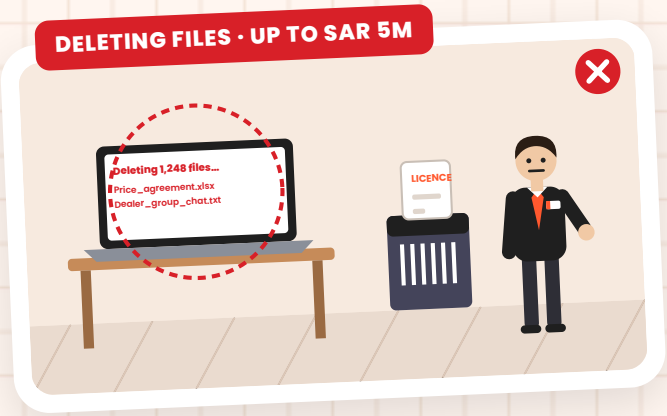
autosmart

Edition 1 · Kingdom of Saudi Arabia · 2026

• CRITICAL EXPOSURE Automotive dealerships, distributors & parts businesses

Competition Law Compliance Guidebook for Automotive Companies

Dawn-raid readiness and cartel risk, standard by standard: what GAC does when it arrives unannounced, what good looks like, **and what one wrong move can cost.**





10% of sales

or up to SAR 10M, or 3× the gains, for **price-fixing, market sharing** or abuse of dominance.

SAR 5M

or 5% of annual sales for **obstructing a dawn raid**: refusing entry, hiding or deleting files.

43

car agents and distributors referred by GAC for criminal lawsuits after investigations into parts and after-sales.

17 standards · Before · during · after a raid · Right way / wrong way · Real enforcement cases · Ideal fix time

2022 43 car agents referred → **Aug 2023** Auto sector study → **Dec 2023** 64 firms to court → **Dec 2025** SAR 36.9M, 13 firms → **The next raid could be at your dealership.**

WHY THIS GUIDEBOOK EXISTS

GAC doesn't make appointments. It arrives at 8 am.

The General Authority for Competition can walk into a dealership unannounced, search offices, laptops and phones, and copy or take documents. It has already looked hard at the car sector: a study of the **whole automotive supply chain** in 2023, and criminal lawsuits against **dozens of car agents, distributors and parts businesses**.

What staff do in the first 30 minutes decides whether an inspection stays an inspection, or becomes **a second case for obstruction**. This guidebook turns the dawn-raid checklist into a shared picture of what good looks like, and what failure costs.

01

Be ready before they arrive

Procedures, named contacts, signs at the gate and trained staff, so nobody improvises when officers are at reception.

02

Behave correctly during the raid

Cooperate, don't delete, don't guess, and keep a copy of everything GAC takes.

03

See the price of every mistake

Every page shows the fine, what else can happen, and a real Saudi enforcement case.

04

Find cartel risk first

A self-assessment catches price-fixing and territory deals before an inspector does.

THE DAWN RAID, STEP BY STEP, AND THE STANDARDS THAT COVER EACH STEP

1 **Before**
Be ready
CMP 001 · 002 · 003 · 004 · 006 · 008 · 009 · 016 · 017

2 **Arrival**
First 30 minutes
CMP 003 · 004 · 005

3 **Search**
Offices, laptops, phones
CMP 010 · 011 · 014 · 015 · 016

4 **Questions**
Answer only what you know
CMP 012 · 013

5 **After**
Report the same day
CMP 007

FIVE TERMS YOU'LL SEE ON EVERY PAGE

Dawn raid
An unannounced GAC inspection of your premises, files, laptops and phones.

Price-fixing
Agreeing with rival dealers on prices, discounts or labour rates, even informally.

Market sharing
Splitting cities, regions or customer groups with competitors.

Bid rigging
Coordinating bids for fleet or government tenders.

Obstruction
Blocking, delaying, misleading or hiding or deleting anything during an inspection.

WHO IT'S FOR · MOST RELEVANT TO LARGE AND MARKET-LEADING DEALER GROUPS

Dealer principals & GMs
Know the exposure and make sure every site is ready.

Legal & site managers
One procedure, tied to the law, with evidence rules.

Auditors
Consistent scoring and mock-raid tests to run on site.

THE CAR SECTOR IS ALREADY IN GAC'S SIGHTS

GAC has already taken car agents to court.

43
car agents and distributors referred for **criminal lawsuits** after spare-parts and after-sales investigations (2022)

Aug 2023
GAC study of the **entire automotive supply chain** flags possible violations in retail, parts and after-sales

64
establishments sent to criminal proceedings (Dec 2023), including auto businesses accused of **fixing prices and splitting regions**

THE COMPETITION LAW PENALTY LADDER

LEVEL 1
SAR 5M / 5%
Obstructing an inspection: blocking, false information, hiding or deleting documents.

LEVEL 2
10% of sales
Price-fixing, market sharing, abuse of dominance: up to 10% of annual sales or SAR 10M (Art. 19).

LEVEL 3
3× the gains
Or up to three times the profit made from the violation, where GAC can calculate it.

LEVEL 4
Doubled + court
Repeat within 3 years: doubled. Criminal lawsuit, and the decision published at your cost.

WHAT COMPANIES IN SAUDI ARABIA ARE ACTUALLY PAYING

WHO	FINE	WHAT THEY DID
13 companies Price-fixing · Dec 2025	**SAR 36.9M** ≈ SAR 2.84M each	Agreed prices across pharmacy, waste, medical supplies, dairy and media
MediServ Obstruction · 2023	**SAR 13M** one company	Withheld information and prevented GAC officers from doing their work
4 companies Abuse of dominance · Aug 2020	**SAR 53M** up to SAR 20M each	Blocked competitors from entering or pushed them out of the market
3 companies Bid rigging · Dec 2020	**SAR 15M** SAR 5M each	Colluded on bids for Public Security contracts
Panda + target Merger filing · Feb 2024	**SAR 800K** SAR 400K each	Didn't notify GAC of an acquisition before completing it

AVERAGE FINE PER COMPANY
≈ SAR 5.2M
Across the **23 companies** in these 5 GAC decisions: SAR 118.7M in total.

WHAT 10% LOOKS LIKE FOR A DEALER
SAR 50M
If a violation covers **SAR 500M of annual sales**, 10% is SAR 50 million. **SAR 100M** if repeated.

HOW TO USE THIS GUIDE

One page per standard. One price per mistake.

Critical standards carry a direct fine: obstruction, up to SAR 5M or 5% of annual sales. **Linked** standards have no fine of their own, but a gap there is how obstruction or cartel findings happen. Fix times are counted from audit submission.

