



Competition Law script

Created by
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Delivered to
CLIENTS

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Guideline word counts: 30 mins approx 6,000, 60 mins approx 12,000	

Version	Date	Comments
0.1	April 17, 2023	Draft Script
0.2	02/05/2023	QA
0.3	May 3, 2023	QA Amended Script
0.4	May 11, 2023	Client Amended Script (v2 for approval)

Pre-Menu Page 1

Template	Step by step
Page title	How this works!
Slide number	1_1
Dev notes	

Overall title	How this works!
Instruction text	Select the forward arrow to continue.

Step 1	
Title	Main Menu
Text	This button will return you to the main menu where you can navigate to course topics.
Graphic	Main Menu button

Step 2	
Title	Badges
Text	Click on this button and you will see the badges you have earned so far. Collect all four to complete the course!
Graphic	Badges button

Step 3	
Title	Health Meter
Text	Work your way up to the green and check in at any time.
Graphic	Health meter button

Step 4	
Title	Forward and Backward arrows
Text	Use these arrows to move on in the course, or to review previous content.
Graphic	Forward and backward arrows

Step 5	
Title	Voiceover
Text	Click this button to turn off the voiceover of the course content. You can turn the voiceover back on at any time. OR Click this button to turn on the voiceover of the course content. You can turn the voiceover off at any time.
Graphic	Forward and backward arrows

Pre-Menu Page 2

Template	Show and tell
Page title	Incoming project
Slide number	1_2
Dev notes	The screen should appear as an email on a laptop screen

Title	Incoming project
Text	Dear Olivia, There is a big project coming up and I know you are the perfect person to lead it. However, there's a lot of risk involving competition law. You will have to prove that you know how to navigate the regulations. I'm sending you on a trip to learn more and to prove you are ready. You will encounter a few challenges along the way, but you will earn a badge each time you solve one of them. Earn all four badges and pass a final quiz then you will be leading that next big project! Pack your bags. You leave tomorrow! Best, Geraldine
Graphic	Image of Olivia reading her email on a laptop; the text above is the email to appear on screen
Instruction text	Select the forward arrow to continue.

Menu

Template	Menu
Page title	Competition Law
Slide number	1_3
Dev notes	Learners must complete the course in the order outlined on the main menu; learners cannot skip around.

Title	Competition Law
Instruction text	Select the available topic to begin.

Topic 1 title	Introduction
Category 1 title	Dealing with competitors
Topic 2 title	Price fixing
Topic 3 title	Other competitor issues
Category 2 title	Dealing with customers or consumers
Topic 4 title	Resale price maintenance
Topic 5 title	Other issues

Topic 1-Introduction

Template	Full screen animation
Page title	
Slide number	2_1
Dev notes	After animation, go directly into the next screen

Voice Over	Visuals	Visuals Suggestions/Ideas
Attention all passengers. Competition laws ensure that businesses compete freely and fairly so consumers are guaranteed the best prices and highest quality products.	Olivia, carrying a “designer handbag” and pulling a carry-on suitcase, is walking through a busy airport and goes by a boarding gate where there is luggage piled up on a cart	
Competition laws prohibit cartels and other agreements that restrict competition.	Olivia is still walking and can see out of an airport window where there are a few planes and some equipment outside (luggage loaders, fuel trucks, etc)	
If companies do not comply with these laws, there can be severe sanctions that include:	Olivia walks by the food court/some restaurants (Transition to show the penalties images listed below versus the airport:	
significant financial penalties, being sued for damages in multiple countries,	Stacks of money followed by bigger or multiple stacks of money	
criminal fines, imprisonment, or director disqualifications,	Prison bars	

unenforceable agreements, and	A piece of paper that says “agreement” on it being torn	
reputational damage	A newspaper with a headline in bold letters that reads “Large Cosmetic Company Under Fire for Scandal”	
This training will introduce you to rules that apply when you are dealing with competitors—	Transition back to Olivia in the airport where she is walking and gets closer to a duty free store in the distance	
including the rules relating to price fixing, sharing of markets and customers, and attending trade association meetings.	Olivia enters the duty free store and wanders past other items such as clothing, handbags/luggage,	
We will also look at the rules applicable to dealing with customers	Olivia wanders past alcohol bottles and ends up in the cosmetics and fragrances section	
—such as retailers and distributors—and consumers.	Zooms in to products (cosmetics and fragrances) on the shelves—highlights XYZ’s Luxe brands (We may see Olivia’s hand reaching for some items—checking them out/looking them over)	 L'ORÉAL C.O.S.M. LANCÔME YVES SAINT LAURENT SHU UEMURA RALPH LAUREN VALENTINO DIESEL Maison Margiela KARL LAGERFELD BIOTHERM MUGLER cacharel YVES SAINT LAURENT PRADA GIORGIO ARMANI HR VICTOR ROLOFF AZ ZARRO Archer Cologne YOUTH IS PEOPLE
Finally, we will end with a quiz to test your knowledge to be sure you have understood the rules.	Olivia continues on—the products she sees change to bottles of hair care (shampoo, conditioner, hair spray, etc)	
Your flight is now boarding!	Olivia walks back into the	

	terminal towards her gate (we see her walking away from the learner's point of view)	
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Template	Step by step
Page title	Basic concepts to know
Slide number	2_2
Dev notes	Return to Menu button appears after Step 5

Overall title	Basic concepts to know
Instruction text	Select the forward arrow to continue.

Step 1	
Title	Why?
Text	There are common terms used throughout competition laws that are essential to understand. Knowing these will support your ability to follow the rules and regulations that are in place.
Graphic	 something like this—demonstrating learning new things

Step 2	
Title	Other companies
Text	Sometimes, a company may be defined as both a customer and a competitor. <i>This might be the case for example, when XYZ operates DtoC websites or brick and mortar stores which compete with those of the retailers or when a retailer develops and sells a private label product and sells it alongside XYZ products.</i>
Graphic	

Step 3	
Title	Cartels
Text	Cartels are agreements made between competitors that impact competition, notably prices, share markets or customers, or restrict capacity or production. Cartels are the most serious violations of competition laws.

	Like stealing from consumers, there is no excuse when companies collude on prices, markets or production.
Graphic	handshake

Step 4	
Title	All types of agreements are concerned
Text	Competition laws catch not only formal agreements, but also: • oral agreements • gentlemen's agreements • other informal, non-binding conspiracies and understandings • even just a “nod and a wink”.
Graphic	Winking face/eye

Step 5	
Title	Our duty
Text	As a major player in the cosmetics industry, XYZ's duty is to respect competition law for the benefit of the consumers. We must always follow set regulations and consult the Legal department with questions.
Graphic	 Something like this—showing they need to follow the rules

Topic 2-Price Fixing (Dealing with Competitors)

POP UP when learner clicks Topic 2 from the main menu	
Title	Time for take off
Text	Now you know the basics for understanding cartels and anticompetitive agreements and the basis for the rest of the learning. Next up are details about what is prohibited when dealing with XYZ's competitors. Destination: A layover stop on the way to the big city.
Instruction text	Select the X to continue.
Graphic	image of airplane; showing some motion like it is taking off
Dev notes	This should pop up when the learner clicks on Topic 2 from the main menu.

Template	Show and tell
Page title	Drinks?
Slide number	3_1
Dev notes	

Title	Drinks?
Text	Olivia texts Leo, her friend from college. Leo works for a cosmetics industry competitor and lives in town. Olivia: Hey, Leo. I have a layover for a few hours before a flight later tonight. Want to meet up later for a drink and catch up? Leo: Hi! Yeah, a drink sounds great. Olivia: Great, 5 pm at The Rose Pub on Central Avenue? Leo: See you there!
Graphic	Olivia on her phone, standing and waiting for her suitcase at the baggage claim: The text conversation is shown between Olivia and Leo
Instruction text	Select the forward arrow to continue.

Template	Show and tell
Page title	A new city
Slide number	3_2
Dev notes	

Title	A new city
Text	Olivia has some time before meeting up with Leo and she wants to research competition law to show Geraldine she's worthy of the big project. "Look at this great town. Looks like it is time to explore the city! I have lots of questions, let's see what I can learn."
Graphic	Olivia sees the image of a cityscape, which she encounters on the next screen, in the distance (out of the window of the airport?)
Instruction text	Select the forward arrow to continue.

Template	Image map
Page title	Price fixing and colluding
Slide number	3_3
Dev notes	Client wants learner to click content presented in order and to be seen before being able to move on (available content will be highlighted in some way) At the end of the slide, there will be an additional popup with a “Practical Tip” before advancing to the next slide

Title	Price fixing and colluding
Intro text	Price fixing is the most well-known example of anticompetitive cartel behavior. If competitors collude rather than compete, customers pay higher prices. Price fixing is a broad concept that catches a range of behaviors falling well short of simply fixing final sales prices.
Main graphic	Image of a cityscape with billboards, signs, etc clickable for the hotspots (see notes about colors, etc from Diane’s email 21 April/28 April) An elaborate downtown setting, one or two bright colors and integrated billboards (eg in center of Times Square, NYC) Triggers: billboards, signs, total of 5 Images on billboards can be icons listed for each popup: Popup 1: price tag Popup 2: price tag with an up arrow Popup 3: question mark Popup 4: handshake Popup 5: dollar sign
Instruction text	

Popup 1	
Icon	Price tag
Title	Can I discuss list or target prices?
Text	No. Even when actual negotiated prices are significantly lower, if competitors discuss their initial list prices, they are price fixing. Target prices influence how companies negotiate and how aggressive they think their competitors will be. You cannot collude over discounts, either.
Graphic	Poster 1

Popup 2	
Icon	Price tag with up arrow
Title	Can I talk about a price increase in the future?
Text	No. This is price fixing, even if each company's current prices are different. Agreeing to change prices, or the timing of price changes, prevents one competitor from offering a more attractive price. Beware, giving and/or receiving information about pricing may be unlawful.
Graphic	Poster 2

Popup 3	
Icon	Question mark
Title	What about discussing just one part of pricing?
Text	Colluding over a single component of pricing may be illegal (e.g. competitors adopt a surcharge to cover the cost of new regulations). Each competitor must decide on their own how to deal with changes in costs.
Graphic	Poster 3

Popup 4	
Icon	handshake
Title	Surely we can agree on trade terms?
Text	No. You and a competitor cannot agree on payment terms such as: • payment methods • credit • security • financial disclosure requirements • withdrawal of promotional offers.
Graphic	Poster 4

Popup 5	
Icon	Dollar sign
Title	Can we agree on purchase prices for raw materials?
Text	This can get tricky. Agreeing on purchase prices for raw materials or inputs can amount to an illegal cartel. However, joint purchasing can be a legitimate activity that lowers prices. This is a fine line and you should consult your Legal department for guidance.
Graphic	Poster 5

Final POP UP before advancing to the next page (no icon on image map)	
Title	Practical tip
Text	Sometimes, you may need to buy products from or sell products to a competitor. How can you do that without an unlawful exchange of information? Here are a few practical tips: • Make sure it's a legitimate potential deal—not an excuse to be in contact with a competitor. • Limit your discussion to the specific deal—how much will you pay or charge for this particular quantity of product you are trading with the competitor now? • Do not discuss prices, market conditions, trends, or any other sensitive matters beyond the specific deal in hand.
Instruction text	Select the X to continue.
Graphic	Image of light bulb
Dev Notes	This pops up before progressing to the next screen.

