

Preventing Anti-Competitive Practices Storyboard

Legend for Colour Codes Used in this Storyboard:

Text Colour	Role	Character Name	Gender	Style
Dark Red	Neutral Narrator 1	N/A	Male/Female	
Purple	Neutral Narrator 2	Carla	Female	
Orange	Neutral Narrator 3	Competitor	Male	
Khaki	Neutral Narrator 6	Frank	Male	
Light Blue	Neutral Narrator 4	Colleague	Female	
Navy Blue	Neutral Narrator 8	Tough customer	Female	
Dark Green	On-Screen Text	---	---	On Screen Text
Dark Blue	Instruction Text	---	---	Instruction Text
Black	Internal Notes to the Development Team	---	---	Development Notes

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Queries

Sr. No.	Query	Response
1.		

Notes for Development Team

1. Please include resources tab with the following:

Our Code of Conduct

<https://www.ccamatil.com/-/media/Cca/Corporate/Files/Policies/1806-Code-of-Conduct.ashx?la=en>

Whistleblower Protection Policy

https://www.ccamatil.com/-/media/Cca/Corporate/Files/Policies/191211_GroupWhistleblowerProtectionPolicy.ashx?la=en

Our Purpose and Values

<https://www.ccamatil.com/en/our-company/our-purpose-and-values>

Main Menu and Navigation

Page Title	Main Menu	Type	Static text and image	Number	1.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.	--	PREVENTING ANTI-COMPETITIVE PRACTICES		Menu page linking to each section. Adjust text regarding menu, resources etc. based on where on the screen they are located.	

		<p>Welcome to the course!</p> <p>You are required to complete each chapter and a then short quiz.</p> <p>You can access the Menu, Resources, and References using the icons at the top right of the screen.</p> <ul style="list-style-type: none"> How to navigate this course Introduction Competition Law principles Interacting with competitors Interacting with customers Reporting issues Conclusion Knowledge check 	<p>Bulleted points are the sections.</p> <ul style="list-style-type: none"> How to navigate this course – link to Navigation (2) Introduction – link to Why do this course? (3) Competition Law principles – link to Competition Laws (4) Interacting with competitors – link to Interacting with competitors (5) Interacting with customers – link to Interacting with customers (9) Reporting issues – link to Reporting Issues (14) Conclusion – link to Conclusion (15) Knowledge check – link to Knowledge check (16)
End-of-Page Instruction		--	

Page Title	Navigation	Type	Static text and image	Number	2.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.	--			Example page with instructions on how to navigate the course.	

End-of-Page Instruction

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Introduction

Page Title	Why do this course?	Type	Static text and image	Number	3.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.	--	<p>Why do this course?</p> <p>Every company, in every market, can benefit from operating in an environment that is fair and that encourages healthy competition.</p> <p>Companies involved in anti-competitive activity face severe consequences including:</p> <ul style="list-style-type: none"> • Substantial fines and compensation claims from those affected by the activity • Unenforceable contracts • Reputational damage <p>Individuals engaged in anti-competitive activity also face severe personal consequences such as:</p>		<p>Link yellow highlighted text to https://www.ccamatil.com/en/our-company/our-purpose-and-values</p> <p>Link blue highlighted text to https://www.ccamatil.com/-/media/Cca/Corporate/Files/Policies/1806-Code-of-Conduct.ashx?la=en</p>	

		<ul style="list-style-type: none"> Fines Damaged career prospects Dismissal <p>Engaging in unfair conduct is not consistent with Amatil's Values or Code of Conduct.</p> <p>Being straightforward and open increases trust and honesty among all our stakeholders and holds us to higher standards. We need to be honest and transparent in all our actions and behaviours.</p> <p>Learn more about how you can help prevent anti-competitive practices at Amatil by working through this course.</p>	
End-of-Page Instruction	--		

Competition Law principles

Page Title	Competition Laws	Type	Static text and image	Number	4.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.	--	Countries across the world have introduced laws that protect companies and consumers from unfair competitive practices.		Breakout box for highlighted text.	