Immediate | 24 hours | 72 hours | 7 days | 30 days

THE 17 COMPETITION LAW STANDARDS

BEFORE A RAID

CMP-001	Dawn-Raid Procedures Available & Known	LINKED	SAR 5M	7 days	5
CMP-002	Dawn-Raid Contact Persons Designated	LINKED	SAR 5M	24 hours	6
CMP-003	Dawn-Raid Preparedness Before Inspection	LINKED	SAR 5M	7 days	7
CMP-004	Contact Persons Displayed at Reception & Gate	LINKED	SAR 5M	72 hours	8
CMP-006	Contact Sheet Checked & Updated	LINKED	SAR 5M	24 hours	10
CMP-008	Site Staff Trained on Dawn Raids	LINKED	SAR 5M	30 days	12
CMP-009	Dawn-Raid Procedures Known & Accessible	LINKED	SAR 5M	72 hours	13
CMP-016	Documents to Copy During Dawn Raid	LINKED	SAR 5M	7 days	20
CMP-017	Competition Law Self-Assessment	LINKED	10% of sales	30 days	21

DURING A RAID

CMP-005	Conduct During GAC Inspection	CRITICAL	SAR 5M	7 days	9
CMP-010	Cooperation With Authority Searches	CRITICAL	SAR 5M	7 days	14
CMP-011	No Deletion of Documents During Raid	CRITICAL	SAR 5M	Immediate	15
CMP-012	Handling Questions Outside Own Knowledge	CRITICAL	SAR 5M	7 days	16
CMP-013	Responding to Market Share Questions	CRITICAL	SAR 5M	7 days	17
CMP-014	Handling Requests for Document Copies	CRITICAL	SAR 5M	7 days	18
CMP-015	Handling Requests for Electronic Copies	CRITICAL	SAR 5M	7 days	19

AFTER A RAID

CMP-007	Post-Inspection Reporting & Follow-Up	LINKED	SAR 5M	7 days	11

PASS
Every criterion met at the time of audit, with evidence captured.

FAIL
Any criterion not met. Record it, attach evidence, create an action.

N/A
Rarely. Every site can be raided. Record the reason with Legal's approval.

autosmart

CMP-001 COMPETITION · BEFORE A RAID · 01 OF 17

Dawn-Raid Procedures Available & Known

Area **Whole site · Reception · Gate**

Person in charge **Site Manager · Legal & Compliance**

Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

The company's dawn-raid procedure, checklists and SOPs are physically available at the site, and staff know they exist.

CHECKPOINTS IN THE AUDIT

Q1 Are the company's dawn-raid procedure, checklists and SOPs available at the site?

Q2 Are all staff aware of the company's dawn-raid procedure, checklists and SOPs?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

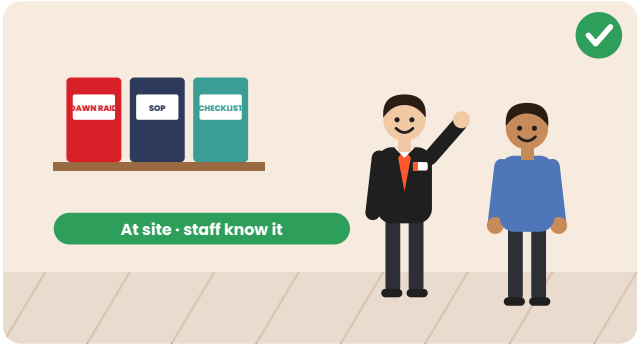
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

43

car agents and distributors referred by GAC for criminal lawsuits (2022) after investigations into spare parts and after-sales.

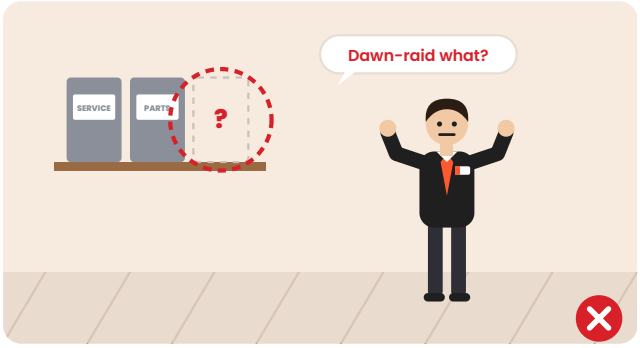
✔ RIGHT WAY



SOP, checklist and contact binder on the shelf, and staff can point to them.

✖ WRONG WAY

LINKED · SAR 5M



The SOP slot is empty. Staff have never heard of a dawn raid.

PURPOSE

GAC officers can arrive unannounced. The SOP is the script that stops a panicked employee from turning an inspection into an obstruction case.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Current SOP and checklists physically at the site
- Also available on the shared drive
- Staff asked at random know it exists and where it is

IDEAL WAY OF AUDITING

1. Ask reception to produce the SOP
2. Check the version date against the latest issue
3. Ask 3 staff what they'd do if GAC arrived

Evidence: Photo of the SOP at site + notes of staff answers.

WORST CASE The SOP costs nothing. An employee who doesn't know it and blocks the door can cost the company **up to SAR 5 million**, before the real investigation even starts.

CMP-002 COMPETITION · BEFORE A RAID · 02 OF 17

Dawn-Raid Contact Persons Designated

Area **Whole site · Reception · Gate**

Person in charge **Site Manager · Legal & Compliance**

Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

Named people (usually Legal and Compliance, plus a site deputy) are designated to be called the moment GAC officials arrive, with names, emails and phone numbers on file.

CHECKPOINTS IN THE AUDIT

Q1 Have the names, emails and phone numbers of the designated contact persons, to be contacted if officials from the General Authority for Competition (GAC) visit the site/business unit, been provided?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

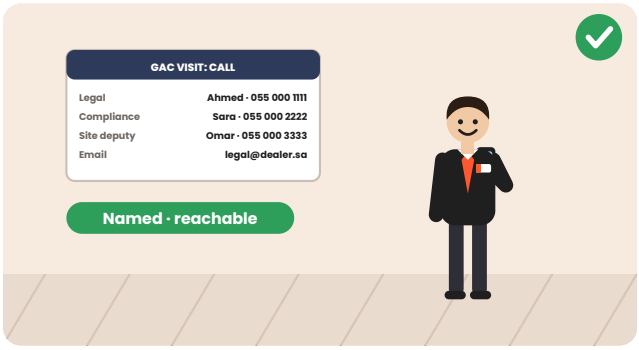
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

GAC IS WATCHING AUTOS

Aug 2023

GAC finished a study of the **whole automotive supply chain** (retail, spare parts, after-sales) and flagged possible Competition Law violations.

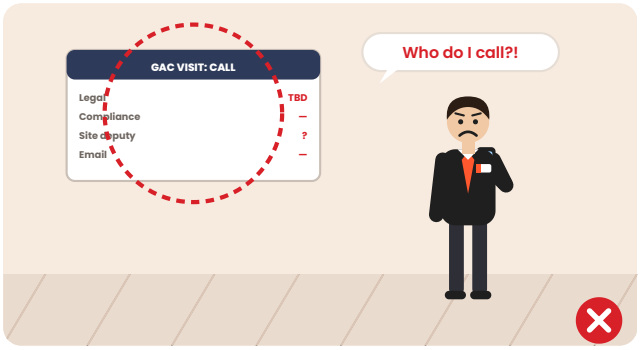
✔ RIGHT WAY



Legal, Compliance and a site deputy named, each with a direct mobile number.

✖ WRONG WAY

LINKED · SAR 5M



Contact list says "TBD". Nobody knows who to call.

PURPOSE

The first 30 minutes of a raid are the most dangerous. A named, reachable contact means Legal is guiding the site before anyone says the wrong thing.

FIX IT WITHIN

◷ 24 hours

AUDIT CRITERIA · PASS WHEN

- At least 2 named contact persons plus a deputy
- Direct mobile and email for each
- Contacts confirmed as current this quarter

IDEAL WAY OF AUDITING

1. Ask for the contact person list
2. Call one number to test it
3. Check the list is identical at every site

Evidence: Contact list + test call record.

WORST CASE Without a named contact, the most junior person on shift handles GAC alone. One refusal or deleted file becomes **an obstruction finding of up to SAR 5 million**.

CMP-003 COMPETITION · BEFORE A RAID · 03 OF 17

Dawn-Raid Preparedness Before Inspection

Area **Whole site · Reception · Gate**

Person in charge **Site Manager · Legal & Compliance**

Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

The site manager knows the procedure cover to cover, staff and security know their roles, and computers hold only work files.