Template	Step by step
Page title	Competitive pricing
Slide number	3_4
Dev notes	

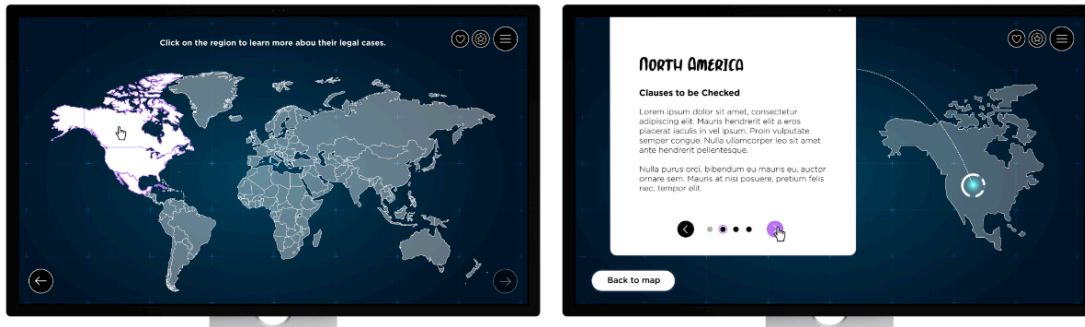
Overall title	Competitive pricing
Instruction text	Select the forward arrow to continue.

Step 1	
Title	Monitoring information
Text	So, what can we do to ensure our prices are competitive if we cannot contact competitors? The best way is to monitor information in the trade press, on websites and all other public sources.
Graphic	Collage of newspapers, computers, magazines

Step 2	
Title	Price lists
Text	A customer may give you information such as price lists or quotes from competitors in order to get better prices. While not unlawful, you must never contact the competitor to verify. Also, you should not ask your customer to share your price list with a competitor.
Graphic	Stack of papers, top paper has list of dollar amounts

Step 3	
Title	Practical tip
Text	If an investigator thinks the information in your file came from a competitor, they might ask you where you got it from, so be sure to record the date and source. If you're not sure about the sharing of information, reach out to the Legal department.
Graphic	Light bulb icon

Template	Image map with Step by Step
Page title	3_5
Slide number	Price fixing cases
Dev notes	see image below-we combined an image map with a step by step (the learner click on their applicable region then reads through several examples for that region)



Title	Price fixing cases
Intro text	Price fixing is illegal and the consequences are real.
Main graphic	World map
Instruction text	Click on the region where you conduct business and use the arrows to read through real cases. Then, return to the map and select the forward arrow to continue.

Popup 1	
Title	Zone Europe
Graphic	outline of the EU (as laid out in the design spec images)

Popup 1 Step 1	
Title	Zone Europe Switzerland
Text	October 2011: The Swiss Competition Commission prohibited several undertakings active in the luxury cosmetics sector (including XYZ) from exchanging information on prices, turnovers, advertising expenses and sales terms stating they allowed the participants to adjust their market behavior to one another.

Popup 1 Step 2	
Title	Zone Europe Germany

Text	March 2013: Germany's Competition Authority fined 6 cosmetics companies (including XYZ, P&G, GSK and Gillette) a total of €39 million for exchanging competitively sensitive information in relation to personal care products, detergents and cleaning agents.
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Popup 1 Step 3

Title	Zone Europe France
Text	December 2014: France's Competition Authority fined a number of consumer products companies a combined €951 million for price fixing in supermarkets, including €189,5 million for XYZ.

Popup 1 Step 4

Title	Zone Europe Portugal
Text	June 2022: The Portuguese Competition Authority fined Unilever and four supermarket chains a combined €132 million for indirect coordination ("hub-and-spoke") in the retail sector.

Popup 2

Title	Zone LATAM
Graphic	outline of LATAM

Popup 2 Step 1

Title	Zone LATAM Brazil
Text	July 2018: The Brazilian Competition Commission imposed a combined 305 million Reais (€54,8 million) fine on companies, trade associations and individuals involved in a cartel to fix prices and allocate clients in the flexible packaging market.

Popup 2 Step 2

Title	Zone LATAM Chile
Text	April 2020: Chile's Competition Authority fined US \$21 million (€19,5 million) in a price fixing case about the poultry meat market.

Popup 2 Step 3

Title	Zone LATAM Colombia
Text	March 2021: The Colombian Competition Authority has imposed more than 2 billion pesos (\$587,391) in sanctions on 11 mining companies involved in a cartel.

Popup 2 Step 4

Title	Zone LATAM Mexico
Text	August 2021: Mexico's Competition Authority fined five drug distributors, an industry association and 21 executives the highest possible combined sanction of US \$42 million . They also disqualified senior company employees for the first time in its history.

Popup 3

Title	Zone North America
Graphic	Outline of North America

Popup 3 Step 1

Title	Zone North America Canada
Text	June 2013: Criminal charges were laid against three companies and three individuals for allegedly fixing the price of chocolate confectionery products, leading to a fine of CAD 4 million (€2,7 million) on one chocolate manufacturer (Hershey).

Popup 3 Step 2

	Zone North America United States
	September 2013: The US Department of Justice carried out a multi-year investigation of price fixing in the automotive parts industry. The FTC announced that 20 companies and 21 executives had been charged and agreed to plead guilty , with a total fine of \$1.6 billion .

Popup 3 Step 3

Title	North America Canada
Text	October 2018: Investigations involving 13 car parts manufacturers under the bid-rigging and conspiracy provisions of the Competition Act have resulted in over CAD 86 million (€60 million) in fines imposed by Canadian courts.

Popup 4	
Title	Zone North Asia
Graphic	Outline of North Asia

Popup 4 Step 1	
Title	Zone North Asia China
Text	June 2020: The Chinese Competition Authority sanctioned 19 concrete makers with a total fine of RMB 7.65 million (€1,05 million) for price fixing.

Popup 4 Step 2	
Title	Zone North Asia Japan
Text	February 2022: The Japanese Competition Authority imposed on 3 pharmaceutical wholesalers a combined fine of 416 million yen (€3 million) for rigging bids of prescription drugs sold in 57 hospitals nation-wide.

Popup 4 Step 3	
Title	Zone North Asia Korea
Text	February 2022: The Korean Competition Authority imposed a total fine of 135 billion won (€100 million) on five ice cream manufacturers and three local distributors for colluding to fix prices, rig bids and other violations.

Popup 4 Step 4	
Title	Zone North Asia Korea
Text	March 2022: The Korean Competition Authority sanctioned 16 fresh chicken-meat producers with a total fine of 175,8 billion won (€130 million) for conspiring to fix prices and restrict production and supply volumes.

Popup 5	
Title	Zone SAPMENA
Graphic	outline of SAPMENA

Popup 5 Step 1	
Title	Zone SAPMENA Saudi Arabia
Text	December 2013: Authorities imposed fines of SAR40 million (€10 million) on several companies that agreed to fix the price of rice imports for sale in retail outlets across the kingdom.

Popup 5 Step 2	
Title	Zone SAPMENA Egypt
Text	April 2021: The Egyptian court fined five of the country's major poultry brokers more than €8 million for colluding to fix the price of chicken to the detriment of consumers and chicken breeders.

Popup 5 Step 3	
Title	Zone SAPMENA India
Text	September 2021: A number of beer manufacturers were fined a combined €104 million for price fixing, collectively restricting supplies and dividing the country's beer market.

Popup 5 Step 4	
Title	Zone SAPMENA Australia
Text	November 2022: An Australian court fined a pharmaceutical ingredient company almost A\$2m for criminal cartel conduct, spanning almost 10 years, involving price fixing, bid rigging and market allocation. Its former export manager was also convicted and sentenced to over two years imprisonment.

Popup 6	
Title	Zone Sub-Saharan Africa
Graphic	outline of Sub-Saharan Africa

Popup 6 Step 1	
Title	Zone Sub-Saharan Africa South Africa
Text	August 2016: The South African Competition Commission fined ArcelorMittal R1,5 billion (€78,8 million) for colluding with other steel manufacturers, by fixing prices and discounts, allocating customers and sharing commercially sensitive information.

Popup 6 Step 2	
Title	Zone Sub-Saharan Africa Kenya
Text	August 2016: The Kenyan Competition Authority fined three companies for participating in a cartel that fixed prices for billboard advertising, for a total of 5,8 million shillings (€38.000) .

Popup 6 Step 3	
Title	Zone Sub-Saharan Africa South Africa
Text	September 2018: South Africa's Competition Tribunal fined two fertilizer companies a total fine of ZAR 281 million (€14,5 million) for fixing the price of fertilizer and allocating markets with one other company.

