



RECOMMENDATIONS FOR ELECTRONIC DOCUMENT SUBMISSION IN ANTITRUST AND CARTEL PROCEEDINGS¹

updated in August 2019

TOOLS AND ADDRESSES

1. In antitrust and cartel proceedings, electronic communication with the Directorate-General for Competition (DG Competition) is possible via:
 - e-mail to COMP-GREFFE-ANTITRUST@ec.europa.eu: for all case-related correspondence with the Antitrust Registry.
 - [eTrustEx](#): exchange platform for undertakings' submission of sensitive documents in a secure way.
2. Additional tools and e-mail addresses for specific purposes:
 - [eQuestionnaire](#): platform for undertakings replying to requests for information received via this electronic tool.
 - [eLeniency](#): platform for undertakings' submission of information in a secure way in Leniency, Settlement and non-cartel Cooperation cases. The electronic tool emulates the legal protections offered by an oral procedure. Applications for immunity and/or reduction of fines under the Commission's leniency policy can also be submitted via e-mail to COMP-LENIENCY@ec.europa.eu.
 - [Anonymous Whistleblower Tool](#): platform for individuals who wish to submit inside information on possible anti-competitive practices. The tool allows for anonymous two-way communication. Non-anonymous messages can be sent to COMP-WHISTLEBLOWER@ec.europa.eu.

FILE FORMAT AND NAMING OF ANNEXES AND EXHIBITS

3. Electronic submissions must be in a readable, non-corrupted, and non-restricted_format.²
4. Newly created documents (referred to as 'Annexes') must be submitted in PDF machine searchable format. Spreadsheets must be submitted in MS-Excel or Open Office.
5. Pre-existing documents (referred to as 'Exhibits')³ must be submitted in their native format, preserving and including the original metadata.⁴ The Commission accepts all common office automation file formats: Acrobat Reader, MS Office and Open Office. The recommended e-mail

¹ These recommendations do not create any new legal rights or obligations, nor alter the legal rights and obligations which arise from the Treaty on Functioning of the European Union, secondary EU law and the case-law of the Court of Justice of the European Union. This note also does not alter the Commission's interpretative notices and established decisional practice.

² It should be possible to perform optical character recognition (OCR), to machine search, to print and to cut-and-paste. Non-restricted means that no special electronic security settings are activated.

³ Documents that are not specially created for the purposes of the antitrust proceedings at hand.

⁴ These pre-existing files submitted electronically must be an accurate copy of the original document and they must not be converted into PDF for the purposes of the submission. A declaration that a file submitted electronically is a true and complete copy of the original document and that shows the chain of custody of the document may always be requested at any stage in the proceeding.



formats are .msg and .eml⁵. Images (scanned documents or other images containing text) should be provided in PDF machine-searchable format.

6. Annexes and Exhibits must be clearly identified, preferably by means of the prefix ANNEX or EXHIBIT and by use of a continuous numbering throughout subsequent submissions (e.g.: "*Annex 023-Original filename.pdf*"; "*Exhibit 003-Original filename.msg*"). The numbering of Annexes should be independent from the numbering of the Exhibits.
7. It is recommended to submit translations in a language of the proceeding if the pre-existing documents (Exhibits) are in a non-EU language or in none of the procedural languages. Translations, if any, must be clearly separated from the document in the original language and identified by means of the prefix TR. (e.g.: "TR-Exhibit 003-Original filename.pdf/docx").

NON-CONFIDENTIAL VERSIONS

8. Non-confidential versions, if any, must be clearly separated from the original confidential version, identified by means of the prefix NC and provided in PDF format (e.g. : "*NC-Annex 023-Original filename.pdf*" , "*NC-Exhibit003Original filename.pdf*").
9. It is entirely the submitting party's responsibility that non-confidential versions are structured clearly and that redacted information cannot be retrieved ex-post, for instance via forensic software.

RESTRICTIONS

10. E-mails sent to DG Competition should not exceed 15MB. In eTrustEx and eLeniency, individual files must not exceed 100MB and any submission must not exceed 1450 individual files in eTrustEx (respectively 1500 files in eLeniency) and the total maximum size of 4GB in eTrustEx (respectively 4.95 GB in eLeniency). In the Anonymous Whistleblower Tool, the size restriction is 25 MB with a maximum of 10 individual files.
11. Larger submissions can be split into several smaller subsequent submissions.⁶
12. Files must be virus-free (sanitised with an antivirus before submission to avoid any malware or other malicious software).
13. Do not submit any files that are encrypted, password-protected or restricted.⁷ Do not submit executable files, archives (e.g. .zip files or other types of file container) or files containing macros. Avoid any form of embedded files.
14. Do not artificially join files together. For instance, do not combine multiple files in one single PDF or container. Where the pre-existing electronic files are in a container, only the relevant files in that container are to be submitted. If it is not possible to submit any form other than a container, the size of the container should not exceed 500MB.

⁵ Outlook .pst or Lotus Notes .nsf file formats must be avoided. They should be converted into single e-mail formats.

⁶ Alternatively, documents may also be put on external digital devices, such as USB sticks, CDs or DVDs, and sent to DG Competition via post. Floppy disks, magnetic tapes and FTP/cloud servers are not accepted.

⁷ Non-restricted = macro-free, without embedded files and without any special electronic security settings activated.