CHECKPOINTS IN THE AUDIT

- **Q1** Has the site manager read and understood the company's dawn-raid procedure from cover to cover?
- **Q2** Have site staff been informed of the dawn-raid procedure and prepared accordingly?
- **Q3** Are staff computers free of unrelated personal files?
- **Q4** Have security and other staff been told who greets the officials, where to host them, and to inform the site manager immediately?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

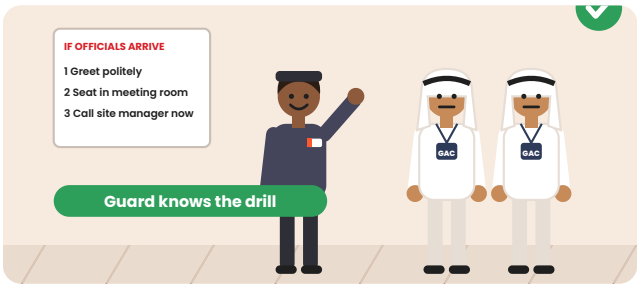
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 13M

fine on MediServ (2023) for **withholding information and preventing GAC officers** from doing their job during an investigation.

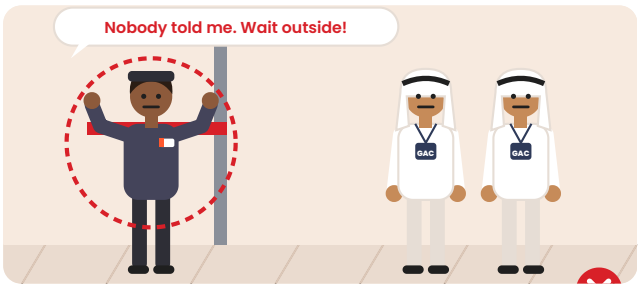
✔ RIGHT WAY



Guard follows a 3-step card: greet, seat in the meeting room, call the site manager.

✖ WRONG WAY

LINKED · SAR 5M



Guard was never briefed and tells GAC officers to wait outside.

PURPOSE

Security and reception meet the officers first. If they don't know the drill, the obstruction starts at the gate.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Site manager confirms reading the full procedure
- Security and reception have a written 3-step card
- Staff computers hold work files only

IDEAL WAY OF AUDITING

1. Ask the site manager 3 questions from the SOP
2. Ask the gate guard: "GAC is here. What do you do?"
3. Spot-check 2 computers for personal files

Evidence: Signed read-confirmation + photo of guard card + spot-check notes.

WORST CASE MediServ was fined **SAR 13 million** for keeping GAC officers from their work. It can start with a guard who was never told what to do.

CMP-004 COMPETITION · BEFORE A RAID · 04 OF 17

Contact Persons Displayed at Reception & Gate

Area **Reception · Security gate** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

Reception and the security office at the gate display a sign with the names and office and mobile numbers of the people to call when government officials visit.

CHECKPOINTS IN THE AUDIT

Q1 Do the reception desk and the security office at the site gate have signboards showing the names and phone numbers (office and mobile) of the contact persons to be reached in case of a visit by government officials?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

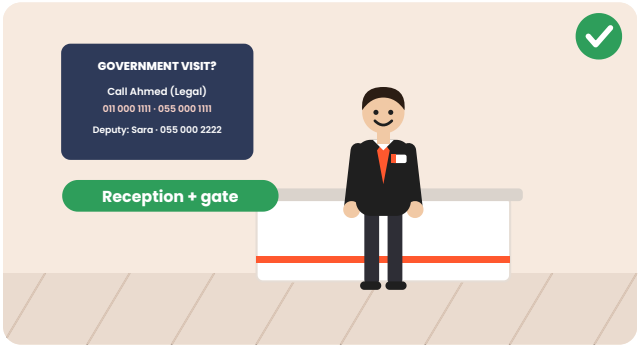
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

GAC IS WATCHING AUTOS

Aug 2023

GAC finished a study of the **whole automotive supply chain** (retail, spare parts, after-sales) and flagged possible Competition Law violations.

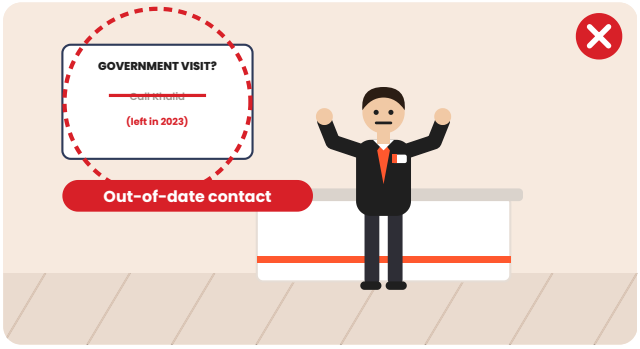
✔ RIGHT WAY



Sign at reception and at the gate: who to call, with office and mobile numbers.

✖ WRONG WAY

LINKED · SAR 5M



Sign still names someone who left in 2023.

PURPOSE

Reception staff shouldn't have to search a drawer while officers wait. The sign turns a stressful moment into one phone call.

FIX IT WITHIN

72 hours

AUDIT CRITERIA · PASS WHEN

- Sign at reception and at the security gate
- Names match the current contact sheet
- Office and mobile number for each person

IDEAL WAY OF AUDITING

1. Photograph both signs
2. Compare names with the contact sheet
3. Dial one number from reception

Evidence: Photos of both signs + comparison with contact sheet.

WORST CASE A wrong number on the wall means minutes lost while officers wait, and **every minute of delay can be read as obstruction**: up to SAR 5 million.

CMP-005 COMPETITION · DURING A RAID · 05 OF 17

Conduct During GAC Inspection

Area **Whole site · Reception · Gate**

Person in charge **Site Manager · Legal & Compliance**

Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

or up to 5% of total annual sales, per obstruction finding

And the investigation continues: **up to 10% of sales** for the violation itself

• CRITICAL

THE LAW
GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M** · Officials' ID and letter of investigation checked under **Art. 39** · Truthful answers: **Art. 7**

WHAT WE CHECK

Staff welcome officials calmly, check their IDs and investigation letter, call Legal at once, answer only what they know, and stamp and copy everything officials take.

CHECKPOINTS IN THE AUDIT

- **Q1** Do site staff welcome the officials properly, remain calm throughout the process and accompany them throughout the inspection?
- **Q2** Are the officials' IDs and the official letter of investigation requested, checked and copied (per Article 39)?
- **Q3** Is the Legal/Compliance team informed immediately and kept updated throughout the inspection?
- **Q4** Are questions answered truthfully, only when directly related to the respondent's position and fully certain, with all questions and answers recorded?
- **Q5** Is each page of documents copied or seized annotated "Confidential", signed and stamped, with a complete copy retained?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Obstructing a GAC inspection, giving false information, or concealing or destroying documents: **up to 5% of total annual sales, max SAR 5 million**.

BEYOND THE FINE

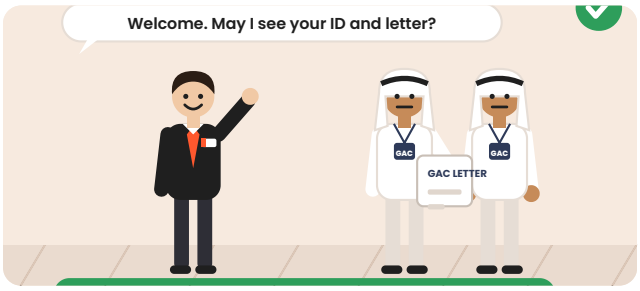
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 13M

fine on MediServ (2023) for **withholding information and preventing GAC officers** from doing their job during an investigation.

