CPLATYPUS:D

CMA Fines in Merger Cases: League Tables to 31 October 2025 (ranked highest to lowest for single violation)

	Breaches of Initial Enforcement Orders	Party Fined	Breach committed by	Fine for single violation	Date of Penalty Notice	Summary of Breach
1	**Facebook, Inc. (now Meta Platforms Inc) / Giphy, Inc**	Facebook, Acquirer	Acquirer	**£50,000,000***	20 Oct 2021	Breach 1 of 2. Acquirer significantly limited scope of regular updates outlining its compliance with the IEO. CMA gave multiple warnings and so considered breach to be deliberate. *£50.5m total fines for 2 breaches.
		Meta, Acquirer	Acquirer	**£1,500,000**	04 Feb 2022	Acquirer failing to notify the CMA of key staff resigning and departing the employment of Meta and failing to seek the prior written consent of the CMA in advance of the key staff departing the employment of Meta.
		Facebook, Acquirer	Acquirer	**£500,000***	20 Oct 2021	Breach 2 of 2. Acquirer changed its Chief Compliance Officer on two separate occasions without seeking consent first. *£50.5m total fines for 2 breaches. (3rd breach was not subject to separate fine).
2	**JD Sports Fashion plc / Footasylum plc**	JD Sports Fashion plc, Acquirer	Both	**£4,300,000***	14 Feb 2022	Acquirer did not take steps to actively prevent the disclosure of CSI in breach of the IO; the CSI passed between the parties on at least two occasions; and the acquirer failed to notify the CMA following the meetings. *£4.680m total fine for 3 breaches.
		Footasylum plc, Target	Both	**£380,000***	14 Feb 2022	Target did not take steps to actively and at all times prevent the disclosure of CSI; CSI passed between the parties on at least two occasions; and the target failed to notify the CMA following the meetings. *£4.680m total fine for 3 breaches.
		~~JD Sports, Acquirer Pentland~~	~~Target~~	~~£300,000~~	~~5 Aug 2020~~	Target served a 'break notice' on the lease of one of its 70 retail stores without prior consent. JD Sports and Pentland fined for failure to procure target's compliance with IEO. **Successful appeal. Penalty notice withdrawn prior to hearing.**
3	**Copart / Hills Motors (Breaches 1, 2, and 3)**	Copart, Acquirer	Acquirer	**£1,200,000***	14 Dec 2023	Breach 1 of 3. Acquirer negotiated a "Combined Proposal" with "Insurer 1" before, and 11 months into, an IEO without seeking the CMA's prior written consent. The proposal might have impaired the Copart and Hills Motors businesses from competing independently; Copart failed to take the necessary steps to seperate the business operations of Copart and Hills Motors; and Copart failed to keep the CMA informed of a material development. *£2,500,000 total fine for 3 breaches.
		Copart, Acquirer	Acquirer	**£650,000***	14 Dec 2023	Breach 2 of 3. Acquirer negotiated a "Combined Proposal" with "Insurer 2" shortly before, and 9 months into, an IEO without seeking the CMA's prior written consent. The proposal might have impaired the Copart and Hills Motors businesses from competing independently; Copart failed to take the necessary steps to seperate the business operations of Copart and Hills Motors; and Copart failed to keep the CMA informed of a material development.*£2,500,000 total fine for 3 breaches.
		Copart, Acquirer	Acquirer	**£650,000***	14 Dec 2023	Breach 3 of 3. Acquirer negotiated a "Combined Proposal" with "Insurer 3" after an IEO without seeking the CMA's prior written consent. The proposal might have impaired the Copart and Hills Motors businesses from competing independently; Copart failed to take the necessary steps to seperate the business operations of Copart and Hills Motors; and Copart failed to keep the CMA informed of a material development.*£2,500,000 total fine for 3 breaches.