		<p>These laws are generally referred to as competition laws or anti-trust laws and are underpinned by three key principles:</p> <ul style="list-style-type: none"> • Promoting consumer choice • Encouraging fair business dealings • Rewarding innovation and continuous improvement <p>They are not intended to punish success, discourage growth or introduce trade barriers. They aim to ensure that companies like Amatil are successful for the right reasons.</p> <p>Competition laws are complex and vary amongst Amatil territories. Always speak to your local Legal team if you have any questions regarding competition laws.</p>	
End-of-Page Instruction	--		

Interacting with competitors

Page Title	Interacting with competitors	Type	Video	Number	5.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.		<p>Competition law issues can arise in situations where you meet or interact with competitors. To deal with these issues, it's important to be</p>		<p>Video with closed captions – please use images that match the narration.</p>	

		<p>aware of the risks and the steps you need to take to manage them.</p> <p>Watch the following videos and then answer the questions that follow to learn more about how you should interact with our competitors.</p> <p>Click the screen or press [play button] to play the video.</p>	Replace [play button] with an image of the play button.
2.	<p>Carla is an Amatil Business Development Executive (BDE).</p> <p>She meets a delegate who works for another beverage company at a Fast-Moving Consumer Goods (FMCG) conference and they begin discussing business during the coffee break.</p> <p>So how are things going with you guys?</p> <p>We've been under a lot of pressure to bring down our prices. Everyone seems to want a better deal.</p>		Video with closed captions – please use images that match the narration.
3.	<p>I know what you mean. Are you planning to revisit your pricing?</p>		Video with closed captions – please use images that match the narration.

	<p>It depends. If everyone else is dropping prices, I guess we'll need to do the same. What about you?</p> <p>We're standing firm. Our prices won't change for the next six months.</p> <p>Really? Then I guess we'll do the same thing.</p>		
End-of-Page Instruction	--		

Page Title	Horizontal agreements	Type	Knowledge check	Number	6.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.		<p>Which of the following do you think could be negatively impacted by Carla's discussion with the competitor?</p> <p>Select all answers that apply, then click "Submit"</p> <ul style="list-style-type: none"> Promoting consumer choice Encouraging fair business dealings 		<p>Ungraded quiz (knowledge check). Correct answers are bolded.</p> <p>Please show visual indicators for correct/incorrect selection and answer.</p>	

		<ul style="list-style-type: none"> • Rewarding innovation 	
2.		<p>Carla's actions could have a potentially negative impact on all these factors.</p> <p>Competition laws prevent anti-competitive agreements between competitors.</p> <p>Promoting consumer choice Carla's discussion with the competitor could be seen as an agreement to fix prices. This could restrict consumers' freedom to choose between different products offered for sale at different prices.</p> <p>Encouraging fair business dealings Carla has shared information about Amatil's pricing strategy with a competitor. This information is not available to other players in the market, who are unfairly disadvantaged by this exchange of information.</p> <p>Rewarding innovation Responding to challenging market conditions can drive change and improvement in a company's products, services and processes. Using anti-competitive means to deal with</p>	<p>Doesn't matter if the learner gets it correct, the learning is in the feedback.</p> <p>Same feedback for correct and incorrect (except for stating whether they were correct or not).</p>

		these challenges has a potentially negative effect on innovation in the market.	
End-of-Page Instruction	--		

Page Title	Bidding for contracts	Type	Video	Number	7.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.	During the lunch break Carla runs into Frank, an ex-colleague who now works for a rival company.	Carla runs into an ex-colleague. Click the screen or press [play button] to play the video.		Video with closed captions – please use images that match the narration. Replace [play button] with an image of the play button.	
2.	So how are things going with the new company? Not bad. I suppose you don't need me to tell you that things are pretty tough for the FMCG industry right now.			Video with closed captions – please use images that match the narration.	
3.	True. Amatil is facing challenges too, but we have some interesting opportunities in the pipeline. I suppose you're talking about the contract with CFK?			Video with closed captions – please use images that match the narration.	