✔ RIGHT WAY



Officers welcomed, ID and letter checked, Legal already on the phone.

✖ WRONG WAY

UP TO SAR 5M



Manager tells the officers to come back tomorrow and closes the door.

PURPOSE

Cooperating is not optional. Calm, correct conduct protects the company's rights and keeps an inspection from becoming a second case.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Officials greeted, accompanied and never left alone
- IDs and letter checked and copied; Legal called at once
- Every document taken is stamped, signed and copied

IDEAL WAY OF AUDITING

1. Run a 15-minute mock raid with a colleague as "officer"
2. Score each of the 10 checkpoints
3. Review the mock raid record with Legal

Evidence: Mock-raid scorecard + copies of the forms used.

WORST CASE Refuse entry, argue or stall, and the company faces **up to SAR 5 million** for obstruction on top of whatever GAC came to investigate: **up to 10% of sales**.

CMP-006 COMPETITION · BEFORE A RAID · 06 OF 17

Contact Sheet Checked & Updated

Area **Whole site · Reception · Gate**

Person in charge **Site Manager · Legal & Compliance**

Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

The dawn-raid contact sheet is checked regularly, shows the date of its last update, and a copy is uploaded to the system.

CHECKPOINTS IN THE AUDIT

Q1 Has the contact sheet been recently checked and updated (date of last update recorded), and has a copy been uploaded to the system?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

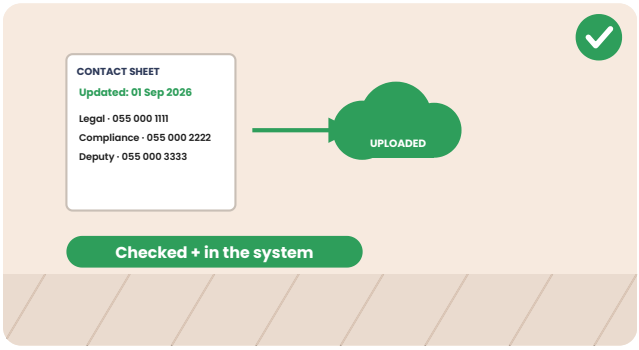
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

PAPERWORK COUNTS

SAR 800K

fine on Panda Retail and its target (Feb 2024) for a **procedural failure**: not notifying GAC of a deal. GAC fines paperwork gaps too.

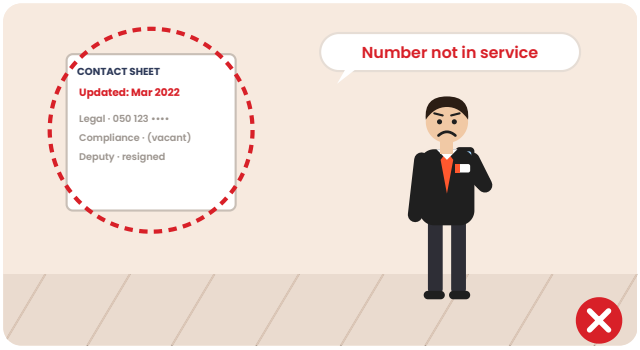
✔ RIGHT WAY



Contact sheet updated this month and uploaded to the shared system.

✖ WRONG WAY

LINKED · SAR 5M



Last updated in 2022. Numbers are dead and the deputy has resigned.

PURPOSE

People change jobs. A contact sheet that isn't checked quietly stops working, and you only find out in the middle of a raid.

FIX IT WITHIN

◷ 24 hours

AUDIT CRITERIA · PASS WHEN

- Last-update date within the last 3 months
- Every number and email tested
- Copy uploaded and matching the printed version

IDEAL WAY OF AUDITING

1. Read the last-update date
2. Test 2 numbers
3. Compare the printed and uploaded versions

Evidence: Contact sheet showing the update date + system screenshot.

WORST CASE A dead number means no Legal support while officers search. Whatever staff do alone, the company answers for: **up to SAR 5 million**.

autosmart

CMP-007 COMPETITION · AFTER A RAID · 07 OF 17

Post-Inspection Reporting & Follow-Up

Area **Whole site · Reception · Gate** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M** · Substantive penalties: **Art. 19**

WHAT WE CHECK

Right after officials leave, the site completes the dawn-raid information sheet, sends every document to Legal and books a briefing on next steps.

CHECKPOINTS IN THE AUDIT

- **Q1** Is the dawn-raid information sheet prepared immediately after the officials leave?
- **Q2** Are all documents related to the dawn raid (information sheet, GAC decision, officials' report, copies of seized documents including electronic) sent to the Legal/Compliance team?
- **Q3** Is a briefing session arranged with the Legal/Compliance team to discuss developments and how to proceed?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

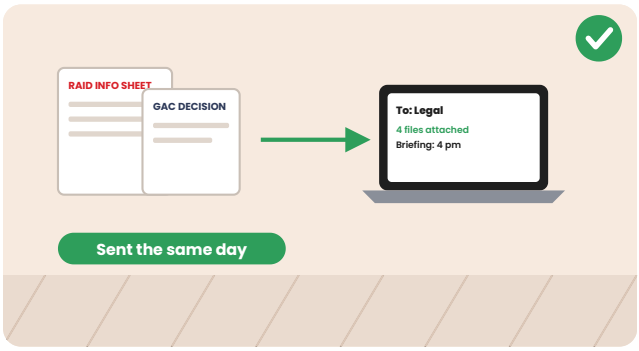
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

THE RACE TO REPORT

Immunity

went to one firm in a 2022 GAC case for **exposing its accomplices**. The rival you coordinate with can walk free by reporting you.

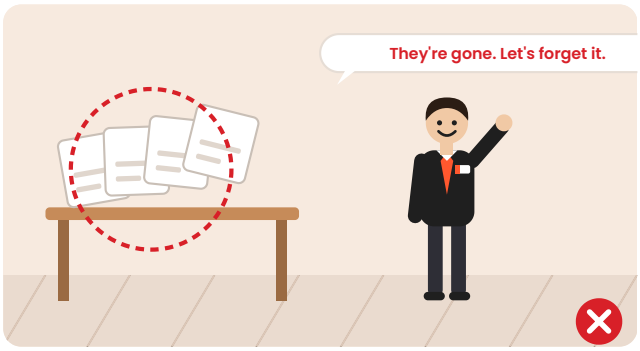
✔ RIGHT WAY



Information sheet, GAC decision and copies sent to Legal the same day, with a briefing booked.

✖ WRONG WAY

LINKED · SAR 5M



Papers left on a desk. "They're gone, let's forget it."

PURPOSE

The raid ends. The case doesn't. Legal needs the full record the same day to protect the company's position.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Information sheet completed the same day
- All 4 document sets sent to Legal
- Briefing with Legal held within 48 hours

IDEAL WAY OF AUDITING

1. Ask for the last raid or mock-raid file
2. Check all 4 document sets are there
3. Check the briefing date

Evidence: Information sheet + email to Legal + briefing invite.

WORST CASE Ignore the aftermath and you lose the window to act. A rival that reports first may **get immunity** while you face **up to 10% of annual sales**.

CMP-008 COMPETITION · BEFORE A RAID · 08 OF 17

Site Staff Trained on Dawn Raids

Area **All site staff** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

Site staff have been trained on dawn raids by the designated contact persons, with the trainer's name and training date recorded.

CHECKPOINTS IN THE AUDIT

Q1 Have site staff been trained/informed on dawn raids by the contact persons? (If yes, record the name and date of the training.)

