



**IN THE HIGH COURT OF JUSTICE**

**CR-2019-  
005982**

**BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES**  
**COMPANIES COURT (ChD)**

**Before Deputy Insolvency and Companies Court Judge  
Baister**

**Tuesday the 12<sup>th</sup> Day of November 2019**

**IN THE MATTER OF FOURFRONT GROUP LIMITED,  
FOURFRONT HOLDINGS LIMITED, 360 WORKPLACE LIMITED,  
AREA SQ. LIMITED, SKETCH STUDIOS LIMITED AND THE  
UNITED WORKPLACE LIMITED**

**AND IN THE MATTER OF THE COMPANY DIRECTORS  
DISQUALIFICATION ACT 1986**

**BETWEEN:**

**(1) AKI JOHN PANDELIS STAMATIS**

**(2) SION EMYR DAVIES**

**Claimants**

**and**

**THE COMPETITION AND MARKETS AUTHORITY**

**Defendant**

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**ORDER**

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**UPON THE CLAIM** of the above-named Claimants by Claim Form issued on 6 September 2019 for permission pursuant to section 17 of the Company Directors Disqualification Act 1986 in the case of

the First Claimant to (a) act as a director of, and take part in the management of, Fourfront Group Limited (company number 05733761) ('Group'), Fourfront Holdings Limited (company number 10079456) ('Holdings') and The United Workplace Limited (company number 10492902) ('TUW'), and (b) take part in the management of 360 Workplace Limited (company number 05770083) ('360'), Area Sq. Limited (company number 03874693) ('Area') and Sketch Studios Limited (company number 05719973) ('Sketch'); and in the case of the Second Claimant to act as a director of, and take part in the management of, Area

**AND UPON** disqualification undertakings having been given by the Claimants and accepted by the Defendant on 29 July 2019 for periods of 2 years 9 months, in the case of the First Claimant, and 1 year 6 months, in the case of the Second Claimant, in both cases commencing on 7 October 2019

**AND UPON HEARING** Mr Christopher Buckley, Counsel for the Claimants, and Mr George Bompas QC, Counsel for the Defendant

**AND UPON READING** the evidence

**AND UPON** the Judge having reserved judgment

**IT IS ORDERED** that:

1. Notwithstanding the disqualification undertaking accepted by the Defendant on 29 July 2019, the First Claimant has permission until the handing down of judgment to (a) act as a director of, and take part in the management of, Group and Holdings, and (b) take part in the management of 360, Area and Sketch subject to the following conditions:

- 1.1 the First Claimant shall not act as a director of any other company;
- 1.2 Group, Holdings, 360, Area and Sketch shall not act as directors of any company;
- 1.3 subject to condition 1.4 below, David Rintoul shall remain as a non-executive director of Group and Holdings throughout the period of the First Claimant's disqualification;
- 1.4 with the Defendant's written consent, David Rintoul may be replaced as a non-executive director of Group and/or Holdings. If the Defendant does not consent to David Rintoul's replacement the First Claimant may apply to the court;
- 1.5 throughout the period of the First Claimant's disqualification, David Rintoul, or his replacement, shall:
  - (a) supervise compliance with competition law by Group, Holdings, 360, Area, Sketch and the First Claimant; and
  - (b) report to Mark Scott every quarter and on request, and the CMA on reasonable request with no less than 14 days' notice, on compliance with competition law by Group, Holdings, 360, Area, Sketch and the First Claimant.
- 1.6 the First Claimant shall procure that for staff employed by Group, Holdings, 360, Area and Sketch face to face competition law compliance training is conducted annually for staff in the group identified as high risk in the Fourfront

Group's Compliance Policy - Competition Law and online ethics training, which includes a competition law component, is conducted annually for staff in the group identified as medium risk in the Fourfront Group's Compliance Policy - Competition Law;

1.7 Group shall ensure that throughout the period of the First Claimant's disqualification all email servers within the custody or control of Group, Holdings, 360, Area and Sketch are searched for high risk terms relating to potential competition law breaches at the discretion of, and under the supervision of, David Rintoul or his replacement;

1.8 the First Claimant shall procure that (i) each of Group, 360, Area and Sketch hold minuted monthly board meetings; and (ii) Holdings holds minuted quarterly board meetings, at which the respective company's compliance with competition law and any concerns raised by David Rintoul or his replacement are considered.

**PROVIDED THAT** the permission hereby granted shall cease immediately and without further Order of the Court upon the First Claimant's failure to comply with any of the aforementioned conditions and any permission shall not without further Order be capable of reinstatement by the subsequent fulfilment of the condition.

**SAVE THAT** should the First Claimant issue an application either pursuant to condition 1.4 above or for permission to continue to act prior to or within 7 days of knowledge of the breach of any condition(s), the permission shall continue until the close of the first hearing of such application which shall be listed before an Insolvency and Companies Court Judge in the urgent applications list

no later than 14 days after issuing, subject to further Order of the Court.

2. Notwithstanding the disqualification undertaking accepted by the Defendant on 29 July 2019, the Second Claimant has permission until the handing down of judgment to act as a director of, and take part in the management of, Area subject to the following conditions:

2.1 the Second Claimant shall not act as a director of any other company;

2.2 Area shall not act as a director of any company;

2.3 subject to condition 2.4 below, David Rintoul shall remain as a non-executive director of Area throughout the period of the Second Claimant's disqualification;

2.4 with the Defendant's written consent, David Rintoul may be replaced as a non-executive director of Area. If the Defendant does not consent to David Rintoul's replacement the Second Claimant may apply to the court;

2.5 throughout the period of the Second Claimant's disqualification, David Rintoul, or his replacement, shall:

(a) supervise compliance with competition law by Area and the Second Claimant; and

(b) report to Mark Scott every quarter and on request, and the CMA on reasonable request with no less than 14

days' notice, on compliance with competition law by Area and the Second Claimant;

2.6 the Second Claimant shall procure that for staff employed by Area face to face competition law compliance training is conducted annually for staff in the group identified as high risk in the Fourfront Group's Compliance Policy - Competition Law and online ethics training, which includes a competition law component, is conducted annually for staff in the group identified as medium risk in the Fourfront Group's Compliance Policy - Competition Law;

2.7 Group shall ensure that throughout the period of the Second Claimant's disqualification searches of all email servers within the custody or control of Area are searched for high risk terms relating to potential competition breaches at the discretion of, and under the supervision of, David Rintoul or his replacement;

2.8 the Second Claimant shall procure that Area holds minuted monthly board meetings at which (i) its compliance with competition law, and (ii) any concerns raised by David Rintoul or his replacement are considered.

**PROVIDED THAT** the permission hereby granted shall cease immediately and without further Order of the Court upon the Second Claimant's failure to comply with any of the aforementioned conditions and any permission shall not without further Order be capable of reinstatement by the subsequent fulfilment of the condition.

**SAVE THAT** should the Second Claimant issue an application either pursuant to condition 2.4 above or for permission to continue to act

prior to or within 7 days of knowledge of the breach of any condition(s), the permission shall continue until the close of the first hearing of such application which shall be listed before an Insolvency and Companies Court Judge in the urgent applications list no later than 14 days after issuing, subject to further Order of the Court.

Dated: 12 November 2019.

### **Service of Order**

The Court has provided sealed copies of this Order to the serving party:

Freshfields Bruckhaus Deringer LLP  
65 Fleet Street  
London  
EC4Y 1HS

Ref: 172209-0001/DD