	<p>You know I can't tell you that... after all, we're competitors now.</p> <p>Of course. But let's assume that you are bidding. I might be able to help you. We won't bid for the CFK deal if you agree not to bid for the contract with Pizza Papas. How does that sound?</p>		
End-of-Page Instruction	--		

Page Title	Bidding for contracts	Type	Knowledge check	Number	8.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
3.		<p>After her conversation with Frank, Carla felt a bit uneasy. She knew there were things they shouldn't have discussed as they could have risked breaching competition law.</p> <p>Which aspects of the conversation do you think may have risked breaching competition laws?</p> <p>Select all answers that apply, then click "Submit"</p>		<p>Ungraded quiz (knowledge check). Correct answers are bolded.</p> <p>Please show visual indicators for correct/incorrect selection and answer.</p>	

		<ul style="list-style-type: none"> • Their discussions about the challenging state of their industry • Frank's hint that he knows that Amatil is bidding for the CFK contract • Frank's suggestion to agree on which contracts each of their companies should bid for 	
4.		<p>It is perfectly acceptable to discuss general matters with a competitor, such as the economic conditions in your industry.</p> <p>Carla and Frank risked breaching competition laws by:</p> <ul style="list-style-type: none"> • Sharing commercially sensitive information – this could be considered evidence of an illegal agreement. • Discussing a bid rigging arrangement – competition laws prohibit competitors from co-operating with each other in an attempt to influence the outcome of a competitive bidding process. 	<p>Doesn't matter if the learner gets it correct, the learning is in the feedback.</p> <p>Same feedback for correct and incorrect (except for stating whether they were correct or not).</p>
End-of-Page Instruction		--	

Interacting with customers

Page Title	Interacting with customers	Type	Video	Number	9.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.		<p>While we need to be mindful when interacting with competitors, we also need to be careful with how we interact with our customers.</p> <p>Watch these videos and then answer the questions that follow to learn more.</p> <p>Click the screen or press [play button] to play the video.</p>		<p>Video with closed captions – please use images that match the narration.</p> <p>Replace [play button] with an image of the play button.</p>	
2.	<p>Carla is working on her sales targets for the year, when her colleague comes to her desk to ask her advice on how to deal with a customer's latest marketing campaign.</p> <p>Carla, I thought you might want to see this. It's Convenience Corner's latest special offer.</p> <p>What? That's way below our recommended retail price!</p>			<p>Video with closed captions – please use images that match the narration.</p>	

	I know. I'm worried that it might hit revenues and de-value our brand.		
3.	<p>We can't let this offer continue.</p> <p>We're meeting with Convenience Corner tomorrow, what shall we say to them?</p> <p>I'm not sure...</p>		Video with closed captions – please use images that match the narration.
End-of-Page Instruction		--	

Page Title	Vertical agreements	Type	Knowledge check	Number	10.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.		<p>What advice would you give to Carla?</p> <p>Select one answer, then click "Submit"</p> <ul style="list-style-type: none"> Do whatever it takes to make Convenience Corner increase their price. Don't leave the meeting without an agreement. Promise Convenience Corner an unheard-of discount on their next batch of stock if they promise to withdraw the special offer. 		<p>Ungraded quiz (knowledge check). Correct answer is bolded.</p> <p>Please show visual indicators for correct/incorrect selection and answer.</p>	

		<ul style="list-style-type: none"> Don't fight them, just discuss what marketing support Amatil could provide to help increase sales and maintain revenues. 	
2.		<p>Carla should not use uncommercial incentives or undue pressure to influence the customer's pricing decisions — they should be free to set their own prices in a way that benefits their business.</p> <p>Competition laws prevent anti-competitive practices and behaviour between a company and its customers, distributors or supply chain partners.</p>	<p>Doesn't matter if the learner gets it correct, the learning is in the feedback.</p> <p>Same feedback for correct and incorrect (except for stating whether they were correct or not).</p>
End-of-Page Instruction		--	