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

43

car agents and distributors referred by GAC for criminal lawsuits (2022) after investigations into spare parts and after-sales.

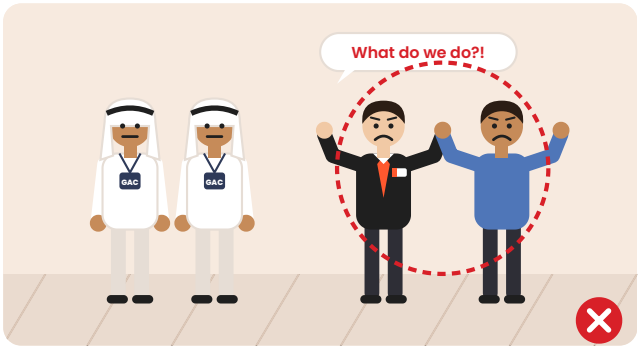
✔ RIGHT WAY



Team trained on the three rules: don't block, don't delete, call Legal.

✖ WRONG WAY

LINKED · SAR 5M



Officers arrive and nobody knows what to do.

PURPOSE

Training is what makes the SOP real. Panic is when people hide phones, delete files and guess answers.

FIX IT WITHIN

30 days

AUDIT CRITERIA · PASS WHEN

- Training delivered by a designated contact person
- Trainer name and date recorded
- Attendance covers all customer-facing and management staff

IDEAL WAY OF AUDITING

1. Ask for the training record
2. Check the attendance list against staff on duty
3. Ask 2 staff the three rules

Evidence: Training record with trainer, date and attendance.

WORST CASE Untrained staff under pressure do exactly what the law punishes: **block, hide or delete**. Each is an obstruction finding of up to **SAR 5 million**.

autosmart

CMP-009 COMPETITION · BEFORE A RAID · 09 OF 17

Dawn-Raid Procedures Known & Accessible

Area **Whole site · Reception · Gate** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

Responsible staff know which procedure applies in a dawn raid and can find it in seconds, on paper or on the shared drive.

CHECKPOINTS IN THE AUDIT

Q1 Do responsible staff know which procedures to apply in case of a dawn raid and where to find them?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

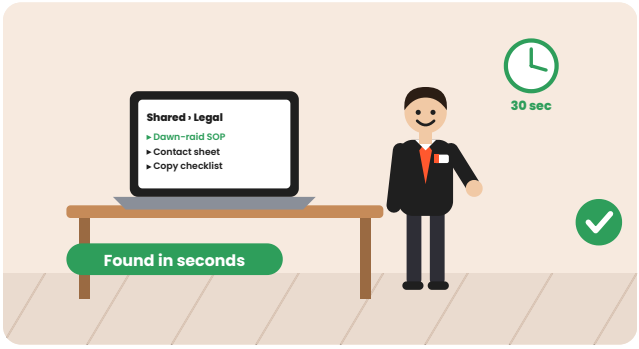
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

GAC IS WATCHING AUTOS

Aug 2023

GAC finished a study of the **whole automotive supply chain** (retail, spare parts, after-sales) and flagged possible Competition Law violations.

✔ RIGHT WAY



SOP found in 30 seconds in a clearly named shared folder.

✖ WRONG WAY

LINKED · SAR 5M



20 minutes searching drawers while the officers wait.

PURPOSE

An SOP nobody can find is the same as no SOP. When officers are standing in reception, seconds matter.

FIX IT WITHIN

72 hours

AUDIT CRITERIA · PASS WHEN

- Responsible staff name the right procedure
- They find it within 1 minute
- Paper and digital versions match

IDEAL WAY OF AUDITING

1. Ask a manager to open the SOP, and time it
2. Check the folder name is obvious
3. Compare paper and digital versions

Evidence: Time taken + screenshot of folder location.

WORST CASE Every minute spent searching is a minute officers wait. Delay can be read as obstruction: **up to SAR 5 million**.

CMP-010 COMPETITION · DURING A RAID · 10 OF 17

Cooperation With Authority Searches

Area **Offices · Laptops · Phones** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

or up to 5% of total annual sales, per obstruction finding

And the investigation continues: **up to 10% of sales** for the violation itself

• CRITICAL

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

Staff understand they must let GAC inspectors search their office, laptop, mobile phone and documents at work, even when they contain personal or confidential information.

CHECKPOINTS IN THE AUDIT

Q1 Do staff understand that they must allow General Authority for Competition (GAC) inspectors to search their office, laptop, mobile phone and personal documents in the office, even if these include personal or company-confidential information?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Obstructing a GAC inspection, giving false information, or concealing or destroying documents: **up to 5% of total annual sales, max SAR 5 million**.

BEYOND THE FINE

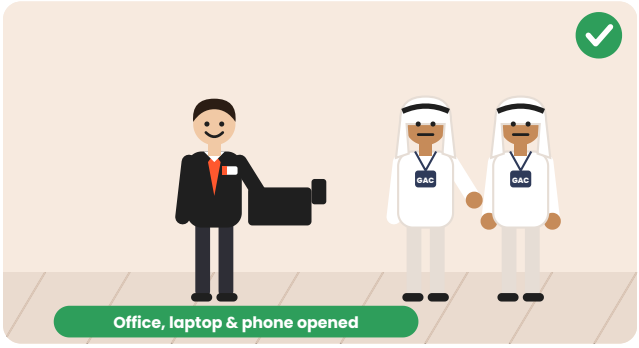
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 13M

fine on MediServ (2023) for **withholding information and preventing GAC officers** from doing their job during an investigation.

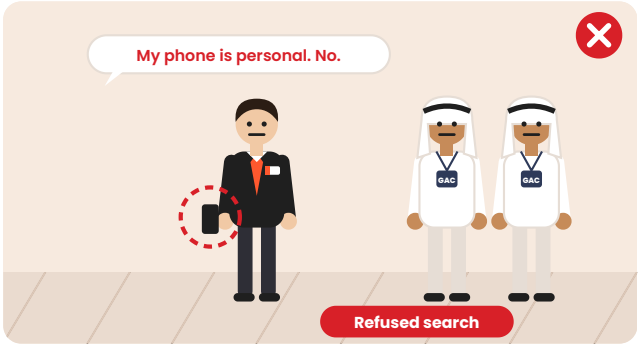
✔ RIGHT WAY



Employee unlocks laptop and phone for the officers without argument.

✖ WRONG WAY

UP TO SAR 5M



Employee refuses: "My phone is personal."

PURPOSE

Many staff believe they can refuse to hand over a phone. They can't, and a refusal is obstruction by the company.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Staff confirm officers may search office, laptop and phone
- Staff know to call Legal, not to refuse
- Work phones and chats are not hidden

IDEAL WAY OF AUDITING

1. Ask 3 staff: "Can you refuse to show your phone?"
2. Check the SOP says this clearly
3. Confirm it's covered in training

Evidence: Staff answers + SOP section reference.

WORST CASE One employee hiding a phone can turn an inspection into an obstruction case: **up to SAR 5 million**, plus whatever GAC finds on the phone later.

CMP-011 COMPETITION · DURING A RAID · 11 OF 17

No Deletion of Documents During Raid

Area **IT · All staff** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

or up to 5% of total annual sales, per obstruction finding

And the investigation continues: **up to 10% of sales** for the violation itself

• CRITICAL

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M** (concealing or destroying documents)

WHAT WE CHECK

Staff understand that no document, file, email or chat may be deleted or destroyed once a raid has started.

