

September 2021

UK Competition Law Newsletter

Highlights

- The UK Office For The Internal Market is Officially Launched
- CAT Awards Opt-Out Collective Proceedings Order Against BT
- CMA Publishes Provisional Findings in relation to JD Sports Fashion Plc's Acquisition of Footasylum Plc

The UK Office For The Internal Market Is Officially Launched

In September 2021, the UK Competition and Markets Authority (**CMA**) announced the official launch of the Office for the Internal Market (**OIM**), a new unit within the CMA intended to support the effective operation of the UK internal market through monitoring, publishing reports and advice, and making recommendations to the Government. This article examines (i) what the OIM does and why it was introduced; (ii) how the OIM proposes to carry out its functions; (iii) the OIM's information gathering powers; and (iv) broader implications for UK competition policy.

The UK Internal Market Act 2020

When the UK was a member of the EU, it was subject to uniform rules and regulations that applied to products and services across the

EU single market. This in turn ensured that uniform rules applied across the whole of the UK. Following Brexit, EU law no longer prevents the devolved administrations or national authorities in Scotland, Wales, and Northern Ireland (other than goods that fall within the scope of the Northern Ireland Protocol) from legislating or implementing rules and regulations that have the potential to affect trade within the UK.¹

To address this concern, the UK Government introduced the UK Internal Market Act (the **UKIMA**). The Act is intended to ensure “*the continued seamless functioning of the UK Internal Market*” and that “*the rules governing the production and sale of goods and services in one part of the UK are recognised as being as good as the rules in any other part of the UK.*”² It enshrines in law the principles of:

¹ Relevant national authorities are: (a) the Secretary of State; (b) the Scottish Ministers; (c) the Welsh Ministers; (d) a Northern Ireland department.

² Department for Business, Energy & Industrial Strategy, UK Internal Market Policy Paper (July 2020).

- **Mutual recognition:** if a good complies with requirements in one part of the UK where it was produced or imported, it can be sold in another part of the UK without having to comply with any additional local the requirements, and
- **Non-discrimination:** a requirement will have no effect to the extent it directly or indirectly discriminates against goods connected to another part of the UK.

The UKIMA in effect creates a “lowest common denominator” approach to trade regulation between the four constituent nations of the UK. With limited exceptions, and in the absence of a common framework agreement,³ a national authority cannot impose a higher regulatory burden on goods imported from another UK nation. Common framework agreements have so far been provisionally approved in relation to matters such as driving licences, rail technical standards, motor insurance, and nutrition labelling.⁴

The Role of the OIM

The UKIMA provides for the OIM to be established within the CMA. Its overarching objective is “*to support, through the application of economic and other technical expertise, the effective operation of the internal market in the United Kingdom.*”⁵ Its functions include monitoring and reporting on the operation of the UK internal market,⁶ as well as providing reports and advice on the effect of specific regulatory provisions in response to requests from the UK or a devolved government. The OIM is headed by a Senior Director, Rachel Merelie, who previously held a number of senior roles within the CMA. She oversees a team with delivery, economic, legal,

and business advisory functions located across the CMA’s offices in London, Belfast, Cardiff, and Edinburgh. The UKIMA also establishes the OIM panel within the CMA, consisting of a panel chair, who will sit on the CMA Board, and a number of panel members. OIM panel members are expected to be appointed by April 2022.

When carrying out its functions, the OIM must have regard to its objective to support the effective operation of the UK internal market and the need to act even-handedly in relation to the relevant national authorities. Crucially, the OIM’s role is advisory rather than decision-making.