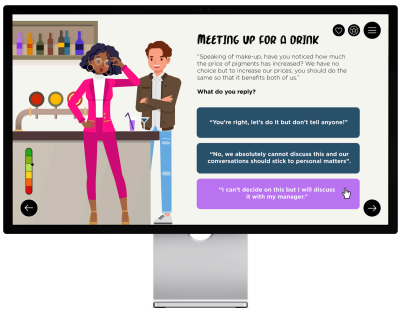
Popup 6 Step 4	
Title	Zone Sub-Saharan Africa South Africa
Text	August 2020: The South African Competition Tribunal fined a maize manufacturer R1 million (€52.000) for its involvement in a price fixing cartel in the maize milling sector.

Template	Show and tell
Page title	Be there soon

Slide number	3_6
Dev notes	Once this slide is completed, the health gauge will increase to reflect the contents of this topic being completed.

Title	Be there soon
Text	Olivia is glad she learned so much before meeting up with Leo. She didn't realize discussing product or material purchasing pricing with him, an employee of a competitor, could end up violating competition laws.
Graphic	Olivia on the street with the bar in the distance. Text to Leo telling him she will arrive soon. Text Thread reads: Olivia: Hey, Leo. I'm down the street. I'll be there in a few minutes. Leo: See you soon.
Instruction text	Select the forward arrow to continue.

Template	Scenario
Page title	Meeting up
Slide number	3_7
Dev notes	If learner gets the scenario incorrect, directions will state to try the scenario, again. If incorrect after the second try, the learner will need to go back to the start of the current topic and then get the scenario for a third time. The health gauge will increase when the learner gets the scenario correct (whether 1st or 2nd try)/no increase on additional tries

Title	Meeting up
Scenario Set Up	After a bit of catching up, Leo says: "Speaking of make-up, have you noticed how much the price of pigments has increased lately? At this point, we have no choice but to increase our prices by 7%, and you should definitely do the same so that it benefits both of us."
Question	How should Olivia reply?
Graphic	
Instruction text	Select your answer and then select the forward arrow.

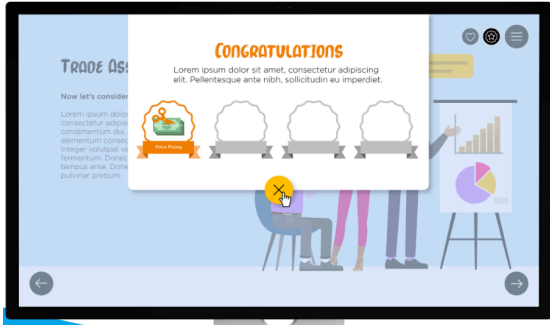
Answers	
Answer 1 text *INCORRECT*	"You're right, let's do it but don't tell anyone!"
Answer 2 text *CORRECT*	"No, we absolutely cannot discuss this and our conversations should stick to personal matters."
Answer 3 text *INCORRECT*	"I can't decide on this but I will discuss it with my manager."

Good feedback	
Title	That's correct

Text	"Agreements" include any informal communication or sharing of information capable of influencing competitors' behavior. In this discussion, Leo's "news" is an indication that his company will raise prices if the product is in shortage and necessary for competitors to compete with XYZ's products. By Olivia responding "yes", it may be interpreted as an indication that XYZ will follow and collude with a competitor which is strictly prohibited.
Graphic	A tick

Less good feedback	
Title	Let's review
Text	"Agreements" include any informal communication or sharing of information capable of influencing competitors' behavior. Please review the content and try again. Even a casual talk or sharing of information can be considered an "agreement" that may influence a competitors' behavior.
Graphic	A magnifying glass

Template	Assessment feedback
Page title	Congratulations
Slide number	3_8
Dev notes	The learner will see this screen if they get it right on the 1st try OR 2nd try. The appropriate badge, Price Fixing, will come onto the screen after “Congratulations” appears. If the learner does not get the scenario correct after the 2nd try, they will need to return to the start of the category “Price Fixing” in this instance, and review all content, again. After this screen, a popup then the learner returns to the main menu.

Pass	
Title	Congratulations
Text	You’ve earned your badge for Price Fixing! Olivia avoided violating regulations and helped XYZ avoid any potential consequences. She learned to never discuss pricing, agree to pricing, or strike a deal about pricing with a competitor. Back to the airport!
Graphic	
Instruction text	Select the Back to menu button to continue.

Topic 3-Other Competitor Issues

POP UP when learner clicks to move one	
Title	Time for take off
Text	Destination: The big city for the trade association meeting tomorrow.
Instruction text	Select the X to continue.
Graphic	image of airplane; showing some motion like it is taking off
Dev notes	This should appear after the learner selects Topic 3 from the main menu and then go straight into the following screen

Template	Step by step
Page title	Sharing
Slide number	4_1
Dev notes	all steps must be seen before learner can move on

Overall title	Sharing
Instruction text	Select the forward arrow to continue.

Step 1	
Title	What else?
Text	Olivia is taking the subway to the Green Your Cosmetics trade association meeting. On her way, she starts to wonder, "Are there any other illegal arrangements I need to watch out for?" She decides to use her laptop to research more about competition laws.
Graphic	Olivia on a subway with a laptop open—the learner can see the subway details (advertisements, other people (can be silhouettes), exit sign, etc etc)

Step 2	
Title	Sharing markets
Text	It is illegal for competitors to agree to share markets or customers. Even if these are their traditional markets, it is illegal for competitors to agree to divide up markets along national, regional, or other geographic lines.

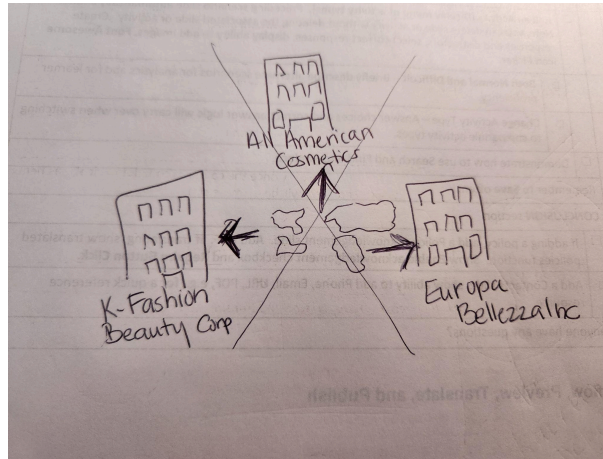
Graphic

Image with business buildings; a grouping of countries, arrows pointed to the businesses, an X or a  over the top indicating this action cannot be done

Business names in the graphic need to be:

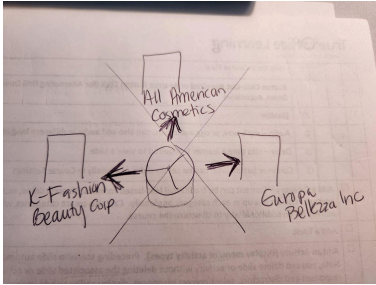
- All American Cosmetics
- Europa Bellezza Inc.
- K-Fashion Beauty Corp.

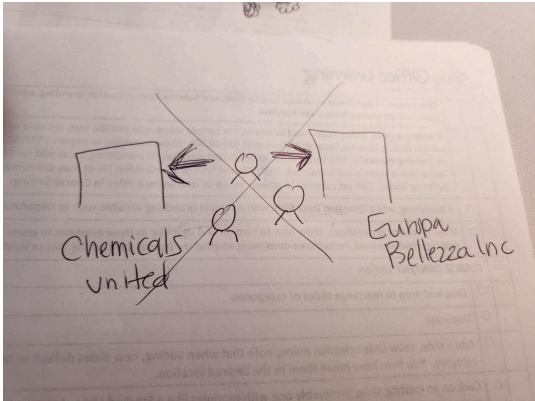
Step 3**Title**

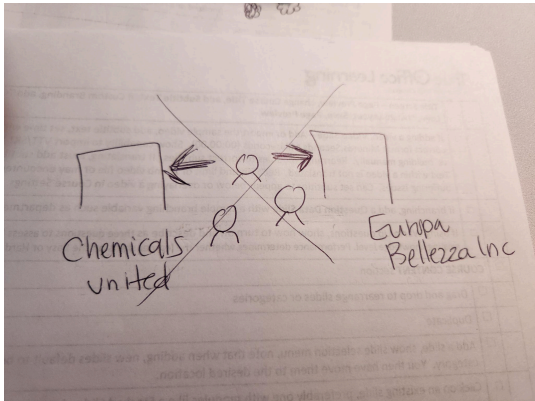
Sharing by percentage share or volumes

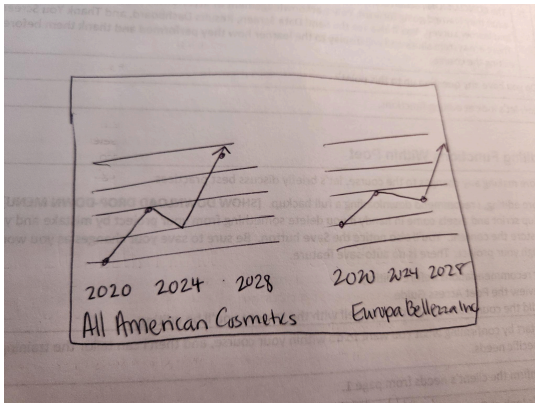
Text

It is also illegal for competitors to agree that the market should be allocated between them according to agreed market share percentages or volumes. This includes agreeing to approximate share allocations, agreeing to divide any growth in the market, or sharing any "pain" as a market contracts.