CHECKPOINTS IN THE AUDIT

Q1 Do staff understand that no documents or files may be deleted or destroyed during a dawn raid?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Obstructing a GAC inspection, giving false information, or concealing or destroying documents: **up to 5% of total annual sales, max SAR 5 million**.

BEYOND THE FINE

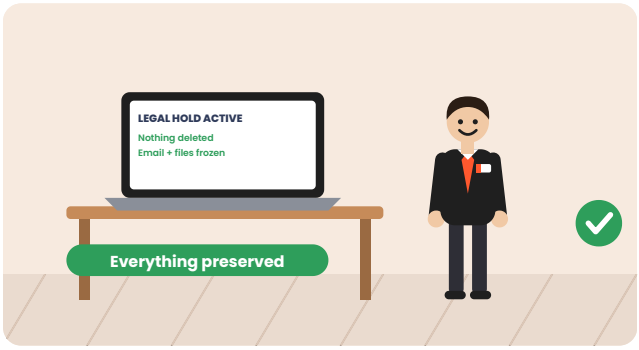
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 13M

fine on MediServ (2023) for **withholding information and preventing GAC officers** from doing their job during an investigation.

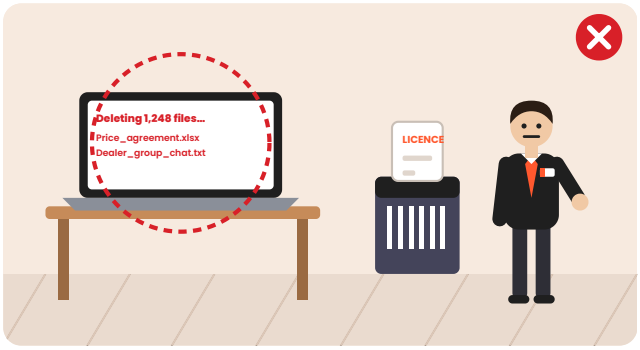
✔ RIGHT WAY



Legal hold switched on: nothing can be deleted, email and files are frozen.

✖ WRONG WAY

SAR 5M + EVIDENCE



Laptop deleting pricing files while the shredder runs.

PURPOSE

Deleting a file during a raid is the fastest way to turn a suspicion into a conviction. It is also a violation in itself.

FIX IT WITHIN

Immediate

AUDIT CRITERIA · PASS WHEN

- Staff state clearly that nothing may be deleted or shredded
- IT can freeze email and files on Legal's instruction
- Shredding is suspended during a raid

IDEAL WAY OF AUDITING

1. Ask 3 staff what they'd do with an "awkward" file
2. Ask IT how fast they can apply a hold
3. Check the SOP covers shredders and chats

Evidence: Staff answers + IT legal-hold procedure.

WORST CASE A deleted file is **obstruction (up to SAR 5M)** and evidence that something was worth hiding. GAC treats it as exactly that.

CMP-012 COMPETITION · DURING A RAID · 12 OF 17

Handling Questions Outside Own Knowledge

Area **Sales · Service · Parts managers** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

or up to 5% of total annual sales, per obstruction finding

And the investigation continues: **up to 10% of sales** for the violation itself

• CRITICAL

THE LAW
GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M** (false information) · Truthful answers: **Art. 7**

WHAT WE CHECK

Staff know not to guess or estimate. If a question is outside their knowledge or responsibility, they refer officers to the person responsible.

CHECKPOINTS IN THE AUDIT

Q1 Do staff know that, if officers ask a question they do not know well or for which they are not responsible, they must not give an estimate and should refer the officers to the responsible person?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Obstructing a GAC inspection, giving false information, or concealing or destroying documents: **up to 5% of total annual sales, max SAR 5 million**.

BEYOND THE FINE

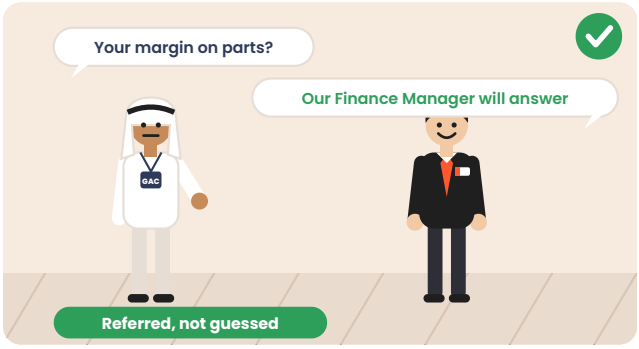
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 36.9M

in fines on 13 companies for price-fixing (Dec 2025): about **SAR 2.84M per company**, in one decision.

✔ RIGHT WAY



"Our Finance Manager will answer that."

✖ WRONG WAY

UP TO SAR 5M



"Probably around 40%?" A guess, now on the record.

PURPOSE

A guess recorded by GAC becomes evidence. Wrong numbers can count as false information, and right ones given by the wrong person can mislead.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Staff say they refer, not guess
- They know who owns pricing, margins and discounts
- All answers are recorded

IDEAL WAY OF AUDITING

1. Ask 2 staff a margin question and watch the answer
2. Check the SOP lists who answers what
3. Review the Q&A record template

Evidence: Staff test notes + SOP responsibility list.

WORST CASE A casual guess about margins or discounts can open a price-fixing case. In Dec 2025 that cost 13 companies **SAR 36.9 million**.

CMP-013 COMPETITION · DURING A RAID · 13 OF 17

Responding to Market Share Questions

Area **Management · Sales** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

or up to 5% of total annual sales, per obstruction finding

And the investigation continues: **up to 10% of sales** for the violation itself

• CRITICAL

THE LAW
GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M** · Abuse of dominance: **Art. 6** · Penalties: **Art. 19**

WHAT WE CHECK

Staff know not to estimate market share. Questions about position in the market are referred to Legal and answered in writing.

CHECKPOINTS IN THE AUDIT

Q1 Do staff know how to respond if, during a dawn raid, officers ask about the company's market share?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Obstructing a GAC inspection, giving false information, or concealing or destroying documents: **up to 5% of total annual sales, max SAR 5 million**.

BEYOND THE FINE

The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

64

establishments referred for criminal proceedings in Dec 2023, including **automotive businesses accused of fixing prices and splitting regions**.

✔ RIGHT WAY



"Legal will answer that in writing."

✖ WRONG WAY

UP TO SAR 5M



"We own this city. Maybe 60%." A boast now in GAC's file.

PURPOSE

Market share decides whether a company is treated as dominant. A throwaway boast can put the company in the dominance category.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Staff refer market-share questions to Legal
- No estimates or boasts
- Written answer route agreed with Legal

IDEAL WAY OF AUDITING

1. Ask 2 managers "What's your market share?"
2. Check the SOP covers it
3. Confirm Legal's written-answer process

Evidence: Staff test notes + SOP reference.

WORST CASE "We own this city" can make you **dominant** in GAC's eyes, and abuse of dominance carries **up to 10% of annual sales or SAR 10M**.

CMP-014 COMPETITION · DURING A RAID · 14 OF 17

Handling Requests for Document Copies

Area **Management · Admin** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

or up to 5% of total annual sales, per obstruction finding

And the investigation continues: **up to 10% of sales** for the violation itself

• CRITICAL

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

When officers ask for copies, staff provide them, mark each page "Confidential", sign and stamp it, and keep a complete copy for the company.

CHECKPOINTS IN THE AUDIT

Q1 Do relevant associates know what to do when officers request copies of documents?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Obstructing a GAC inspection, giving false information, or concealing or destroying documents: **up to 5% of total annual sales, max SAR 5 million**.