In addition to its functions under the UKIMA, the OIM is tasked with setting up a “Subsidy Advice Unit” to receive notifications of subsidies from public authorities, including devolved administrations and local authorities, under the Subsidy Control Bill (as and when it passes into law). The Subsidy Control Bill – the UK’s equivalent of a state aid regime – establishes “*subsidies of interest*” and “*subsidies of particular interest*” that can be referred to the Subsidy Advice Unit on a mandatory or voluntary basis. The OIM anticipates reviewing between 10 and 40 subsidies per annum.⁷

In September 2021, the OIM published two guidance documents setting out how it proposes to carry out its functions under the UKIMA: (i) Guidance on the operation of the OIM,⁸ including the analytical approach it will adopt and the prioritisation principles it will use when it decides which work to undertake pursuant to the UKIMA (the **OIM Guidance**), and (ii) a Statement of Policy on the enforcement of its information-gathering powers (the **OIM Statement of Policy**).⁹

³ Common framework agreements are defined as agreements between the UK and a devolved government as to how “devolved or transferred matters previously governed by EU laws are to be regulated after [31 December 2020].” See UK Internal Market Act, s.18(4).

⁴ Cabinet Office, UK Common Frameworks, <https://www.gov.uk/government/collections/uk-common-frameworks>.

⁵ UKIMA, s.31(2).

⁶ UKIMA, s. 33.

⁷ Mlex, [UK CMA expects Subsidy Advice Unit to receive up to 40 references a year, exec says](#) (October 27, 2021).

⁸ See OIM, Guidance on the Operation of the CMA’s UK Internal Market Functions, OIM1 (21 September 2021).

⁹ OIM, Statement of Policy on the Enforcement of the OIM’s Information Gathering Powers, OIM2 (21 September 2021). The OIM is required to publish this Statement of Policy under UK Internal Market Act, s. 42.

Analytical Approach

The OIM's analytical approach will focus on the impact of divergent regulatory approaches on the effective operation of the UK internal market, including (i) minimising barriers to trade, investment, and the movement of labour between all parts of the UK, (ii) ensuring that businesses or consumers in one part of the UK are not favoured over others, and (iii) effective management of regulatory divergence (including through the use of common framework agreements).¹⁰ The OIM will use the following tools to analyse the impact of divergent regulatory approaches on the UK internal market.¹¹

- **Monitoring.** The OIM will gather information on relevant developments by (i) undertaking market monitoring activities; (ii) developing toolkits and processes to understand the evolution of regulatory regimes across the UK; (iii) launching an Online Gateway to gather evidence from consumers, suppliers and producers; and (iv) gathering intelligence from other sources (*e.g.*, routine stakeholder interaction).
- **Evidence gathering.** The OIM will use its monitoring processes to gather evidence on the volume and nature of regulations that are introduced, regulatory complexity and divergence, measures of intra-UK trade, and other areas of potential relevance, such as investment flows, industry structure, labour markets, and consumer outcomes.
- **Mandatory reporting and discretionary reviews.** The OIM will produce annual and five-yearly reports on the operation of the internal market in the UK and relevant

developments. The five-yearly reports must also cover common framework agreements. The OIM must arrange for a copy of its annual and five-yearly reports to be laid before both UK Houses of Parliament, the Scottish Parliament, the Welsh Senedd, and the Northern Irish Assembly.¹² The OIM's first annual 'State of the UK Internal Market' report is expected to be published in spring 2022. In addition, the OIM can undertake discretionary reviews on any matter it considers relevant to assess the effective operation of the UK internal market and UK market access for goods, services, and professional qualifications.¹³

— Advice on specific regulatory provisions.

On request from the UK or a devolved government (*i.e.*, the UK Government, the Scottish Government, the Welsh Government and a Northern Ireland Department), the OIM will provide advice or reports on proposed or passed regulatory provisions¹⁴ and their potential economic effects on the operation of the UK internal market.¹⁵

In carrying out this function, the OIM will examine the nature of the regulatory provision and affected products, the extent of affected intra-UK trade, cost changes or other trade impacts, likely responses by suppliers, the wider set of products, suppliers, and/or geographic areas which may be affected due to demand-side or supply-side substitution, and the cumulative or indirect effects of the regulatory divergences. The OIM will gather evidence from the relevant national authority, suppliers whose businesses are affected by the regulation, customers, trade associations, business and consumer organisations, government bodies, regulators, and other interested and informed third parties.

¹⁰ OIM Guidance, para. 3.2.

¹¹ See further OIM Guidance, paras. 3.8 to 3.36.