Page Title	Information from customers	Type	Video	Number	11.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.		<p>When interacting with customers, suppliers and other third parties who also deal with our competitors, there is the possibility that we may encounter competitor information.</p> <p>Watch these videos and then answer the questions that follow to learn more.</p>		<p>Video with closed captions – please use images that match the narration.</p> <p>Replace [play button] with an image of the play button.</p>	

		Click the screen or press [play button] to play the video.	
2.	<p>Carla is negotiating a deal with a new customer. This customer drives a hard bargain and is trying to push Amatil to reduce its prices.</p> <p>Carla, I'll be honest with you. We purchase similar products from our other suppliers for much lower prices.</p> <p>I can show you the details of the deal we struck with your closest competitor if you'd like.</p> <p>I'm sure you'll see that your prices are way too high in comparison.</p>		Video with closed captions – please use images that match the narration.
End-of-Page Instruction		--	

Page Title	Should we discuss competitor pricing?	Type	Knowledge check	Number	12.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	

1.		<p>Cala is keen to strike a deal with the customer; how do you think she should respond?</p> <p>Select one answer, then click “Submit”</p> <ul style="list-style-type: none"> • Refuse to discuss the prices offered by competitors and focus the discussion on the unique selling points and value proposition of Amatil’s products. • Avoid a discussion about the competitor's specific prices but ask the customer to indicate the price that she would expect to pay for similar products. • Agree to look through the details of the prices the customer has negotiated with a competitor. 	<p>Ungraded quiz (knowledge check). Correct answer is bolded.</p> <p>Please show visual indicators for correct/incorrect selection and answer.</p>
2.		<p>Carla should refuse to discuss a competitor's pricing strategy and should instead explain what makes Amatil’s portfolio unique and better than the alternatives.</p> <p>Regardless of the source, exchanges of information about prices, costs and margins could constitute a breach of competition laws.</p>	<p>Doesn’t matter if the learner gets it correct, the learning is in the feedback.</p> <p>Same feedback for correct and incorrect (except for stating whether they were correct or not).</p>
End-of-Page Instruction		--	

Page Title	Focus on features and benefits	Type	Text and static image	Number	13.
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Screen Layout			
Event	Audio	On-Screen Text (OST)	Internal Development Notes
1.		<p>Amatil approaches its negotiations with confidence in the quality of our offering.</p> <p>Focusing on the features and benefits of our own products, prices and terms, rather than on those offered by our competitors, ensures that we comply with competition laws and win business the right way.</p>	
End-of-Page Instruction		--	

Reporting issues

Page Title	Reporting issues	Type	Click to reveal	Number	14.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.	--	<p>It is your responsibility to report competition law issues</p> <p>In any company, the actions of just one individual can compromise the entire company's reputation. In many cases, one person's vigilance, commitment and action could help to identify and resolve competition law issues before they escalate.</p>		<p>Click to reveal more information below headings in events 2-5. Headings are bolded.</p>	

		Click on each question to find out about more your responsibility to report competition law issues.	
2.		<p>What should you report?</p> <p>If you know or suspect that competition law has been breached, you should always report it. This applies to known or suspected breaches by competitors, suppliers or colleagues and to any concerns you may have about your own conduct.</p>	
3.		<p>Why should you report it?</p> <p>Building an environment in which companies compete on the merits of the products or services they offer brings benefits to companies, employees and consumers.</p>	
4.		<p>When should you report it?</p> <p>In some countries, the first person to make a report to the competition authorities may be treated more leniently.</p> <p>For this reason, it's important that you report any concerns immediately.</p>	
5.		<p>How should you report it?</p> <p>Report any issues to your local Legal team. Our Whistleblower Protection Policy provides further guidance.</p>	Link highlighted text to https://www.ccamatil.com/-/media/Cca/Corporate/Files/Policies/191211_GroupWhistleblowerProtectionPolicy.ashx?la=en
End-of-Page Instruction		--	