BEYOND THE FINE

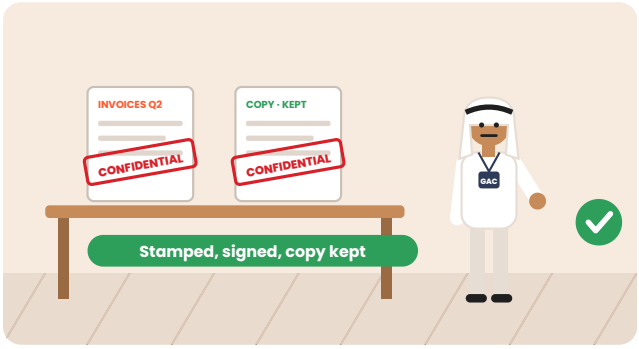
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 36.9M

in fines on 13 companies for price-fixing (Dec 2025): about **SAR 2.84M per company**, in one decision.

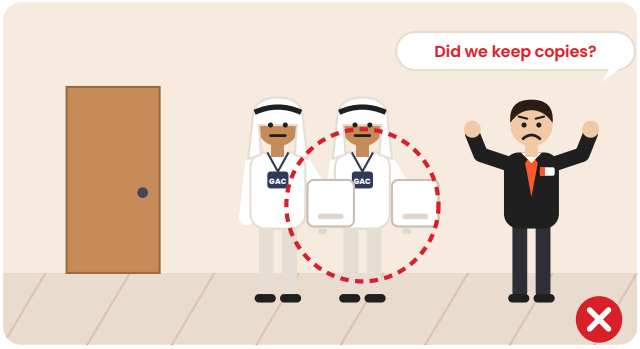
✔ RIGHT WAY



Every page stamped "Confidential" and signed, with an identical set kept.

✖ WRONG WAY

UP TO SAR 5M



Officers leave with originals. Nobody knows what was taken.

PURPOSE

If you don't know what GAC took, Legal can't defend the company. The copy set is your half of the evidence.

FIX IT WITHIN

7 days

AUDIT CRITERIA · PASS WHEN

- Copies provided without delay
- Each page marked "Confidential", signed and stamped
- An identical set retained and logged

IDEAL WAY OF AUDITING

1. Ask a manager to walk through the copy process
2. Check a stamp and log template exist
3. Review a mock-raid copy set

Evidence: Copy log template + photo of stamp + mock-raid set.

WORST CASE Refuse a copy request and it's obstruction: **up to SAR 5 million**. Hand over papers without keeping copies and you're **defending blind**.

CMP-015 COMPETITION · DURING A RAID · 15 OF 17

Handling Requests for Electronic Copies

Area **IT · Management** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

or up to 5% of total annual sales, per obstruction finding

And the investigation continues: **up to 10% of sales** for the violation itself

• CRITICAL

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

Electronic documents requested by officers are handed over on CD/DVD (not USB), and an identical copy is kept by the company.

CHECKPOINTS IN THE AUDIT

Q1 Do relevant associates know what to do when officers request copies of electronic documents?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Obstructing a GAC inspection, giving false information, or concealing or destroying documents: **up to 5% of total annual sales, max SAR 5 million**.

BEYOND THE FINE

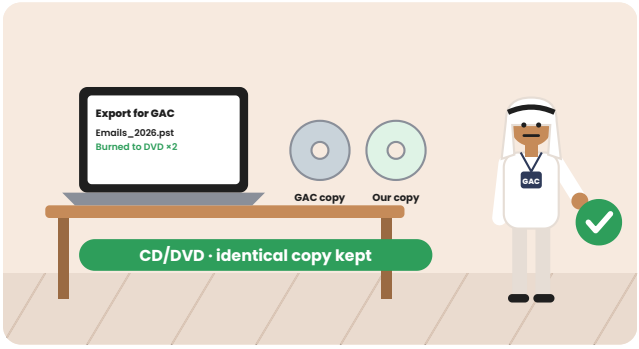
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 13M

fine on MediServ (2023) for **withholding information and preventing GAC officers** from doing their job during an investigation.

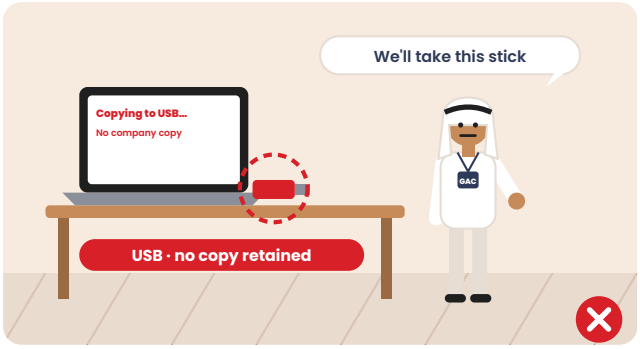
✔ RIGHT WAY



Files burned to two identical DVDs: one for GAC, one kept.

✖ WRONG WAY

UP TO SAR 5M



Files copied to a USB stick. No company copy.

PURPOSE

Electronic files are where the evidence lives today: emails, chats, spreadsheets. You need to know exactly what was handed over.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- IT can export to CD/DVD on request
- An identical copy retained and logged
- USB is not used for handover

IDEAL WAY OF AUDITING

1. Ask IT to show the export process
2. Check blank DVDs are on site
3. Review the electronic copy log

Evidence: Export procedure + copy log + photo of media.

WORST CASE Delay or refuse an electronic copy and it's obstruction: **up to SAR 5 million**. Hand it over without a copy and you **can't check what GAC is relying on**.

CMP-016 COMPETITION · BEFORE A RAID · 16 OF 17

Documents to Copy During Dawn Raid

Area **Contact persons** | Person in charge **Site Manager · Legal & Compliance** | Regulator **GAC**

MAXIMUM PENALTY

SAR 5,000,000

linked exposure: no fine for this control itself

Weak readiness is how **obstruction findings** happen

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · Readiness control linked to the Obstruction-of-inspection provision: fine up to **5% of total annual sales, max SAR 5M**

WHAT WE CHECK

Contact persons know the fixed list of documents they must copy during a raid: the GAC decision, officers' IDs, their report and everything seized.

CHECKPOINTS IN THE AUDIT

Q1 Do contact persons know which documents they must take copies of during a dawn raid?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for this control on its own. But without it, staff improvise during a raid, and one wrong move is an obstruction finding of **up to SAR 5 million**.

BEYOND THE FINE

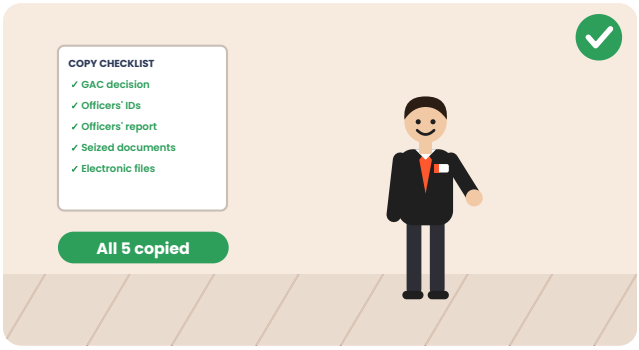
The raid is only the start. If GAC finds price-fixing or market sharing, the fine is **up to 10% of annual sales or SAR 10M**, doubled on repeat and **published at your cost**.

REAL ENFORCEMENT

SAR 36.9M

in fines on 13 companies for price-fixing (Dec 2025): about **SAR 2.84M per company**, in one decision.