¹² UKIMA, s.33(7).

¹³ UKIMA, s. 33(1).

¹⁴ A "regulatory provision" is defined in Part 4 of the UK Internal Market Act as a provision contained in legislation or a provision not of a legislative character but made under, and given effect by, legislation (but excluding a provision so far as it contains anything that is necessary to give effect to the Northern Ireland Protocol).

¹⁵ UK Internal Market Act, ss. 34 to 36.

The OIM must publish reports,¹⁶ but need not publish advice. Advice given by the OIM at the request of one or more national authority must, however, be shared with the other national authorities.¹⁷ Reports and advice are not binding on the national authority that requests them but must be shared with other national authorities and/or laid before the UK and national parliaments.

Prioritisation Principles

The OIM states that it will use the following principles to “*inform decisions about what discretionary work the OIM will carry out, in particular should there be significant numbers of proposals for the OIM to undertake discretionary reviews and reports or requests for reports or advice on specific regulatory provisions (on request from relevant national authorities), and to inform decisions about intelligence or information identified by the OIM through its own monitoring activity*”:¹⁸

- **The matter’s significance**, including its relevance, appropriateness, timeliness, novelty and contribution to knowledge growth, as well as considering whether it would foster or facilitate new partnership approaches between relevant authorities and whether it could assist relevant authorities to prevent or mitigate future impacts on the internal market.
- **The potential impact of the matter** on consumers, enterprises, trade, investment, and general economic efficiency. The OIM will also consider whether it is acting in the “*least intrusive way necessary to achieve its aims and objectives, consummate with its statutory duties*.”
- **Even-handedness**. The OIM will consider how the matter “*contributes to a fair and balanced programme of work across the four nations and across the internal market generally*.”

- **Resources**. The OIM will have regard to the resource implications of any proposal, including whether the benefits from doing the work justify the resource requirements.

Information Gathering

The OIM can use information-gathering powers to fulfil its reporting, advisory, and monitoring functions. The OIM considers the provision of “*timely, complete and accurate information*” to be “*critical to the OIM’s effectiveness and ability to fulfil its functions*.”¹⁹ The OIM’s information gathering may in practice include informal requests, invitations to meetings or calls, and compulsory requests to any person under section 41 of the UKIMA (**‘Section 41 Notices’**).²⁰

The OIM states that Section 41 Notices are most likely to be used where the OIM considers it necessary to obtain information that is “*essential for its advice and/or reports and that could not be obtained in a timely manner through other means*.”²¹ The process of the OIM issuing Section 41 Notices largely mirrors CMA information requests in the context of merger, antitrust, and market investigations. In particular, addressees will normally be invited to comment on a draft request; the request will set out its purpose, how it relates to the OIM’s functions, the information and/or documents the OIM requires, and the consequences for failure to comply with the request; and the OIM will seek to set a reasonable deadline for all Section 41 Notices.

Given the “*importance of information to the OIM’s reporting, advisory and monitoring functions*,”²² the OIM can under section 43 of the UKIMA impose penalties on persons who fail to comply with a Section 41 Notice without reasonable excuse. The OIM can impose both a single fixed amount, a daily rate, or both, depending on the circumstances. The maximum fines that the OIM

¹⁶ UKIMA, s. 34(10).

¹⁷ UKIMA, s. 34(9).

¹⁸ OIM Guidance, para. 4.2 ff.

¹⁹ OIM Statement of Policy, para. 3.2.

²⁰ UK Internal Market Act, s. 41. OIM Guidance, paras. 2.40 to 15.

²¹ OIM Statement of Policy, para. 3.5.

²² OIM Statement of Policy, para. 3.15.

can currently impose are a £30,000 fixed amount and a £15,000 daily rate (or a mixture of the two). These limits are the same as the limits that apply to the CMA in relation to information gathering under the Competition Act.²³

Penalties imposed under section 43 of the UKIMA for failure to comply with a Section 41 Notice are appealable to the Competition Appeal Tribunal.