4	**Theramex / European Rights to Viatris' Femoston and Duphaston products**	Viatris, Seller	Seller	**£1,000,000***	20 Nov 2024	Breach 2 of 2. Seller failed to notify the CMA immediately of the changes to key staff, which it should have known or suspected might amount to a breach of the IEO. *£1,500,000 total fine for 2 breaches.
		Viatris, Seller	Seller	**£500,000***	20 Nov 2024	Breach 1 of 2. Seller implemented changes to key staff associated with the assets subject to the merger without the CMA's prior written consent. *£1,500,000 total fine for 2 breaches.
5	**ION Investment Group / Broadway Technology (Breach 1 of 2)**	ION, Acquirer	Acquirer	**£300,000***	17 Aug 2021	Breach 1 of 2. Acquirer and target continued close collaboration for a customer interaction (though initiated jointly before IEO came into force), target indicated to client that proposal was a joint endeavour, and acquirer failed to communicate IEO effectively within business. *£325,000 total fine for 2 breaches.
6	**PayPal Holdings Inc / iZettle AB**	PayPal, Acquirer	Acquirer	**£250,000**	24 Sep 2019	Parties' cross-selling/joint pilot campaigns (via an IEO derogation limited in scope to non-(potential) UK customers) that inadvertently contacted 76 UK potential customers. Not appealed.
7	**Electro Rent / Test Equip. Asset M. *(Case Nr 2)***	Electro Rent, Acquirer	Acquirer	**£200,000**	15 Feb 2019	Appointing Electro Rent CFO as director of the target business. Not appealed.
8	**Ausurus Group / Metal & Waste Recycling (Breaches 1 and**	Ausurus, Acquirer	Acquirer	**£150,000***	10 Jan 2019	Breach 1 of 2. Directing target's customers to make payments into Ausurus' bank accounts, and making payments to suppliers to target from its accounts. Not appealed. *£300k total fines for 2 breaches.
9		Ausurus, Acquirer	Acquirer	**£150,000***	10 Jan 2019	Breach 2 of 2. Failure to give the target's MD clear delegation of authority to take decisions without consulting or obtaining the permission of acquirer. Not appealed. *£300k total fines for 2 breaches.
10	**Vanilla Group / JLA / Washstation**	Vanilla, Acquirer	Acquirer	**£120,000**	8 Mar 2019	Disposal via sale of all of acquirer's stock of Maytag washing machines (incl. those acquired from the target) back to the former owner of the target. Not appealed.
11	**Nicholls' (Fuel Oils) Ltd / DCC Energy Ltd (Breach 1 of 3)**	Nicholls, Acquirer	Acquirer	**£120,000***	16 Jul 2019	Breach 1 of 3. Moving target's staff to Nicholls premises. Not appealed. *£146k total fines for 3 breaches.
12	**Electro Rent Corp / TEAM *(Case Nr 1)***	Electro Rent, Acquirer	Acquirer	**£100,000**	11 Jun 2018	Terminating the lease over Electro Rent's (i) only UK premises which (ii) formed part of the divestiture package under the CMA merger remedy. **Appealed and lost: Electro Rent v CMA [2019] CAT 4.**
13	**ION Investment Group / Broadway Technology (Breach 2 of 2)**	ION, Acquirer	Acquirer	**£25,000***	17 Aug 2021	Breach 2 of 2. Acquirer delayed disclosure of joint customer interaction for 6 weeks after IEO came into force. Material inaccuracies and/or omissions from disclosure over time period of key events in joint customer interaction. *£325k total fine for 2 breaches.
14	**Nicholls' (Fuel Oils) Ltd (Breaches 2 and 3)**	Nicholls, Acquirer	Acquirer	**£20,000***	16 Jul 2019	Breach 2 of 3. Using a Nicholls-owned/branded mini-tanker and its drivers to deliver to target customers. Not appealed.*£146k total fines for 3 breaches.
15		Nicholls, Acquirer	Acquirer	**£6,000***	16 Jul 2019	Breach 3 of 3. Failing to provide certain IEO compliance statements to the CMA. *£146k total fines for 3 breaches.