Graphic	Image with business buildings; a pie chart, arrows pointed to the businesses, an X or a  over the top indicating this action cannot be done Business names in the graphic need to be: • All American Cosmetics • Europa Bellezza Inc. • K-Fashion Beauty Corp. 
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Step 4	
Title	Sharing by industry or customer type
Text	Another form of market allocation, which is strictly illegal, is for competitors to agree to assign certain customers to each other.
Graphic	 Image with business buildings; a grouping of countries, arrows pointed to the businesses, an X or a  over the top indicating this action cannot be done Business names in the graphic need to be: • All American Cosmetics • Europa Bellezza Inc. • K-Fashion Beauty Corp. Same layout and function as previous graphics in this step by step.

Step 5	
Title	Sharing employees
Text	It is also illegal for companies, even of different sectors, to agree not to poach their respective employees.
Graphic	 Image with business buildings; a grouping of countries, arrows pointed to the businesses, an X or a  over the top indicating this action cannot be done Business names in the graphic need to be: • Chemicals United • Europa Bellezza Inc.

Step 6	
Title	Limiting or controlling
Text	Competitors must not agree to limit or control their production capacity or their actual production even in situations of oversupply in the industry. Similarly, competitors must not discuss who will build new plants or when they will do so.
Graphic	 Business names in the graphic need to be:

	• All American Cosmetics • Europa Bellezza Inc.
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Template	Image map
Page title	Trade associations
Slide number	4_2
Dev notes	Hotspots need to be made available in the set order presented here. The next available hotspot gets highlighted/outlined in some way

Title	Trade associations
Intro text	Olivia has arrived at the meeting and looks forward to learning more about how trade association meetings function and their purpose, but she wonders how this will help her with that big project waiting for her after the trip.
Main graphic	Olivia in a conference room that is located on a high leveled floor of a downtown city skyscraper. You can see: a presentations area (screen, chairs in rows), smaller tables with people gathered (can be from a distance and minimal detail) around using computers, charts on the wall, pamphlets/magazines, vendor tables with items set out (booklets, etc), a coffee station/snack table, etc Triggers: the presentation screen, a line graph chart on the wall, the coffee area, a computer on the table
Instruction text	Click around the room to learn more about the function and purpose of this meeting. Then, select the forward arrow to continue.

Popup 1	
Icon	Check mark (tick mark)
Title	Functions
Text	Trade associations have legitimate functions such as reviewing proposed legislation, and collaborating on health, safety and environmental issues. Be cautious, such meetings have already been used for illegal arrangements and discussions.
Graphic	Trigger: presentation screen

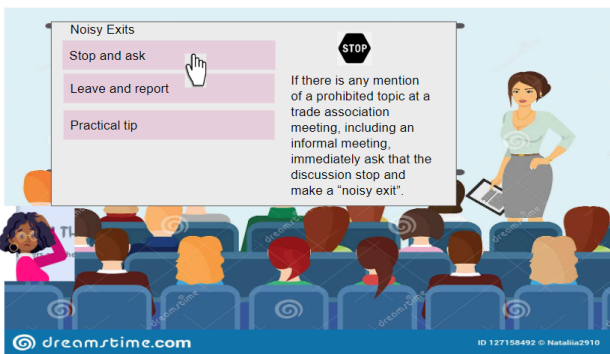
Popup 2	
Icon	 -something like this

Title	Top Rules
Text	The trade association should only discuss matters that are entirely legitimate. There should always be an agenda for every meeting, including any sub-group. Meetings should be attended only by relevant and properly designated representatives.
Graphic	Trigger: line graph chart on the wall

Popup 3	
Icon	
Title	Minutes
Text	There should always be formal minutes, whether for task-force and working-group meetings. The absence of formal minutes has made it difficult for some trade associations to effectively defend against accusations of wrongdoing.
Graphic	Trigger: coffee area

Popup 4	
Icon	Light bulb
Title	Practical tip
Text	Basic rules for trade association meetings: • Have an agenda • Take formal minutes • Only relevant representatives attend meetings • Do not discuss or share information on prohibited topics
Graphic	Trigger: computer on a table

Template	Click and tell
Page title	A noisy exit
Slide number	4_3
Dev notes	

Overall title	A noisy exit
Intro text	Olivia joins a presentation and learns about how to address tricky situations.
Instruction text	Select each tab to view the information.
Graphic?? Does an image exist here before the categories are selected?	This screen can appear as if it is the presentation....presenter does not need to be present, but Olivia is in the crowd and the learner sees the back of heads (chatted with Georgia 4/20--this is workable) **idea image only below** 

Category 1	
Title	Stop and ask
Text	If there is any mention of a prohibited topic at any point of a trade association meeting, immediately ask that the discussion stop and make a “noisy exit”. If you are not sure whether a topic is illegal or not, ask for the discussion to be suspended. Seek legal advice.
Graphic	Stop sign or a “NO” style icon

Category 2	
Title	Leave and report
Text	Make a note that the discussion stopped. If the discussion is not stopped, leave the meeting immediately and ask this be expressly reflected in the minutes. In most countries, the mere fact of staying at a meeting where there were illegal discussions can make you and your company liable.

	Report the incident to your Legal department.
Graphic	 Person walking out of a door icon

Category 3	
Title	Practical tip
Text	Noisy Exit • Ask to stop the discussion • Make a note that the discussion stopped • If not, leave the meeting and make sure you are noticed • Report the incident to your legal department
Graphic	Icon of light bulb

Template	Step by step
Page title	Cartels fined!
Slide number	4_4
Dev notes	

Overall title	Cartels fined!
Instruction text	Select the forward arrow to continue.

Step 1	
Title	Pitfalls
Text	Remember, industry social events are full of potential pitfalls. Be sure that all discussions are purely social. Even listening to a discussion amongst competitors about prices, markets, customers or production can mean being involved in illegal collusion. Take a look at the consequences of a few groups who weren't careful!
Graphic	 a warning symbol of sorts

Step 2	
Title	Caught!
Text	In 2011, three members of the Association for soaps, detergent, and maintenance products (P&G, Unilever and Henkel) were fined over EUR 315 million by the European Commission for participating in a cartel for laundry detergents. The companies determined methods to reduce the weight of detergent powders and packaging waste. They agreed not to lower prices when making packages smaller and later raised prices together.
Graphic	Box of detergent icon

Step 3	
Title	Busted!
Text	From 2000 to 2008, employees of nine food packaging companies held secret meetings to discuss raising prices to cover the cost of raw materials. They met on the fringes of legitimate industry gatherings and disguised their discussions. One participant reported this to the European Commission in exchange for full immunity, the other eight were fined a total of EUR 118,8 million.

Graphic

Some sort of food packaging icon



Template	Show and tell
Page title	Friendly chat
Slide number	4_5
Dev notes	Once this slide is completed, the health gauge will increase to reflect the contents of this topic being completed.

Title	Friendly chat
Text	Olivia learned quite a bit about sharing things beyond prices and trade associations. She now knows the consequences of violating the rules. Olivia walks over to a group of other meeting attendees she met earlier in the day to check in with their thoughts.
Graphic	Olivia talking up to a group of diverse people of about 3-4 people gathered and standing/sitting around a table
Instruction text	Select the forward arrow to continue.

Template	Scenario
Page title	Excuse me?
Slide number	4_6
Dev notes	If learner gets the scenario incorrect, directions will state to try the scenario, again. If incorrect after the second try, the learner will need to go back to the start of the current topic and then get the scenario for a third time. The health gauge will increase when the learner gets the scenario correct (whether 1st or 2nd try)/no increase on additional tries

Title	Excuse me?
Scenario Set Up	Olivia hears a competitor say: "Let's talk about the draft law starting in five years imposing materials that are 100% biodegradable and derived from plants. This will get expensive and we'll need to adjust our supply chain. Let's wait until it's mandatory before we change anything." The others reply, "Great idea!"
Question	How should Olivia reply?
Graphic	a group of diverse people of about 3-4 people gathered and standing/sitting around a table (from previous slide); some appear to be talking
Instruction text	Select your answer and then select the forward arrow.

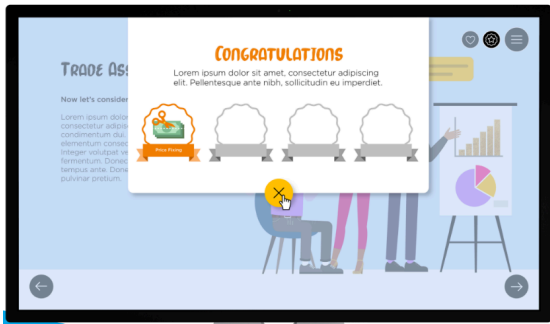
Answers	
Answer 1 text INCORRECT	"Ok, I'm in!"
Answer 2 text INCORRECT	Stay quiet. She should wait and see what will actually happen.
Answer 3 text INCORRECT	"I would rather not say anything as of now because I need to consult my Legal department. Let's move on to the next topic."
Answer 4 text CORRECT	"I refuse to be part of this and will leave immediately. Please write this in the minutes."

Good feedback	
Title	That's correct

Text	Colluding on the timing of innovation is illegal. Remember, when a prohibited topic is mentioned, make a “noisy exit”. Stop the discussion, make note that it stopped, if it doesn’t, leave and be sure you are noticed leaving. Always report the incident to your Legal department.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	Remember, when a prohibited topic is mentioned, make a “noisy exit”: • Ask to stop the discussion • Make a note that the discussion stopped • If not, leave the meeting and make sure you are noticed leaving • Report the incident to the legal department. Please review the content and try again.
Graphic	A magnifying glass

Template	Assessment feedback
Page title	Congratulations
Slide number	4_7
Dev notes	The learner will see this screen if they get it right on the 1st try OR 2nd try. The appropriate badge, “Other Competitor Issues” will come onto screen after “Congratulations” appears. If the learner does not get the scenario correct after the 2nd try, they will need to return to the start of the category “Other Competitor Issues” in this instance, and review all content, again. When they click to move on, an airplane appears and is “taking off”, then the learner returns to the main menu.

Pass	
Title	Congratulations
Subtitle	You’ve earned your badge for Other Competitor Issues! Olivia avoided getting involved in an illegal conversation and helped XYZ avoid any potential consequences. She learned the appropriate way to make a “noisy exit” and how to avoid getting caught up in something illegal.
Graphic	
Instruction text	Select the Back to menu button to continue.