Conclusion

Page Title	Our commitment, your responsibility	Type	Static text and image	Number	15.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.	--	<p>Amatil is committed to complying with Competition Law</p> <p>Every company, in every market, can benefit from operating in an environment that is fair and that encourages healthy competition.</p> <p>We are committed to:</p> <ul style="list-style-type: none"> • Encouraging fair competition in the markets in which we operate • Competing on the quality of the products and services we offer • Protecting our reputation for honesty, integrity and transparency <p>Amatil's commitments can only be effective if everyone at Amatil is aware that they exist and is committed to following them. For this reason, it's important that every Amatil employee is familiar with the standards of behaviour we expect.</p>			

		If you have any doubts or questions about any aspect of competition law compliance, always err on the side of caution and ask before you act.	
End-of-Page Instruction	--		

Knowledge check

Page Title	Assessment	Type	Static text and image	Number	16.
Screen Layout					
Event	Audio	On-Screen Text (OST)	Internal Development Notes		
1.		<p>Check your Knowledge</p> <p>You will be presented with 5 questions to check that you understand how you can help prevent anti-competitive practices at Amatil.</p> <p>To receive credit for this course you must get all 5 questions right.</p> <p>Click the 'Next' arrow to begin.</p>			
End-of-Page Instruction		--			

Page Title	Assessment	Type	Textual MRQ (Single-Select)	Number	17.
Question Stem	What are the key principles that form the basis of most competition laws?				
Instruction	Select the correct option and click Submit .				
Options	<input type="checkbox"/> Promoting consumer choice, encouraging fair business dealings and rewarding innovation <input type="checkbox"/> Introducing trade barriers and protecting intellectual property rights <input type="checkbox"/> Rewarding success and protecting established companies from new market entrants <input type="checkbox"/> Giving companies new to a particular market an advantage over those with an established market position				
Visual Feedback	Please show visual indicators for correct/incorrect selection and answer. The correct answer is boldfaced.				
Correct Feedback	<p>You are right!</p> <p>Competition laws are not intended to punish success, discourage growth or introduce trade barriers. The key principles of competition laws are promoting consumer choice, encouraging fair business dealings and rewarding innovation.</p>				
Incorrect Feedback	<p>That's not quite right.</p> <p>The key principles of competition laws are promoting consumer choice, encouraging fair business dealings, and rewarding innovation. Competition laws are not intended to punish success, discourage growth or introduce trade barriers.</p>				
End-of-Page Instruction					

Page Title	Assessment	Type	Textual MRQ (Single-Select)	Number	18.
Question Stem	What type of arrangements between competitors can be evidence of an anti-competitive agreement?				
Instruction	Select the correct option and click Submit .				
Options	<input type="checkbox"/> Any agreement which contains an explicit term which fixes prices <input type="checkbox"/> Only written agreements that impose restrictive terms <input type="checkbox"/> Any form of agreement or understanding that can limit competition <input type="checkbox"/> Only agreements and understandings that explicitly limit production				

Visual Feedback	Please show visual indicators for correct/incorrect selection and answer. The correct answer is boldfaced.
Correct Feedback	<p>You are right!</p> <p>All agreements or understandings between competitors that explicitly or implicitly seek to limit competition can be evidence of an anti-competitive agreement.</p>
Incorrect Feedback	<p>That's not quite right.</p> <p>All agreements or understandings between competitors that explicitly or implicitly seek to limit competition can be evidence of an anti-competitive agreement.</p>
End-of-Page Instruction	