Interaction with the Northern Ireland Protocol

The UKIMA applies to Northern Ireland in respect of services as it does to England, Scotland, and Wales. Goods in Northern Ireland are, however, subject to the Northern Ireland Protocol to the UK-EU Withdrawal Agreement that entered into force in January 2020. The Protocol effectively created a regulatory and customs border between Great Britain and Northern Ireland in respect of goods. As such, the UKIMA excludes from the definition of a “*regulatory provision*” anything that is necessary to give effect to the Northern Ireland Protocol.²⁴ The OIM’s mandate to monitor and report and advise on the operation of the UK internal market therefore does not apply to goods covered by the Northern Ireland Protocol. The OIM will not, for example, review the impact of the Northern Ireland Protocol (or legislation necessary to implement it) on the operation of the UK internal market as part of its annual and five-yearly reports or discretionary reviews.²⁵

Comment

The UKIMA was controversial when it was introduced and failed to achieve support from the Welsh Senedd or Scottish Parliament.²⁶ Their main objection was that the market-access principle applied in the absence of a common framework agreement on how devolved or transferred matters previously governed by EU laws should be regulated, and there is no obligation on the UK government under the UKIMA to introduce a common framework agreement.²⁷ The Scottish Government criticised the UKIMA as “*based on unilateral decision-making and imposition, with no minimum standards or guarantees [and which] creates a power for UK Ministers to alter what is in or out of the scope of the Act unilaterally (for example, health services are currently excluded), without the consent of devolved administrations.*”²⁸

The OIM will nevertheless have to work with the devolved administrations and will be required to challenge measures that fail to observe the principles of mutual recognition and non-discrimination. Placing responsibility on the CMA to carry out this assessment suggests that the UK Government is alert to these political tensions and is keen to ensure that the OIM’s recommendations are based on an objective assessment conducted by an independent agency insulated from political pressures. It also suggests that the OIM will rely on established economic principles and the expertise of the CMA when analysing the effects on trade and any market distortions arising from regulatory measures.

²³ Competition and Markets Authority (Penalties) Order 2014.

²⁴ UK Internal Market Act, ss. 30(8) to (9).

²⁵ OIM Guidance, para. 2.13.

²⁶ See further Stephen Weatherill, Will The United Kingdom Survive The United Kingdom Internal Market Act? (UKICE working paper, March 2021).

²⁷ Ibid.

²⁸ Scottish Government, [After Brexit: The UK Internal Market Act and devolution](#) (March 8, 2021).

Judgments, Decisions and Other News

Court Judgments And Litigation

Justin Le Patourel v BT Group PLC. On 27 September 2021, the CAT issued its judgment on an application by the proposed Class Representative Mr Le Patourel, for a Collective Proceedings Order (**CPO**), and an application by BT (a) to strike out the claim pursuant to Rule 41(1) (b) of The Competition Appeal Tribunal Rules 2015 (**the Rules**) on the basis that there were no reasonable grounds for making it and/or (b) for summary judgment to dismiss the claim pursuant to Rule 43(1)(a) of the Rules on the basis that it had no real prospect of success. The case concerns a claim that BT abused its dominant position in two telecommunications markets by imposing unfair prices, contrary to section 18 of the Competition Act 1998 (**CA98**). Mr Le Patourel brought the claim in respect of approximately 2.3 million affected BT customers. Subject to the question of merits, BT did not resist the making of a CPO on an “opt-in” basis but did oppose the making of an “opt-out” CPO. The CAT did not accept BT’s application on either ground, deciding that an opt-out CPO should be granted.

