, including by:

- Requiring members to commit to do business without resorting to anti-competitive conduct.
- Increasing awareness about the detrimental effects of anti-competitive practices through seminars, conferences, and studies, among others.
- Compiling information on best practices and expected standards related to compliance and competition policies.
- Providing training on competition-related issues as well as ethics and integrity to members.



## 8. Consumer Protection and Competition Compliance

Competition law and consumer protection reinforce one another. In markets, where there is effective competition, producers have incentives to align with consumer protection objectives, for example, to attract customers away from rivals they are likely to provide the necessary information to reduce switching costs. At the same time, when consumers are able to exercise their choices effectively, they can act as a competitive discipline upon producers. In some jurisdictions, like Spain, competition laws include consumer protection aspects, and it is not uncommon for companies to include consumer protection as part of their competition compliance programs.

Compliance should not operate in silos. Many of the initiatives, actions, and procedures outlined above can be leveraged to address consumer protection concerns. For example, in the context of standard-setting procedures, business associations could implement a rule inviting not only firms but also consumer associations to participate in the development process, fostering transparency and inclusiveness.

Training programs can be designed to cover both compliance and consumer protection topics, ensuring a cohesive understanding across teams. Conversely, when discussing product advertising from a consumer protection perspective, members should be mindful of rules related to sensitive commercial topics, such as marketing strategies, that may require confidentiality and not be suitable for discussion in meetings. Business associations could also adopt advocacy initiatives to jointly promote competition and consumer protection compliance programs.