Page Title	Assessment	Type	Textual MRQ (Multi-Select)	Number	19.
Question Stem	How should you respond to any competition law concerns that may arise at Amatil?				
Instruction	Select ALL answers that apply and click Submit .				
Options	<p><input type="checkbox"/> You should report any breach of competition law, whether by Amatil, by a competitor or by a supplier, to the Legal team</p> <p><input type="checkbox"/> You should report any concerns promptly, as the authorities tend to treat companies who expose breaches first more leniently than those who do not</p> <p><input type="checkbox"/> You, as an individual, do not need to do anything; it's up to your Legal team to report such issues</p> <p><input type="checkbox"/> You should make sure you are familiar with applicable competition laws and ask for advice from your local Legal team if you are unclear on what is permissible</p>				
Visual Feedback	Please show visual indicators for correct/incorrect selection and answer. The correct answer is boldfaced.				
Correct Feedback	<p>You are right!</p> <p>Compliance with competition laws is a shared responsibility for everyone at Amatil. Make sure you can recognise potential breaches and know how to report them.</p>				

Incorrect Feedback	That's not quite right. Compliance with competition laws is a shared responsibility for everyone at Amatil. Make sure you can recognise potential breaches and know how to report them.
End-of-Page Instruction	

Page Title	Assessment	Type	Textual MRQ (Single-Select)	Number	20.
Question Stem	Mark is at an industry conference, where he meets with a representative from his company's main competitor. Which of these topics can Mark safely discuss with the competitor?				
Instruction	Select the best option and click Submit .				
Options	<input type="checkbox"/> General market conditions that affect the industry <input type="checkbox"/> Planned changes in the prices his company charges <input type="checkbox"/> A recent increase in costs due to the introduction of a new tax regime and how it may affect pricing <input type="checkbox"/> His company's plans to bid for a lucrative contract				
Visual Feedback	Please show visual indicators for correct/incorrect selection and answer. The correct answer is boldfaced.				
Correct Feedback	You are right! When interacting with competitors, it is acceptable to discuss general matters, but certain exchanges of information could be seen as an attempt to enter into an anticompetitive agreement. For this reason, avoid discussing bids, prices, costs, or other commercially sensitive matters with a competitor.				
Incorrect Feedback	That's not quite right. When interacting with competitors, it is acceptable to discuss general matters, but certain exchanges of information could be seen as an attempt to enter into an anticompetitive agreement. For this reason, avoid discussing bids, prices, costs, or other commercially sensitive matters with a competitor.				
End-of-Page Instruction					

Page Title	Assessment	Type	Textual MRQ (Single-Select)	Number	21.
Question Stem	Frederick, a sales person, recently visited one of his customers who complained that Amatil's pricing was too high. Today, he has unexpectedly received an email from that customer titled 'Here's a price list to prove my point'. Which of the following is correct?				
Instruction	Select the best option and click Submit .				
Options	<input type="checkbox"/> Frederick should forward the email to his Sales Manager for advice. <input type="checkbox"/> Since Frederick didn't ask for this information, he is free to read it. <input type="checkbox"/> Frederick should just delete the email and forget he ever received it. <input type="checkbox"/> Frederick should call the Legal team for advice before taking further action.				
Visual Feedback	Please show visual indicators for correct/incorrect selection and answer. The correct answer is boldfaced.				
Correct Feedback	<p>You are right!</p> <p>Dealing with unsolicited information the wrong way may cause competition law issues – the Legal team are here to guide you through these situations.</p>				
Incorrect Feedback	<p>That's not quite right.</p> <p>Even though the information Frederick received was unsolicited, it is important that he deal with it the right way in order to avoid competition law issues – the Legal team are here to guide you through these situations.</p>				
End-of-Page Instruction					

Page Title	Conclusion	Type	Static text and images	Number	22.
Screen Layout					
Event	Audio	On-Screen Text (OST)		Internal Development Notes	
1.		You have now completed this module.		Include 'Exit Course' button	

		Please close this window or click on the 'Exit Course' button to close this page and record your completion.	
End-of-Page Instruction	--		