Topic 4-Resale Price Maintenance

POP UP before starting Topic 4	
Title	Next stop!
Text	Now, off to the gate to catch her flight to a famous retail store in the country's largest city.
Instruction text	Select the X to continue.
Graphic	An airplane "taking off" symbolizing Olivia taking off to her next destination.
Dev Notes	This pops up when the learner clicks Topic 4 and will be seen before going into the next screen (Now arriving)

Template	Show and tell
Page title	Now arriving
Slide number	5-1
Dev notes	

Title	Now arriving
Text	Olivia has been sent to check out XYZ products in a high-end retail store. If she hopes to land that big project, she needs to pay close attention to the rules around resale pricing set by customers.
Graphic	Olivia entering the doors of a "fancy" retail store—one door open and her looking in...or from a wide perspective one may get upon entering. You can see some clothing, shoes, accessories, but a large part of the store should include: perfumes, soaps, cosmetics, shampoos, conditioners, lotions, facial care products, 
Instruction text	Select the forward arrow to continue.

Template	Image map
Page title	Resale price maintenance
Slide number	5_2
Dev notes	Hotspots need to be accessed in order outlined below per client request. Each trigger can be highlighted/outlined when available.

Title	Resale price maintenance
Intro text	A main goal of competition law is to benefit consumers.
Main graphic	The interior of the high end retail store, focused on the beauty section (perfumes, cosmetics, shampoos, etc) [XYZ's LUXE brands.]  Triggers: a lipstick, a bottle of makeup (foundation), a bottle of perfume
Instruction text	Click on the available products to learn about resale pricing. Then, select the forward arrow to continue.

Popup 1	
Icon	Price Tag
Title	Low prices
Text	Competition law helps keep prices low. In most jurisdictions, it is prohibited for a supplier to agree to a fixed or minimum resale price for the customer. While recommended resale prices are usually legal, the supplier cannot pressure or apply incentives to stop a customer from discounting.
Graphic	Trigger: lipstick

Popup 2	
Icon	 A hand refusing
Title	Illegal pressure

Text	Illegal pressure includes threats to refuse supplies, to delay deliveries, or to withhold rebates or other benefits.
Graphic	Trigger: a bottle of makeup (foundation)

Popup 3	
Icon	 an icon like this, but with a “no” slash and circle
Title	Illegal incentives
Text	Illegal incentives include promises to grant a discount or provide other benefits only if the customer sticks to the recommended resale price. DO: Recommend resale prices with no illegal pressure or incentives DO NOT: Fix customers’ resale prices
Graphic	Trigger: perfume

Template	Click and tell
Page title	Beware
Slide number	5_3
Dev notes	

Overall title	Beware
Intro Text	Navigating conversations with customers can get tricky. Be familiar with the laws and regulations.
Instruction text	Select the forward arrow to continue.

Category 1	
Title	Don't get involved
Text	Be cautious if one of your customers complains about another customer selling your products too cheaply. Do not get involved in incentivizing the discounting customer to agree to raise their prices.
Graphic	Someone shaking their head

Category 2	
Title	Avoid
Text	Be sure to avoid arranging for a truce under which both customers will stick to reasonable prices. This would mean getting involved in illegal price fixing between competing customers.
Graphic	 with a slash through it

Step 3	
Title	Be clear
Text	You must be absolutely clear that each customer must decide their own resale prices independently. You cannot intervene in this business decision with either customer nor facilitate collusion between them.
Graphic	Speech bubble with an exclamation point

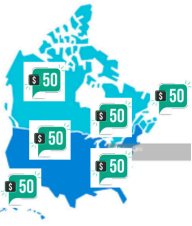
Step 4	
Title	Practical tip
Text	Do not get involved in: • incentivizing the discounter to raise prices • arranging illegal price fixing between customers. Be clear that each customer must decide their own resale prices independently.
Graphic	Icon of light bulb

Template	Step by step
Page title	Minimum Advertised Pricing (MAP)
Slide number	5_5
Dev notes	

Overall title	Minimum Advertised Pricing (MAP)
Instruction text	Select the forward arrow to continue.

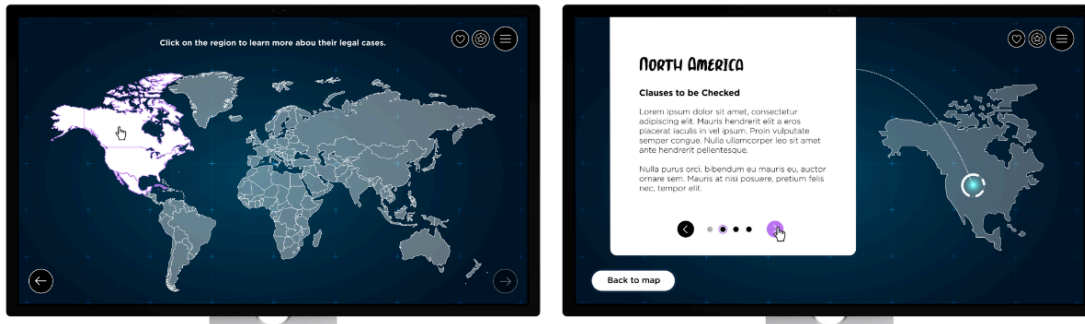
Step 1	
Title	MAP policy
Text	MAP Policy is not universal and applies only in the United States and Canada. A MAP policy is a unilateral policy meaning it is applied to all customers equally. The “unilateral” nature of MAP policies avoids antitrust laws which normally require an “agreement between two or more parties” regarding price. It differs from a minimum resale price policy as it only concerns advertised prices, not actual prices.
Graphic	A collection of about three store fronts, all with a large “sale” sign, and each showing the same price; include cosmetic products in the windows *image below serves as an idea, only* 

Step 2	
Title	Required conditions
Text	In the United States and Canada, MAP policies generally raise minimal antitrust risk, as long as some conditions are fulfilled: • They have to be strictly unilateral, meaning that there has to be no involvement or negotiation by the customer. • They also have to be strictly applied equally, to all customers, with no exceptions.

Graphic	 map image of US and Canada and a price marker that is the same price place in different areas of both the US and Canada *image serves as an idea only*
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Step 3	
Title	Practical tip
Text	When it comes to MAP policies: • a written policy with a rationale should be issued unilaterally by the supplier • the policy should state the covered products and applicable advertised prices and not be included in a customer agreement • the consequences of noncompliance should be clearly stated • the supplier alone should enforce the policy and establish reporting requirements.
Graphic	Light bulb icon; same icon as other “practical tips”

Template	Image map with Step by Step
Page title	Resale price maintenance cases
Slide number	5--6
Dev notes	see image below-we combined an image map with a step by step (the learner click on their applicable region then reads through several examples for that region)



Title	Resale price maintenance (RPM) cases
Intro text	RPM can have severe consequences for all sizes of business.
Main graphic	World map
Instruction text	Click on the region where you conduct business and use the arrows to read through real cases. Then, return to the map and select the forward arrow to continue.

Popup 1	
Title	Zone Europe
Graphic	outline of the EU

Popup 1 Step 1	
Title	Zone Europe Germany
Text	July 2013: Germany's Competition Authority imposed fines totaling €6.5 million on a natural cosmetics manufacturer (WALA Heilmittel) for vertical price fixing practices involving Dr. Hauschka cosmetics products.

Popup 1 Step 2	
Title	Zone Europe
Text	December 2018: The European Commission fined the clothing company, Guess, €40 million for resale price maintenance. The practice also involved

	preventing distributors from selling Guess products beyond national borders, with a restriction on the use of online search advertising and geo-blocking.
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Popup 1 Step 3

Title	Zone Europe UK
Text	January 2020: The UK Competition Authority fined a manufacturer of musical instruments £4.5 million (€5 million) for requiring online retailers to sell the company's instruments at or above a minimum price.

Popup 1 Step 4

Title	Zone Europe Poland
Text	January 2023: Poland's Competition Authority fined a cleaning equipment manufacturer (Kärcher) €5.5 million for imposing minimum resale prices on its distributors.

Popup 2

Title		Zone Europe
Graphic		outline of the EU

Popup 2 Step 1

Title	Zone LATAM Brazil
Text	January 2013: The Brazilian Competition Authority fined a car parts manufacturer 1% of its yearly turnover for implementing a minimum margin policy for around one year.

Popup 2 Step 2

Title	Zone LATAM Colombia
Text	2015: The Colombian Competition Authority fined a rice producer and four executives a total of 33,8 billion pesos (€12 million) for prohibiting retailers from passing on discounts to final consumers, thus maintaining artificially high retail prices.

Popup 3	
Title	Zone North America
Graphic	Outline of North America

Popup 3 Step 1	
Title	Zone North America
Text	Retail price maintenance (RPM) remains problematic under US antitrust law due to the split between federal and some state antitrust laws.

Popup 3 Step 2	
Title	North America
Text	Minimum RPM continues to present antitrust risk for national companies due to the fact that certain states continue to treat minimum RPM as per se illegal (California and Maryland) or unenforceable as a matter of law (New York and New Jersey).

Popup 3 Step 2	
Title	Zone North America
Text	Therefore, suppliers doing business across the US should consider restrictions on minimum prices as generally impermissible.

Popup 4	
Title	Zone North Asia
Graphic	Outline of North Asia

Popup 4 Step 1	
Title	Zone North Asia Korea
Text	January 2014: The Korean Competition Authority fined a subsidiary of Johnson & Johnson 1.8 billion won (€1,6 million) for preventing retailers of some contact-lens products from cutting prices.

Popup 4 Step 2	
Title	Zone North Asia China

Text	April 2021: The Chinese Competition Authority imposed a fine of RMB 764 million (€104,6 million) on a domestic pharmaceutical group for entering into resale price maintenance agreements with its various distributors for several medicine products.
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Popup 4 Step 3	
Title	Zone North Asia China
Text	September 2021: The Chinese Competition Authority imposed a fine of RMB 294.81 million (€40,4 million) on a domestic power and digital accessory manufacturer for entering into resale price maintenance agreements with its various distributors for several digital accessory products.

