



Chartered Institute of Marketing (CIM)– Response to the CMA’s Consultation on Draft Price Transparency Guidance (CMA209con)

Submitted: 8 September 2025

1. Introduction

The Chartered Institute of Marketing (CIM) welcomes the opportunity to respond to the Competition and Markets Authority (CMA)’s consultation on draft price transparency guidance under the Digital Markets, Competition and Consumers Act 2024 (DMCC Act).

As the world’s leading professional body for marketing, representing over 30,000 members across the world and diverse industry sectors, CIM is committed to championing ethical, responsible, and professional marketing. We believe that clarity in pricing is fundamental to consumer trust, fair competition, and sustainable business growth.

We broadly support the CMA’s draft guidance, noting its balance of clear obligations with practical design suggestions to help businesses comply. However, we believe certain areas could be strengthened to ensure proportionality, sectoral relevance, and practical usability– particularly for SMEs and businesses operating internationally.

2. General Observations

- **Transparency as Brand Leadership**

CIM supports the view that transparency is not just about compliance, but about brand leadership. As **Paul Hitchens, CIM Course Director**, highlights: *“The first brand in a sector to say ‘what you see is what you pay’ isn’t just ticking a legal box, it’s making a brand promise. Maintaining a promise builds trust, loyalty and long-term value in a way that drip pricing never will.”*

- **Championing Transparency as Ethical Marketing**

Transparency in pricing is consistent with CIM’s Code of Conduct and the profession’s ethical responsibilities. It enables brands to differentiate themselves in markets where hidden fees have eroded trust. For example:



- Challenger banks such as **Monzo** have built their reputation on fee clarity and simple language around charges, which has become central to customer trust.
- In **rail ticketing**, retailers that quickly included booking fees upfront avoided consumer complaints and regulatory action, proving the reputational benefit of early compliance.
- The **Oasis ticketing controversy**, where dynamic prices rose steeply without added value, illustrates how lack of transparency undermines trust in high-demand markets

BrandTransparency

- **Operational Readiness**

Dynamic or real-time total price displays may require significant system upgrades. CIM urges the CMA to recognise these challenges, particularly in service sectors, and consider a phased compliance approach.

- **Opportunity for SMEs**

While compliance may appear burdensome, SMEs can also turn transparency into a competitive advantage. As noted in CIM research: *“For small businesses, price transparency is actually an opportunity to distinguish their brand. Customers expect clarity, so if you state the actual price upfront, you can compete on fairness, not just on price.”*

3. Question-by-Question Feedback

Q1. Are the definitions of Invitations to Purchase (ITPs) sufficiently clear?

The definition is broadly clear. To improve certainty, the CMA should provide examples covering emerging channels such as influencer marketing and AI-driven product recommendations.

Q2. Does the guidance appropriately address mandatory vs. optional charges?

We welcome the prohibition on drip pricing but recommend further clarity for subscriptions, tiered service bundles, and dynamic pricing scenarios.

The Oasis “ticketflation” case demonstrates how unexpected surcharges or dynamic increases can alienate consumers.



Q3. Is the requirement for total price presentation (equal prominence) proportionate and practicable?

We agree with the principle, but note that feasibility varies by sector. Retail platforms may implement “floating baskets” easily, but professional services may face greater complexity.

Q4. Are the illustrative examples sufficient?

Additional sector examples should be included:

- Retail & FMCG (delivery and fulfilment fees)
- Travel & Hospitality (resort or luggage charges, where “no surprises” could be a brand differentiator)
- Entertainment & Ticketing (booking and service fees, where early disclosure reduces reputational risk)
- Utilities & Professional Services (tariffs, consultancy packages)

Q5. Does the draft guidance provide adequate direction for different media formats?

Not fully. Further tailoring is needed for short-form and mobile-first channels. For example, a six-second video or Instagram carousel cannot show pricing detail in the same way as a product webpage.

Q6. Are there particular considerations for SMEs?

Yes. SMEs often lack sophisticated e-commerce platforms, but they can use transparency as a differentiator by highlighting “no hidden fees” as part of their brand story.

Q7. Should the CMA align with international standards?

Yes. Many CIM members operate across borders outside of Europe in key international regions such as Africa and the Middle East. Divergence from EU/US standards risks confusion and extra compliance costs. Clear guidance on alignment would provide reassurance.

4. Recommendations

CIM recommends the CMA:



1. Expand examples and case studies, including recent UK market cases (e.g., Monzo, rail ticketing, ticketing controversies).
2. Highlight transparency as a brand advantage, not just a compliance requirement.
3. Develop SME-friendly resources, with phased transition timelines.
4. Provide channel-specific guidance for emerging media.
5. Clarify international alignment to reduce costs for global operators.

5. Conclusion

CIM welcomes the CMA's commitment to improving price transparency. We believe the guidance can not only reduce consumer harm but also raise professional marketing standards by positioning transparency as a brand differentiator.

As one CIM Fellow noted:

"When price equals promise, it builds mental availability and the foundations for loyalty follow."

We look forward to engaging further with the CMA and would be pleased to contribute to workshops or case study development.

ENDS