

# The British Blockchain Association

## Competition Law and Antitrust Policy

Version 1.0 | Approved 26 September 2026

| Item                          | Detail                                                                                |
|-------------------------------|---------------------------------------------------------------------------------------|
| Version                       | 1.0                                                                                   |
| Approved by                   | Board of Directors of The British Blockchain Association                              |
| Date of approval and effect   | 26 September 2026                                                                     |
| Responsible officer           | Secretary and Executive Director                                                      |
| Reporting contact             | secretary@britishblockchainassociation.org                                            |
| Next review                   | By 26 September 2027                                                                  |
| Alternative reporting contact | Dr Mureed Hussain FBBA, Executive Director<br>mureed@britishblockchainassociation.org |

### 1. Our commitment

The British Blockchain Association (BBA) supports research, education, informed policy debate and responsible collaboration across the blockchain ecosystem. All of this work must respect competition law and the right of every participant to make its own commercial decisions.

The BBA will not organise, encourage or facilitate anti-competitive conduct. This policy protects the integrity of BBA activities and helps participants recognise and deal with competition risk. It does not replace the law, or specific legal advice on a particular situation.

### 2. Why this matters

Breaches of competition law carry serious consequences for organisations and for individuals:

- Businesses can be fined up to 10% of their worldwide turnover.
- Individuals involved in cartel conduct can face criminal prosecution, and company directors can be disqualified.
- Infringing agreements are unenforceable, and those harmed can claim damages.

Trade associations carry particular risk. Competition law applies to decisions and recommendations of associations as well as to agreements between businesses. A BBA recommendation, rule or scheme could therefore itself amount to an infringement.

### 3. Who and what this policy covers

This policy applies to everyone who takes part in or organises BBA activities. That includes members, directors, officers, staff, volunteers, speakers, sponsors, working-group participants and guests.

It covers meetings, conferences, roundtables, committees, working groups, research collaborations, consultations and BBA-managed digital channels. It also covers informal conversations, messages and social gatherings connected with those activities. An understanding can breach competition law whether it is written, spoken, informal or simply acted upon.

UK competition law can apply to conduct outside the UK where it affects UK markets. BBA activities involving other countries may also be subject to their competition rules, including EU law. Where there is any doubt, pause the activity and seek legal advice.

#### **4. Independent commercial decisions**

Every participant must make its own decisions on prices, fees, discounts, customers, suppliers, recruitment, pay and commercial strategy.

BBA activities must never be used to agree or coordinate:

- Prices, fees, margins, discounts or other trading terms.
- Bids, tender outcomes or decisions about whether to bid.
- The allocation of customers, suppliers, territories or markets.
- Limits on output, supply, investment or innovation.
- Collective boycotts, or the exclusion of a business from a market.
- Pay levels, or agreements between employers not to recruit or approach each other's staff.

The BBA will not recommend the prices or fees that members charge. Decisions about the BBA's own services will not be used as a means of coordinating members' commercial conduct.

#### **5. Commercially sensitive information**

Participants must not use BBA activities to share non-public, competitively sensitive information with actual or potential competitors. This applies whether the information passes directly or through the BBA or any other intermediary.

Sensitive information includes current or future pricing, individual customer terms, confidential costs or margins, planned bids, output plans, detailed commercial forecasts, and recruitment or pay plans.

Public, historical or aggregated information is not automatically safe. Its age, level of detail, market context and whether individual businesses can be identified all matter.

The BBA will carry out a competition-risk assessment before collecting or circulating any member survey, benchmarking exercise or commercial dataset, and will take legal advice where needed. Benchmarking data should normally be collected and aggregated by an independent third party, so that no individual business's figures can be identified.

#### **6. Meetings and events**

For any meeting involving businesses that compete, organisers will circulate an agenda in advance and flag any potentially sensitive topics. Chairs will open with a short competition-law reminder and keep discussion to the agreed agenda. Agendas and minutes will be kept, and minutes will be reviewed before circulation to ensure they record substantive decisions and any competition concerns raised.

If an inappropriate discussion begins:

1. Object clearly and ask for it to stop.
2. The chair will stop the discussion and record the concern and the action taken.
3. If the discussion continues, leave the meeting or channel, and make sure your objection and departure are recorded.
4. Report the concern promptly to the Secretary and Executive Director (section 10). You may also report directly to the Competition and Markets Authority (CMA).

Do not continue a prohibited discussion privately, during a break or in a separate messaging group. If you receive sensitive information unexpectedly, do not use it or reciprocate. Stop and seek advice.