Popup 4 Step 3	
Title	Zone North Asia Japan
Text	May 2022: The Japanese Competition Authority settled with a Japanese ramen brand after it was accused of prohibiting retailers and resellers from selling its instant ramen at discounted prices.

Popup 5	
Title	Zone SAPMENA
Graphic	outline of SAPMENA

Popup 5 Step 1	
Title	Zone SAPMENA India
Text	June 2017: The Indian Competition Authority fined Hyundai Motor India 870 million rupee (€12,6 million) for RPM. The company was setting discount controls and penalties for non-compliance, effectively forcing dealers to keep within a maximum permissible discount.

Popup 5 Step 2	
Title	Zone SAPMENA Australia
Text	March 2021: An Australian court fined a sporting goods supplier A\$350,000 (€227.000) for engaging in RPM. In addition, the company had to refrain from

	prohibiting discounting in dealer contracts and had to implement an internal compliance program.
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Popup 5 Step 3

Title	Zone SAPMENA India
Text	August 2021: The Indian Competition Commission imposed a fine of ₹200 crores (€22,6 million) on an automobile manufacturer for participating in anti-competitive conduct by restraining dealers from offering discounts to customers beyond those prescribed by the manufacturer.

Popup 5 Step 4

Title	Zone SAPMENA Egypt
Text	September 2022: The Egyptian Competition Authority issued its first infringement decision against a dominant supplier of fresh yeast. The supplier offered remedies to address the RPM concern.

Popup 6

Title	Zone Sub-Saharan Africa
Graphic	outline of Sub-Saharan Africa

Popup 6 Step 1

Title	Zone Sub-Saharan Africa South Africa
Text	June 2004: The South African Competition Authority fined Toyota R12 million (€630.000) for RPM.

Popup 6 Step 2

Title	Zone Sub-Saharan Africa South Africa
Text	August 2016: The South African Competition Tribunal fined the home appliances manufacturer SMEG R100.000 (€5.200) for imposing RPM on its retailers.

Popup 6 Step 3

Title	Zone Sub-Saharan Africa South Africa
Text	December 2019: The South African Competition Authority fined a fabrics company R150000.00 (€7.800) for imposing RPM on its retailers. It had demanded that a retailer increase its prices by at least 50% or its account would be terminated.

Template	Show and tell
Page title	What a sale!
Slide number	5_7
Dev notes	Once this slide is completed, the health gauge will increase to reflect the contents of this topic being completed.

Title	What a sale!
Text	After visiting the store, Olivia has a much clearer understanding of what she can and cannot say about resale pricing to her customers. She'll be sure to keep this in mind for that big project. Olivia begins to look closer at some of the luxury products this retailer has to offer.
Graphic	Olivia will be looking at luxury products, specifically perfumes up close. The same luxe line of products can also be included in the background/periphery. She may be reaching for one of the bottles.--if she is, it needs to be: Brand: Lancôme Perfume name: La vie est belle Size: 100ml
Instruction text	Select the forward arrow to continue.

Template	Scenario
Page title	How much?
Slide number	5_8
Dev notes	If learner gets the scenario incorrect, directions will state to try the scenario, again. If incorrect after the second try, the learner will need to go back to the start of the current topic and then get the scenario for a third time. The health gauge will increase when the learner gets the scenario correct (whether 1st or 2nd try)/no increase on additional tries

Title	How much?
Scenario Set Up	Olivia picks up a bottle of premium fragrance and sees the sales price. "Only \$49.99? How can our flagship product be sold for so cheap? That is way lower than our recommended price list and is damaging our brand equity!"

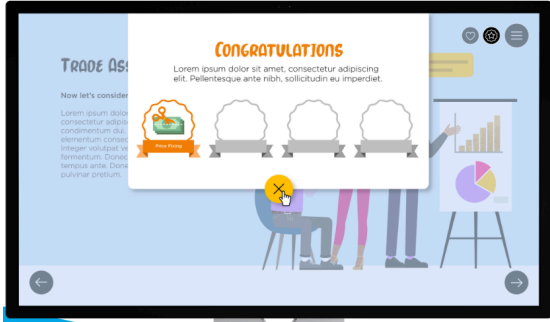
Question	What can Olivia tell the sales representative about the price?
Graphic	Olive is holding a bottle of perfume: Brand: Lancôme Perfume name: La vie est belle 100ml It will have a bright red tag, there is an original price (\$150.00) crossed out and the new price is \$49.99
Instruction text	Select your answer and then select the forward arrow.

Answers	
Answer 1 text INCORRECT	"This price isn't acceptable and damages our image. Respect the resale price, or we will stop working together!"
Answer 2 text INCORRECT	"These prices are way too low. Let's look at the recommended price list again".
Answer 3 text CORRECT	She shouldn't say anything.
Answer 4 text INCORRECT	"These prices are really low. How do you price structure and discount our luxury products?"

Good feedback	
Title	That's correct
Text	It is illegal to tell your retailer to stop discounting or to threaten in relation to its discounting. You cannot insist that they price at Recommended Retail Price or take other action that restricts their pricing freedom. Also, you should not threaten to delay delivery or engage in other threats in relation to discounting dealers.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	It is illegal to tell your retailer to stop discounting or to threaten in relation to its discounting. Telling your retailer to stop discounting or to threaten in relation to discounting is considered illegal. Please review the content and try again.
Graphic	A magnifying glass

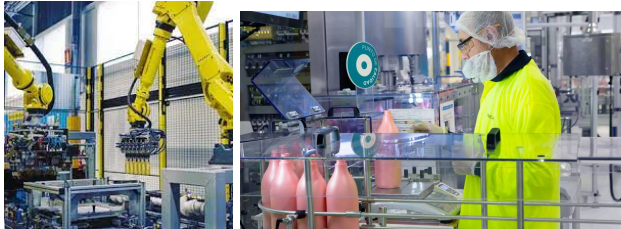
Template	Assessment feedback
Page title	Congratulations
Slide number	5_9
Dev notes	The learner will see this screen if they get it right on the 1st try OR 2nd try. The appropriate badge, “Resale Pricing” for this topic will come onto screen after “Congratulations” appears. If the learner does not get the scenario correct after the 2nd try, they will need to return to the start of the category “Resale Pricing” in this instance, and review all content, again. When they click “Menu”, can we put a screen of an airplane “taking off”/like a pop up---like the one used earlier in the course? Then return to the main menu.

Pass	
Title	Congratulations
Text	You’ve earned your badge for Resale Pricing! Olivia avoided getting involved in a tricky conversation. It is a good thing she learned about how competition law makes it illegal to restrict resale pricing. She wouldn’t want trouble for herself, or for XYZ.
Graphic	
Instruction text	Select the Back to menu button to continue.

Topic 5-Other Issues

POP UP before starting Topic 5	
Title	Now boarding
Text	Olivia is off to catch her flight to a key factory that produces one of XYZ's hair care lines, Kérastase.
Instruction text	Select the X to continue.
Graphic	An airplane "taking off" symbolizing Olivia taking off to her next destination.
Dev Notes	This pops up when the learner clicks Topic 5 and shows before the next screen (Final Stop).

Template	Show and tell
Page title	Final stop
Slide number	6_1
Dev notes	

Title	Final stop
Text	Olivia has reached her final destination and is eager to explore and learn more about what to look out for when interacting with customers and consumers. This visit to the factory will give her the last bit of knowledge she needs to tackle the lead on that big project coming her way.
Graphic	Olivia arriving at a factory that produces hair care ingredients. This video has images from the actual factory Exterior/Interior 
Instruction text	Select the forward arrow to continue.

Template	Image map
Page title	Other arrangements
Slide number	6_2
Dev notes	The hotspots should be available one at a time, in the order listed below, can each out be outlined when it becomes available

Title	Other arrangements
Intro text	Some arrangements go beyond pricing and need to be checked out with the legal department. These types of arrangements include exclusivity and non-compete clauses, territory restrictions and tying.
Main graphic	Image of interior of a lab within a factory In this scene, we have a scientist, they are interacting with beakers and test tubes. There is other equipment in the background—vials of liquids, etc. on a shelf, microscope, computer screen(s), poster on the wall (idea below) Triggers: a beaker, a computer screen, microscope, vials of liquid  Poster: 
Instruction text	Click on the items around the factory to learn more about these agreements.

Popup 1	
Icon	 Similar to this?
Title	What are exclusivity clauses?
Text	These agreements are when the customer agrees to buy only from us and not buy competing goods from another supplier. These clauses are often perfectly legal but can depend on the countries in question and particular circumstances such as our market share, duration and number of customers bound by the exclusivity.

Graphic	Trigger: beaker
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Popup 2	
Icon	A bow tied with a string
Title	What's tying?
Text	These agreements are when a supplier may want to supply a product only on the condition the customer also buys another product or bundle. In many jurisdictions around the world tying is prohibited if the supplier has market power.
Graphic	Trigger: computer screen

Popup 3	
Icon	Stack of money icon
Title	Do I have to charge the same?
Text	Generally, a supplier can charge different prices to different customers. Price differentials are sensitive when the supplier has substantial market power and when a customer depends on the supplier.
Graphic	Trigger: microscope

Popup 4	
Icon	 something to represent the legal department—a person with legal in the background
Title	What if I have questions?
Text	These types of arrangements can get complicated, especially in our global market. Always reach out to the legal department and ask questions before moving forward.
Graphic	Trigger: vials of liquid

Template	Click and tell
Page title	Territory restrictions
Slide number	6_3
Dev notes	

Overall title	Territory restrictions
Intro text	The most important thing to remember when using territory restrictions, is to always check with the legal department first.
Instruction text	Select each tab to view the information.