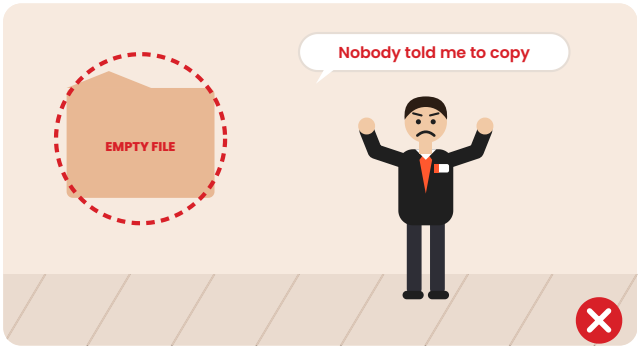
✔ RIGHT WAY



Five-item copy checklist completed before the officers leave.

✖ WRONG WAY

LINKED · SAR 5M



The raid file is empty. Nobody knew to copy anything.

PURPOSE

Legal's defence depends on knowing the scope of the investigation. That's written on the documents officers bring and take.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Contact persons name all 5 document types
- Copy checklist kept with the SOP
- Checklist used in the last mock raid

IDEAL WAY OF AUDITING

1. Ask a contact person to list what they'd copy
2. Check the checklist is with the SOP
3. Review the last mock-raid file

Evidence: Copy checklist + mock-raid file.

WORST CASE Without the GAC decision and report, Legal can't tell what you're accused of, and a price-fixing finding is **up to 10% of annual sales**.

CMP-017 COMPETITION · BEFORE A RAID · 17 OF 17

Competition Law Self-Assessment

Area **Management · Sales · Aftersales**

Person in charge **Site Manager · Legal & Compliance**

Regulator **GAC**

MAXIMUM PENALTY

SAR 10,000,000

or up to 10% of annual sales, or 3× the gains · linked exposure

Repeat within 3 years: **doubled** · decision published at your cost

• LINKED

THE LAW

GAC

Competition Law (Royal Decree M/75 of 29/06/1440H) and its Implementing Regulations · General Authority for Competition (GAC) · **Art. 5** (anti-competitive agreements: price-fixing, market sharing, bid rigging) · **Art. 6** (abuse of dominance) · Penalties: **Art. 19**

WHAT WE CHECK

The site has completed its latest competition-law self-assessment, checking pricing, territories, rival contacts and tenders.

CHECKPOINTS IN THE AUDIT

Q1 Has the site conducted its most recent competition law self-assessment?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

No fine for skipping the assessment itself. The conduct it's meant to catch (price-fixing, market sharing) carries **up to 10% of annual sales or SAR 10M, or 3× the gains**.

BEYOND THE FINE

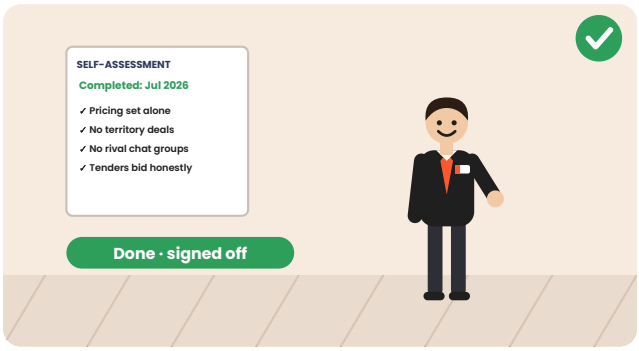
Doubled for a repeat within 3 years. The **decision is published at your cost**. GAC can also file a **criminal lawsuit**, as it has against car agents.

REAL ENFORCEMENT

64

establishments referred for criminal proceedings in Dec 2023, including **automotive businesses accused of fixing prices and splitting regions**.

✔ RIGHT WAY



Self-assessment done and signed off: pricing, territories, chats and tenders checked.

✖ WRONG WAY

UP TO 10% OF SALES



Dealer WhatsApp group agrees labour rates and splits the city.

PURPOSE

Dawn raids happen because of what's happening in the business. The self-assessment finds a cartel risk before GAC does.

FIX IT WITHIN

◷ 30 days

AUDIT CRITERIA · PASS WHEN

- Latest self-assessment completed and dated
- Covers pricing, territories, rival contacts and tenders
- Findings have owners and deadlines

IDEAL WAY OF AUDITING

1. Ask for the latest self-assessment
2. Check its date and scope
3. Ask managers about any rival dealer chat groups

Evidence: Self-assessment report + action log.

WORST CASE One WhatsApp group agreeing prices with rival dealers can cost **up to 10% of annual sales**, doubled if it happens again, **published in the press at your cost**.

BE READY BEFORE GAC KNOCKS

Your 30-day dawn-raid action plan.

Start on the left. Tick a standard off only when the evidence is on file, then run a mock raid to prove it works.

Today

- [ ] **CMP-011** No Deletion of Documents During Raid — Immediate
- [ ] **CMP-002** Dawn-Raid Contact Persons Designated — 24 hours
- [ ] **CMP-006** Contact Sheet Checked & Updated — 24 hours

This week

- [ ] **CMP-004** Contact Persons Displayed at Reception & Gate — 72 hours
- [ ] **CMP-001** Dawn-Raid Procedures Available & Known — 7 days
- [ ] **CMP-005** Conduct During GAC Inspection — 7 days
- [ ] **CMP-010** Cooperation With Authority Searches — 7 days
- [ ] **CMP-013** Responding to Market Share Questions — 7 days
- [ ] **CMP-015** Handling Requests for Electronic Copies — 7 days
- [ ] **CMP-009** Dawn-Raid Procedures Known & Accessible — 72 hours
- [ ] **CMP-003** Dawn-Raid Preparedness Before Inspection — 7 days
- [ ] **CMP-007** Post-Inspection Reporting & Follow-Up — 7 days
- [ ] **CMP-012** Handling Questions Outside Own Knowledge — 7 days
- [ ] **CMP-014** Handling Requests for Document Copies — 7 days
- [ ] **CMP-016** Documents to Copy During Dawn Raid — 7 days

This month

- [ ] **CMP-008** Site Staff Trained on Dawn Raids — 30 days
- [ ] **CMP-017** Competition Law Self-Assessment — 30 days

?/17 Count your passes. A single failure during a real raid can mean **SAR 5 million for obstruction**, and a price-fixing finding can reach **10% of annual sales**.

SOURCES

- Saudi Gazette / Zawya: GAC to file criminal lawsuits against 43 car agents and distributors (2022) · saudigazette.com.sa · zawya.com
- Saudi Gazette: Competition Authority identifies potential violations in the automotive sector (Aug 2023) · saudigazette.com.sa
- Bremer: GAC Board initiates criminal proceedings against 64 businesses (Dec 2023) · bremerlf.com
- GLA & Co: GAC fines 13 firms SAR 36,918,885 for price-fixing (Dec 2025) · glaco.com
- Concurrences / Saudi Gazette: SAR 13M fine on MediServ for withholding information (2023) · concurrences.com
- Gulf News: 4 companies fined SAR 53M (Aug 2020); 3 oilfield firms SAR 5M each (Dec 2020) · gulfnews.com
- White & Case: GAC fines for failure to file merger notification (Feb 2024) · whitecase.com
- Competition Law, Royal Decree M/75 of 29/06/1440H, and Implementing Regulations · gac.gov.sa

Disclaimer. For compliance-audit guidance only; not legal advice. Penalty amounts are statutory maximums. The obstruction penalty follows the checklist's legal reference; confirm against the current Competition Law and Implementing Regulations.

AUDIT SIGN-OFF

DEALERSHIP / SITE	AUDITOR	DATE	SCORE __ / 17

SITE MANAGER SIGNATURE	LEGAL / COMPLIANCE SIGNATURE