Forrest Fresh Foods Limited v Coca-Cola European Partners Great Britain Limited. On 7 September 2021 the CAT issued a judgment striking out Forrest Fresh Foods’ claim against Coca-Cola European Partners Great Britain Limited alleging that Coca-Cola had abused its dominant position in the “*market for the wholesale supply of soft drinks within the European Market*” in breach of the Chapter 2 prohibition in the CA98. The CAT held that Forrest Fresh Food had made “*no attempt to amend its Particulars of Claim to set out a coherent and intelligible claim,*” and responded to the application at the hearing “*with nothing more than vague and unspecific suggestions that further particulars might be provided if ordered to do so.*”

Elizabeth Helen Coll v Alphabet Inc. and Others. On 13 September 2021, the CAT published an application to commence collective proceedings under section 47B of the CA98 against Google alleging that it has abused dominant positions in breach of Article 102 of the Treaty on the Functioning of the European Union (**TFEU**) and the Chapter 2 Prohibition of the Competition Act. The claims relate to an alleged abuse of dominance in relation to the licensing of smart mobile operating systems, the distribution of Android apps to Android device users, and the provision of payment processing services. The applicant has applied for a CPO permitting it to act as the class representative bringing opt-out collective proceedings on behalf of UK domiciled members of the proposed class and on an opt-in basis for non-UK domiciled members of the proposed class. The proposed class consists of all users of certain Android devices who, between 1 October 2015 and the date of final judgment or earlier settlement, used the UK version of the Play Store and made one or more relevant purchases.

American Golf (Trading) Ltd. and ors. v. Mastercard Inc. and others. Four divisions of Mastercard are facing a UK claim from retailers AGDC Realisations, American Golf, and Victoria Plum, which has been filed in the Commercial Court of the High Court in London. This action is one of several actions against Mastercard relating to a European Commission decision in 2007 finding that certain multilateral interchange fees within the Mastercard payment scheme infringed Article 101 TFEU. The claim reference is CL-2021-000513.

Antitrust/Market Studies

Funerals Market Investigation. On 16 September 2021, the CMA [published](#) its Funerals Market Investigation Order 2021,²⁹ which introduces new obligations intended to assist funeral directors and crematorium operators to support their customers to arrange funerals that meet their needs and budget. The Order includes requirements for funeral directors to provide standardised price lists and other commercial information to customers, and places restrictions on funeral directors making payments to incentivise hospitals, hospices, care homes, and other similar institutions for referring customers to them. This Order follows the CMA's Final Report in its Funerals Market Investigation, published on 19 December 2020.

Market Study into Children's Social Care Provision. On 9 September 2021, the CMA [decided](#) not to make a market investigation reference in relation to the provision of children's social care services, following its market study into children's social care provision. No representations had been made to the CMA within the specified period indicating that a reference should be made. The CMA published an interim report in its market study in October 2021.

CMA Investigates Sale of Leicester City FC-Branded Products and Merchandise. On 23 September 2021, the CMA [launched](#) an investigation into suspected breaches of UK competition law by Leicester City Football Club Limited and JD Sports Fashion Plc. The investigation concerns suspected infringements of Chapter 1 of the CA98 in relation to the sale of Leicester City-branded products and merchandise in the United Kingdom.

Merger Developments

PHASE 2 INVESTIGATIONS

CMA Publishes Provisional Findings in relation to JD Sports Fashion Plc's Acquisition of Footasylum Plc. On 3 September 2021, the CMA [published](#) its provisional findings in its remitted Phase 2 investigation into JD Sports' acquisition of Footasylum, finding that the acquisition has or may be expected to result in a substantial lessening of competition (SLC) in the retail supply of sports-inspired casual footwear and apparel products sold online and in store. The CMA also [published](#) a remedies paper setting out its provisional decision that a divestiture would be the only effective remedy available to address the SLC. The CMA's investigation follows a [remittal](#) to the CMA by the CAT, which quashed the CMA's original decision to prohibit the transaction insofar as its conclusion was based on an assessment of the likely effects of the COVID-19 pandemic.³⁰

CMA Refers Sony Music Entertainment/AWAL and Kobalt Neighbouring Rights Businesses Merger for Phase 2 Investigation. On 10 September 2021, the CMA [announced](#) its decision to refer the completed acquisition of AWAL and Kobalt Neighbouring Rights business by Sony Music Entertainment for a Phase 2 investigation. As part of its Phase 2 investigation, the CMA will examine whether the merger has resulted, or may be expected to result, in a SLC within a market or markets in the UK for goods or services, including the wholesale digital distribution of recorded music in the UK.

²⁹ For further information, see [Cleary Gottlieb, UK Competition Newsletter](#), June 2021.