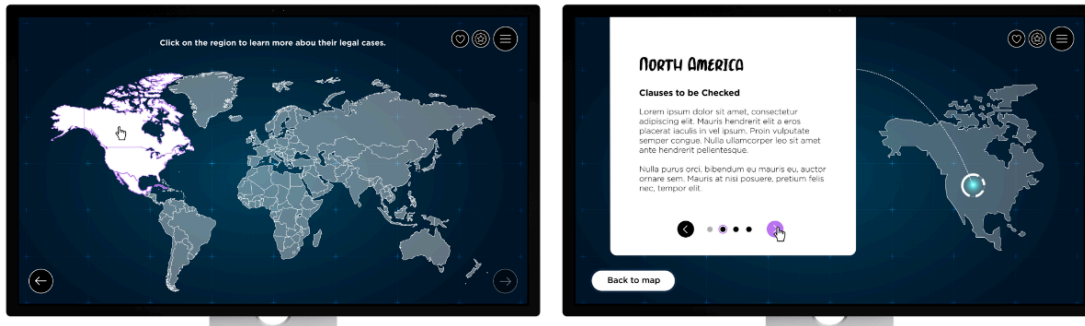
Category 1	
Title	European Union
Text	In the EU, competition law helps create a single market in which goods circulate freely. Export bans and other restrictions that prevent reselling within countries (including the UK and Switzerland) or within the EU are serious violations.
Graphic	Outline of the EU

Category 2	
Title	European Union customers
Text	Customers must be free to sell in response to unsolicited requests from consumers outside their territory. However, customers can often be prevented from actively advertising and soliciting sales.
Graphic	Outline of the EU

Category 3	
Title	Similar clauses
Text	Competition law in Canada, Australia, New Zealand, the Andean Community of Latin America and other parts of the world also apply similar clauses as the EU and may prohibit them if they have a highly restrictive effect on the market.
Graphic	 something to show a group of other people

Category 4	
Title	United States
Text	In the US, a supplier is generally allowed to impose territorial restrictions on their customers within or outside the country, especially if the supplier does not have a significant share of the relevant market.
Graphic	Outline of the US

Template	Image map with Step by Step
Page title	Abuse of dominance cases
Slide number	6_4
Dev notes	see image below-we combined an image map with a step by step (the learner click on their applicable region then reads through several examples for that region)



Title	Cases
Intro text	Certain business practices can have severe consequences, especially when having high market shares.
Main graphic	World map
Instruction text	Click on the region where you conduct business and use the arrows to read through real cases.

Popup 1	
Title	Zone Europe Greece
Text	November 2022: Greece's Competition Authority fined a soft drinks bottler €10 million for concluding exclusivity agreements with retailers.
Graphic	outline of the EU

Popup 2	
Title	Zone LATAM
Graphic	"rough" outline of LATAM

Popup 2 Step 1

Title	Zone LATAM Brazil
Text	October 2018: Brazil's Competition Authority fined Unilever 29,4 million Brazilian reais (€7,5 million) for imposing exclusivity and loyalty rebate schemes on local ice cream retailers.

Popup 2 Step 2

Title	Zone LATAM Argentina
Text	August 2021: Argentina's Competition Authority has fined a beer producer US \$1.54 million (€1,4 million) as part of its first-ever decision to penalize exclusivity provisions created through the use of loyalty discounts.

Popup 3

Title	Zone North America
Graphic	Outline of North America

Popup 3 Step 1

Title	Zone North America United States
Text	December 2021: In the US, a drug company settled to pay \$40 million in damages. It is alleged they schemed to illegally block a generic drug company from entering the market and dramatically increased its price. One of its executives was barred from the drug industry and fined \$64 million.

Popup 4

Title	Zone North Asia
Graphic	Outline of North Asia

Popup 4 Step 1

Title	Zone North Asia Korea
Text	October 2020: The Korean Competition Authority fined the internet giant Naver 26.7 billion won (€21 million) for manipulating search algorithms to give an unfair advantage to its shopping services and video-streaming services.

Popup 4 Step 1

Title	Zone North Asia China
Text	October 2021: The Chinese Competition Authority imposed a fine of RMB 3.44 billion (€472 million) on a food delivery giant, Meituan, for punishing merchants who refused to comply with exclusivity agreements by charging them high commission rates and granting them less exposure on its platform.

Popup 5

Title	Zone SAPMENA
Graphic	outline of SAPMENA

Popup 5 Step 1

Title	Zone SAPMENA India
Text	October 2022: India's Competition Authority fined a major tech company (Google) €65 million for obliging smartphone manufacturers to pre-install its apps.

Popup 5 Step 1

Title	Zone SAPMENA Egypt
Text	December 2020: The Egyptian Competition Authority sanctioned a manufacturer of alcoholic beverages for (1) concluding exclusive supply contracts with the majority of local retail outlets; (2) tying arrangements (between beer and wine); (3) and other abusive practices.

Popup 6

Title	Zone Sub-Saharan Africa
Graphic	outline of Sub-Saharan Africa

Popup 6 Step 1

Title	Zone Sub-Saharan Africa South Africa
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Text	January 2019: The South African Competition Tribunal sanctioned Computicket, an event-ticketing company, with a R20 million fine (€1 million) for exclusivity contracts aimed at shutting out new entrants from the market between 2005 and 2010."
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Template	Show and tell
Page title	Exclusivity deals
Slide number	6_5
Dev notes	Once this slide is completed, the health gauge will increase to reflect the contents of this topic being completed.

Title	Exclusivity deals
Text	Olivia's flight leaves in just a few hours. She's excited to let Geraldine know everything she's learned and to prove she is ready to lead a team on the upcoming project. On her way out of the factory, Olivia meets up with a representative who supplies a key ingredient for Kérastase products. They discuss the current supply contract.
Graphic	Olivia with the factory setting in the background, meeting up with another character (the supplier's representative)---business dress.
Instruction text	Select the forward arrow to continue.

Template	Scenario
Page title	Do we have a deal?
Slide number	6_6
Dev notes	If learner gets the scenario incorrect, directions will state to try the scenario, again. If incorrect after the second try, the learner will need to go back to the start of the current topic and then get the scenario for a third time. The health gauge will increase when the learner gets the scenario correct (whether 1st or 2nd try)/no increase on additional tries

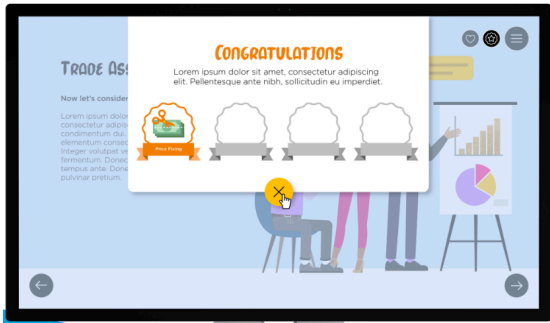
Title	Do we have a deal?
Scenario Set Up	At the end of their conversation the representative says: “You are lucky to be dealing with us, as you know with the current raw material shortage, we are the only ones in the region that can produce this oil-based ingredient for your Kératase products.” Olivia responds, “Yes, we are aware, and we’d like to offer a deal. How about we agree to a 15% price increase in exchange, you agree to exclusively supply us?”
Question	Is Olivia allowed to make this offer?
Graphic	Olivia is standing with the representative with the factory in the background (can likely be the same image as on the previous screen)
Instruction text	Select your answer and then select the forward arrow.

Answers	
Answer 1 text INCORRECT	Yes
Answer 2 text INCORRECT	No
Answer 3 text CORRECT	It depends on the market concerned. She should ask her Legal department first.

Good feedback	
Title	That’s correct
Text	Depending on the market and XYZ’s position in that market, it can be illegal to enter into exclusive supply contracts with suppliers. For example, this might be the case if the product is in shortage and necessary for competitors to compete with products. Always ask your legal department.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	Depending on the market and XYZ's position in that market, it can be illegal to enter into exclusive supply contracts with suppliers. Sometimes it can be illegal to enter into an exclusive supply contract with a supplier, depending on the market and XYZ's position in that market. Please review the content and try again.
Graphic	A magnifying glass

Template	Assessment feedback
Page title	Congratulations
Slide number	6_7
Dev notes	The learner will see this screen if they get it right on the 1st try OR 2nd try. The appropriate badge, “Clauses and Restrictions” for this topic will come onto screen after “Congratulations” appears. If the learner does not get the scenario correct after the 2nd try, they will need to return to the start of the category “Clauses and Restrictions” in this instance, and review all content, again. After the Congratulations screen, there will be a pop up. This will lead them directly to an email screen then into the final assessment.

Pass	
Title	Congratulations
Subtitle	
Text	You’ve earned your badge for Clauses and Restrictions!
Graphic	
Instruction text	Select the Back to menu button to continue.

Final POP UP before proceeding to the final assessment	
Title	Nearing the end
Text	Olivia knew her best option was to contact the Legal department. Competition law varies all over the world and it is always best to seek legal advice before making offers. She wouldn't want trouble for herself, or for XYZ. Now, off to check her email and see if there is any news from Geraldine.
Instruction text	Select the X to continue.
Graphic	laptop computer

Dev Notes	This pops up when the learner goes to proceed when moving on from the Congratulations screen. When the learner moves on from the pop up, they should be taken directly to the email screen that starts the Final Assessment (no return to the Main Menu)
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Topic 6-Final Assessment

Template	Show and tell
Page title	Inbox
Slide number	7_1
Dev notes	This appears as soon learner closes the previous popup

Title	Inbox
Text	Olivia finds an email from Geraldine in her inbox. Olivia, I am sure by now you have learned what you will need about competition law to lead this big project. You have all four badges to prove you've got the right stuff! So, just one more thing: time for the final assessment. Get a score of 80% or more and I'll meet you Monday morning with all the project details! Good luck, Geraldine
Graphic	Olivia is sitting with her laptop open and sees an email that has the text above. We can set it up however is easiest: Use the image to the right and put the email text in the text box on the left of the screen
Instruction text	Select the forward arrow to take the final assessment.