	Running total ex withdrawn penalty notices			£60,631,000		
	Statutory maxima	Up to 5% of worldwide turnover.				

	Breaches of Compulsory Information Requests	Party Fined	Breach committed by	Fine for single violation	Date of Penalty Notice	Summary of Breach
1	**Amazon / Deliveroo (Breach 1 of 2)**	Amazon, Acquirer	Acquirer	**£30,000***	7 Sep 2020	Breach 1 of 2. Late production of documents for 2x s109 notices. 177 unique documents responsive to 4 questions in the notices were provided between 3 days and 7 weeks after the deadlines and only after the CMA queried whether responses were complete, including during its main party hearing . *£55k total fine for 2 breaches.
2	**Rentokil Initial plc / MPCL**	Rentokil, Acquirer	Acquirer	**£27,000**	7 Aug 2019	Failure to comply with 3x s109 Notices. "Pattern of errors" that had an adverse impact on the CMA's Phase 1 inquiry including evidence "highly relevant" and "inconsistent with Rentokil's submissions" and but for CMA efforts may have had an outcome-determinative impact that benefitted Rentokil.
3	**Keysight / Spirent**	Keysight, Acquirer	Acquirer	**£25,000**	15 Apr 2025	Failure to comply in full with s109 notice issued on 4 Sep 2024. Keysight initially provided some documents in response to the notice, but after a second notice was issued and Keysight provided further documents, the CMA found that Keysight had failed to produce all the documents required by the first notice within the specified timeframe.
4	**T&L Sugars / Tereos**	Tereos, Target	Target	**£25,000**	25 Sep 2024	Without reasonable excuse, Tereos failed to comply in full with the requirements imposed on it by the notice issued to under section 109 of the Enterprise Act 2002 on 12 April 2024. The notice required the production of certain minutes and internal documents in relation to its board and corporate governance. Tereos failed, without reasonable excuse, to provide a full response.
5	**Copart / Hills Motors**	Copart, Acquirer	Acquirer	**£25,000**	10 Aug 2023	Failure to produce a "cumulatively significant volume" documents in response to a s109 notice that had an adverse impact on the Phase 2 inquiry, CMA's statutory functions (the CMA's ability to assess Copart's compliance with the IEO on a timely basis was emphasised), and third parties.
6	**Amazon / Deliveroo (Breach 2 of 2)**	Amazon, Acquirer	Acquirer	**£25,000***	7 Sep 2020	Breach 2 of 2. Late provision of 12 documents responsive to a s109 notice between 5 weeks and more than 2 months after the deadline, and only in response to a further 3x s109 notices. *£55k total fine for two breaches.
7	**Sabre Corporation / Farelogix**	Sabre, Acquirer	Acquirer	**£20,000**	27 Sep 2019	Failure to produce 188 unique documents responsive to 2x s109 notices until around 2 months after the deadline. Material had incorrectly been withheld/redacted as privileged in the US process, which had governed UK approach.
8	**Just Eat plc / Hungryhouse**	Hungryhouse, Target	Target	**£20,000**	22 Nov 2017	Failure to produce 49 unique documents (incl. key emails between CEO of target topco and investors and key substantive document) that had an adverse impact on the Phase 2 inquiry.
9	**AL-KO Kober Holdings / Bankside Patterson**	AL-KO, Acquirer	Acquirer	**£15,000**	21 May 2019	Production of almost 500 documents over 4 months after s109 deadline; 20 documents c. 1 week late in response to a second s109 deadline, out of approx. 3,000 documents produced in total. "Pattern of errors" and adverse impact on the Phase 2 inquiry (requiring the CMA to extend the statutory timeline).
	Running total			£212,000		
	Statutory maxima	A fixed amount not exceeding £30,000, a daily rate not exceeding £15,000 per day, or a combination of a fixed amount and a daily rate.				