## 7. Research, policy and technical collaboration

Evidence-based research, education, public-policy engagement and technical discussion are central to the BBA's purpose. They must not become a vehicle for coordinating competitive behaviour.

Joint submissions to government, Parliament and regulators on legitimate policy questions are appropriate and encouraged. Any necessary confidential commercial input must be handled through an appropriately controlled process, with legal advice where required, rather than shared between competing participants.

Research collaborations, technical standards, shared infrastructure and intellectual-property arrangements that could affect competition will be assessed before any commitments are made.

Taking part in a BBA initiative does not authorise any restriction of competition. Nor does it mean the BBA has approved, legally or otherwise, any participant's commercial arrangements.

## 8. Blockchain-specific risks

Blockchain technology creates some competition risks that participants may not immediately recognise. Take particular care with:

- **Shared ledgers and consortium networks.** A shared ledger must not become a channel for competitors to see or exchange each other's sensitive commercial data. Access rights and data visibility should be designed with this in mind.
- **Network access and interoperability.** Rules for joining or connecting to a network or protocol should be objective, transparent and non-discriminatory. They must not be used to exclude competitors without justification.
- **Protocol, token and network governance.** Coordination between competitors on fees, validation, transaction ordering or network rules can raise the same concerns as any other agreement between competitors.
- **Algorithms and smart contracts.** Automated pricing or execution tools, including tools supplied by a common provider, can facilitate anti-competitive coordination. Similar or coordinated outcomes do not, by themselves, establish an unlawful agreement. Whether conduct amounts to an agreement or concerted practice requires assessment of the facts. Businesses must not use technology to implement or facilitate prohibited conduct and should seek legal advice where concerns arise.

If you are unsure whether an arrangement raises these issues, raise it before commitments are made.

## **9. Standards, recognition and fair participation**

BBA membership and participation criteria will be objective, transparent, proportionate and non-discriminatory. They will not be used to protect existing members from competition or to exclude competitors arbitrarily.

Any BBA standard, recognition, certification or assessment scheme will:

- Use published, objective and relevant criteria.
- Be open to any organisation that meets those criteria.
- Ensure participation is voluntary, and that non-participation is not used to impose unjustified restrictions on competition.
- Make any resulting standard available on fair, reasonable and non-discriminatory terms.

Members remain free to compete independently and to join other lawful associations and initiatives.

## **10. Raising and responding to concerns**

Raise any concern promptly with the Secretary and Executive Director, Noor Naqvi, at [secretary@britishblockchainassociation.org](mailto:secretary@britishblockchainassociation.org).

If the concern involves the Secretary and Executive Director, raise it directly with Dr Mureed Hussain FBBA, Executive Director, at [mureed@britishblockchainassociation.org](mailto:mureed@britishblockchainassociation.org). If Dr Hussain is also involved in the concern, raise it directly with another uninvolved Director, or in writing to the Board of Directors at the BBA's registered office. Do not send sensitive details to a shared mailbox if the person concerned may have access. You are also free to contact the CMA directly at any time.

Preserve relevant messages, documents and meeting records. Do not delete or alter them, and do not share sensitive material more widely than is needed to report and assess the concern.

The BBA will limit access to reports to those who need to assess or act on them, subject to its legal obligations. Complete confidentiality cannot be guaranteed. The BBA will not tolerate retaliation against anyone who raises a genuine concern honestly, even if it is not subsequently substantiated.

The BBA may pause an activity, stop a discussion or remove a participant from a meeting to deal with an immediate concern. Any further action will be proportionate, follow the BBA's membership rules and fair procedures, and be informed by legal advice where needed. A suspected breach will not be treated as established until it has been properly assessed.

## **11. Records and data protection**

Meeting records, reports and preserved communications may contain personal data. The BBA will handle them in line with UK data protection law and its privacy notice, and keep them only for as long as necessary.

## 12. Implementation and review

The BBA will make this policy available to members and participants, brief staff and meeting chairs, and include the reminder below in agendas and event materials. References to the policy will be included in membership terms and relevant meeting documents.

The Board of Directors will review this policy at least once a year, and sooner after any significant legal or operational change.

### Meeting reminder

*BBA activities must comply with competition law. Please make commercial decisions independently and do not discuss confidential pricing, bids, customers, market allocation, pay arrangements or other competitively sensitive information. If a concern arises, stop the discussion and notify the chair. This applies equally to informal conversations and associated online channels.*