Template	Show and tell
Page title	Question 1
Slide number	7_2
Dev notes	Be sure the learner can click back to access this Show and Tell screen to see the question once they move to the multiple choice slide.

Title	Question 1
Text	In setting prices for a customer, you want to take into account: • pricing taken from competitor websites • a competitor price list • analyst publications of spot market trends.
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 1
Slide number	7_3
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 1
Question	Is this legal?
Instruction Text	Select your answer and then select Submit. Use the recap scenario button to review the question.

Answers	
Answer 1 text INCORRECT	Yes
Answer 2 text INCORRECT	No
Answer 3 text CORRECT	It requires further analysis, and first checking with your legal department

Good feedback	
Title	That's correct
Text	It is generally legal to use information from competitor websites and analyst publications. When using analyst publications, check the facts and be sure it doesn't reveal sensitive information. If you come across competitor pricing information, be sure to note when and where you received it. Don't accept competitor price lists from customers. This could be illegal. If you have any doubt, seek advice from your legal department.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	It is generally legal to use information from competitor websites and analyst publications. Information from competitor websites and analyst publications is generally legal to use. After this quiz, feel free to review the material in the course.
Graphic	A magnifying glass

Template	Show and tell
Page title	Question 2
Slide number	7_4
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 2
Text	The Hair Care Worldwide trade association health and safety committee issues a circular noting that new safety regulations require a change in the composition of certain shampoo grades and proceeds to set out a new pricing formula for shampoos that takes account of the more costly materials required.
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 2
Slide number	7_5
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 2
Question	Setting out this pricing formula is _____.
Instruction Text	Select your answer and then select Submit.

Answers	
Answer 1 text INCORRECT	legal
Answer 2 text CORRECT	illegal

Good feedback	
Title	That's correct
Text	When a trade association recommends a pricing formula (or any element of price) to its members who are competitors of each other, this is an illegal price fixing agreement. It does not matter if it relates to a price formula, a single element of price, or the final price. Trade associations cannot make recommendations to its members. Members of the association cannot make recommendations to one another.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	When a trade association recommends a pricing formula (or any element of price) to its members who are competitors of each other, this is an illegal price fixing agreement. It is considered an illegal price fixing agreement when a trade association recommends a price fixing formula to its members who are competitors of each other. After this quiz, feel free to review the material in the course.

Graphic	A magnifying glass
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Template	Show and tell
Page title	Question 3
Slide number	7_6
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 3
Text	You are a sales director for a XYZ dermatocosmetics brand. During an industry event, you agree with one of your main competitors that one of XYZ's brands will be removed from drugstores as long as a main competing brand will stay away from pharmacies.
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 3
Slide number	7_7
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 3
Question	Making this agreement is _____.
Instruction Text	Select your answer and then select Submit.

Answers	
Answer 1 text INCORRECT	legal
Answer 2 text CORRECT	illegal

Good feedback	
Title	That's correct
Text	Dividing the market based on the type of customers is a form of market allocation, which is strictly forbidden.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	Dividing the market based on the type of customers is a form of market allocation. One form of market allocation is dividing the market based on the type of customers. After this quiz, feel free to review the material in the course.
Graphic	A magnifying glass

Template	Show and tell
Page title	Question 4
Slide number	7_8
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 4
Text	When customer A complains about customer B's discounted prices, the appropriate response(s) is/are: I. to tell customer B to get in line with the recommended prices II. to tell customer A you will "sort out customer B" and speak firmly with customer B III. to tell customer A you will act, but in fact do nothing IV. to tell customer A you can recommend prices but not enforce them.
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 4
Slide number	7_9
Dev notes	

Title	Question 4
Question	Which are appropriate responses?
Instruction Text	Select your answer and then select Submit.

Answers	
Answer 1 text INCORRECT	I only
Answer 2 text CORRECT	IV only
Answer 3 text INCORRECT	III and IV only
Answer 4 text INCORRECT	All of I, II, III, and IV

Good feedback	
Title	That's correct
Text	In most countries it is illegal to tell customer B to stop discounting or threatening customer B in relation to its discounting. You should also avoid giving the impression to a customer that you will take action against another customer, even in vague terms. Even if you take no action, the first customer could write down that you promised to do so and this might be used as evidence against you.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	You should avoid giving the impression to a customer that you will take action against another customer, even in vague terms. You should avoid telling customers to stop discounting or threatening a customer in relation to its discounting. After this quiz, feel free to review the material in the course.

Graphic	A magnifying glass
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Template	Show and tell
Page title	Question 5
Slide number	7_10
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 5
Text	Evaluate the following statement: XYZ can make an agreement with customers about the prices they will charge as long as they agree to call the prices “recommended resale prices”.
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 5
Slide number	7_11
Dev notes	

Title	Question 5
Question	The statement made is _____.
Instruction Text	Select your answer and then select Submit.

Answers	
Answer 1 text INCORRECT	true
Answer 2 text CORRECT	false

Good feedback	
Title	That's correct
Text	A fixed resale price is not legal just because you call it "recommended". Recommended resale prices are legal only if they are genuine recommendations and the customer is free to choose to charge less. That is why it is advised to inform customers that they remain free to decide which retail prices they want to charge.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	Recommended resale prices are legal only if they are genuine recommendations and the customer is free to choose to charge less. You are advised to remind customers they are free to decide on the retail price they want to charge. After this quiz, feel free to review the material in the course.
Graphic	A magnifying glass

Template	Show and tell
Page title	Question 6
Slide number	7_12
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 6
Text	It is generally legal to charge different customers different prices. So is it a good idea to charge a customer who discounts heavily, and who shows that he can work on narrow margins, more than a customer who generally applies the recommended resale price?
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 6
Slide number	7_13
Dev notes	

Title	Question 6
Question	Is this a good idea?
Instruction Text	Select your answer and then select Submit.

Answers	
Answer 1 text INCORRECT	Yes
Answer 2 text CORRECT	No

Good feedback	
Title	That's correct
Text	Even if it is often legal to charge different prices, it is prohibited to charge higher prices to punish a customer for failing to apply the recommended resale prices.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	Even if it is often legal to charge different prices, higher pricing cannot be used against them. If a customer does not apply the recommended resale price, you cannot charge higher prices as a punishment. After this quiz, feel free to review the material in the course.
Graphic	A magnifying glass

Template	Show and tell
Page title	Question 7
Slide number	7_14
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 7
Text	As a purchase manager for XYZ's professional hair care brands, you are negotiating a supply deal with a counterparty, which is by far the main producer of a rare key raw material necessary in all hair color products. In exchange for a percentage of our future profits, he offers to grant XYZ unlimited worldwide exclusivity of supply.
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 7
Slide number	7_15
Dev notes	

Title	Question 7
Question	Is this agreement legal?
Instruction Text	Select your answer and then select Submit.

Answers	
Answer 1 text INCORRECT	Yes
Answer 2 text INCORRECT	No
Answer 3 text CORRECT	It requires further analysis

Good feedback	
Title	That's correct
Text	Exclusivity agreements can be legal in certain circumstances. However, an exclusivity clause benefiting a company with high market shares is very likely to be considered illegal, as it may close out competitors. This is why a case-by-case analysis by your legal department should be required in any case.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	An exclusivity clause benefiting a company with high market shares is very likely to be considered illegal, as it may close out competitors. If a company has high market shares, it is likely considered illegal to offer an exclusivity clause that would benefit them. After this quiz, feel free to review the material in the course.
Graphic	A magnifying glass

Template	Show and tell
Page title	Question 8
Slide number	7_16
Dev notes	Be sure the learner can click back to access the question once they move to the multiple choice slide.

Title	Question 8
Text	As an HR manager for XYZ, you attend an HR workshop at a large international tech event. When discussing with other HR managers from various industries, you notice that most companies struggle at the moment to recruit data scientists. At some point during the event, the HR manager of a big industrial group comes to you and offers to refrain from poaching XYZ's data scientists, in exchange for a similar commitment from you.
Graphic	
Instruction text	Select the forward arrow to continue.

Template	Multiple choice
Page title	Question 8
Slide number	7_17
Dev notes	

Title	Question 8
Question	Making such an agreement is _____.
Instruction Text	Select your answer and then select Submit.

Answers	
Answer 1 text INCORRECT	legal
Answer 2 text CORRECT	illegal

Good feedback	
Title	That's correct
Text	Most competition law authorities in the world have started to address “no-poach agreements”—agreements between companies not to poach each other’s employees—as illegal collusions. The fact that the companies entering such agreements are not competitors is irrelevant because all companies are competing when hiring employees. Companies also cannot enter into agreements to fix employees’ wages.
Graphic	A tick.

Less good feedback	
Title	Let's review
Text	Most competition law authorities in the world have started to address “no-poach agreements”—agreements between companies not to poach each other’s employees—as illegal collusions. “No-poach agreements” are mostly considered illegal collusions by competition law authorities around the world. After this quiz, feel free to review the material in the course.

Graphic	A magnifying glass
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Template	Assessment feedback
Page title	Completed!
Slide number	7_18
Dev notes	2 links: 1st Embedded link will need to be to the completion certificate PDF 2nd link will be for a summary PDF If the learner does not get at least 6 out of 8 questions correct, they will need to “review” the course and have another opportunity to retake the final assessment. The health gauge will increase 5% for each question they get correct and stay in place if one is missed.

Pass	
Title	Well done, you passed!
Subtitle	Olivia will be leading the next project!
Text	Competition law guides the work of XYZ on a day-to-day basis. Knowing the regulations prevents violations and penalties. Always reach out to your Legal department with questions. Here is your completion <u>certificate</u>. Here is <u>a summary of what was learned in this course</u>.
Instruction text	Select the Menu button to return to the main menu, or Exit to leave the course.

Fail	
Title	You didn't pass
Subtitle	Let's try again.
Text	The course is available to review. Once you have reviewed the course, you can try the quiz again.
Instruction text	Select the Menu button to return to the main menu and retake this assessment.

A PDF that summarizes the course will be available for download

A PDF that serves as a completion certificate will also be available for download