³⁰ For further information, see [Cleary Gottlieb, UK Competition Newsletter](#), November 2020.

UNDERTAKINGS IN LIEU OF PHASE 2 INVESTIGATIONS

CMA Closes Case On Viagogo/Stubhub Merger After Divestment Completed. On 8 September 2021, the CMA [published](#) a case closure summary in relation to the completed acquisition by PUG LLC (**Viagogo**) of the StubHub business of eBay Inc., following completion of the divestment required by the CMA following its Phase 2 investigation into the merger.³¹ The CMA required viagogo to sell StubHub's business outside North America to an independent third party. The purchase of the divestment business by Digital Fuel LLC was approved by the CMA and completed on 3 September 2021.

PHASE 1 INVESTIGATIONS

National Grid Holdings One Plc/PLL WPD Investments Limited. On 1 September 2021, the CMA [announced](#) that it had cleared the acquisition of PPL WPD Investments by National Grid Holdings.

Glennon Brothers UK Holdings Limited/Balcas Limited. On 9 September 2021, the CMA [announced](#) that it had cleared the anticipated acquisition of Balcas by Glennon Brothers.

Facebook, Inc./Kustomer, Inc. On 27 September 2021, the CMA [announced](#) that it had cleared the acquisition by Facebook of Kustomer.

Auction Technology Group/Live Auctioneers, LLC. On 29 September 2021, the CMA [announced](#) that it had cleared the anticipated acquisition by Auction Technology Group plc of Live Auctioneers, LLC.

ONGOING PHASE 1 INVESTIGATIONS

Parties	Decision Due Date
Pennon Group plc / Bristol Water Holdings UK Limited	12 November 2021
CHC/Babcock merger inquiry	18 November 2021
Admiral Taverns/Hampden Pub Estate	2 December 2021
Dye & Durham (UK) Limited/ TM Group (UK) Limited	9 December 2021
Veolia/Suez	7 December 2021
Taurus International Ltd and Others/Perpetuus (public interest intervention)	7 February 2022 (deadline to report to Secretary of State)
CVS/Quality Pet Care	TBC
Nijjar Group Holdings (Acton) Limited/Medina Holdings	TBC
Cobham Ultra Acquisitions Limited/Ultra Electronics Holdings Plc (public interest intervention)	TBC

Other Developments

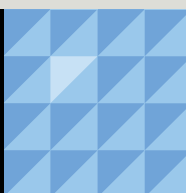
Competition Law Rules Suspended To Allow Oil Firms To Cooperate To Deliver Fuel To Empty Petrol Stations. On 26 September 2021, the Department for Business, Energy and Industrial Strategy [announced](#) that, due to supply chain issues at petrol forecourts, the Secretary of State had agreed temporarily to exempt the fuel supply industry from the CA98 in order to allow companies to share information, minimise further disruption, and prioritise parts of the country most in need. Under Schedule 3 of the CA98, the Secretary of State may order that the Chapter 1 prohibition should not apply to agreements of a particular description if there are exceptional and compelling public policy reasons to do so.

³¹ For further information, see [Cleary Gottlieb, UK Competition Newsletter](#), February 2021.

CMA Appoints Second Deputy Chief Economic Adviser. On 24 September 2021, the CMA announced the promotion of Dr Jenny Haydock, currently an Economics Director at the CMA, to Deputy Chief Economic Adviser. The CMA noted that the expansion of its senior economics team was driven by its increased workload as a result of Brexit and the creation of the Office for the Internal Market and Digital Markets Unit.

CMA Consults On Environmental Sustainability Advice. On 19 July 2021, the Secretary of State for Business, Energy and Industrial Strategy commissioned the CMA to provide advice on how the competition and consumer regimes could better support the UK's net zero and environmental sustainability goals (including climate adaptation). On 29 September 2021, the CMA launched a call for input to inform the advice the CMA will provide to the government on how competition and consumer regimes could better support these sustainability goals.

Antitrust Watch
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Cleary Antitrust Watch Blog
Coming December 2021

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