COMPETITION & ANTITRUST AND TRADE

# CCS Issues Revised Guidelines on Fast Track Procedure with Higher Maximum Discount Effective 1 July 2026

## Executive Summary

Singapore's competition law regime allows for a settlement process, known as the Fast Track Procedure ("**FTP**"), where businesses that are under investigation for competition law violations are permitted to enter into settlement agreements with the Competition and Consumer Commission of Singapore ("**CCS**") by admitting liability.

Following from a public consultation which ran from 27 October 2025 to 17 November 2025, and after incorporating the feedback received, on 19 June 2026, CCS issued the revised CCS Guidelines on the Fast Track Procedure ("**Revised FTP Guidelines**"), and consequential amendments to the CCS Guidelines on the Major Provisions and the CCS Guidelines on Directions and Remedies, each of which will take effect from **1 July 2026**. The Revised FTP Guidelines will supersede and replace the CCS Practice Statement on the Fast Track Procedure for Section 34 and Section 47 Cases, which will be revoked entirely.

This Update summarises the key changes under the Revised FTP Guidelines and some critical insights for businesses arising from the same.

## Key Changes

The Revised FTP Guidelines set out a streamlined FTP for the more efficient resolution of investigations into infringements of sections 34 or 47 of the Competition Act 2004. This is expected to bring administrative benefits to both businesses and CCS, such as procedural efficiencies and resource savings. For businesses in particular, it reduces administrative costs, provides them with a clear and expedient path to closure, and reduces the management time required to address the infringements as well as the operational uncertainties involved.

### *Introducing a Higher Discount*

The Revised FTP Guidelines introduce a higher discount of up to 30% on any financial penalties that may be imposed, for businesses that successfully resolve infringements under the FTP. This is a significant increase from the previous fixed 10% discount that would have been applied. This increase seeks to reflect the higher efficiency and corresponding savings in time, costs and resources that would be achieved through the settlement. For more information on this, please refer to our November 2025 Legal Update on the consultation titled "*CCS Consults on Proposed Changes to Guidelines on Merger Assessment and Settlement Procedures*".

***Clarifying that Applications are Made on a "Without Prejudice" Basis***

The Revised FTP Guidelines clarify that a party's submission of an application to CCS to request the FTP is made on a "*without prejudice*" basis. This change enhances the clarity of CCS's policy intent behind the FTP.

***Introducing FTP Applicability in Cases where No Agreement is Reached***

The Revised FTP Guidelines also clarify that even if not all the relevant parties involved in an infringement matter agree to initiating the FTP, CCS may still proceed with the FTP with those that are prepared to do so. For example, CCS may still consider it to be appropriate to use the FTP if: (i) all businesses which are suspected of having engaged in conduct that infringes section 34 of the Competition Act 2004 agree to participate in the FTP except for one business; and (ii) CCS considers that the objectives of the FTP would still be met.

***Clarifying Submissions that Businesses May Make on Proposed Infringement Decisions***

In addition, the Revised FTP Guidelines provide clearer guidance on the submissions that businesses may make on CCS's proposed infringement decisions. Businesses that wish to make more extensive submissions retain the option to revert to the non-fast track investigatory procedure if they wish, anytime before the signing of the fast track agreement.

***Clarifying the Consequences of an Appeal***

Finally, the Revised FTP Guidelines stipulate at Annex 1 that when signing the fast track agreement, businesses under the FTP shall agree to the following:

1. The fast track agreement is final and binding, and they will not challenge or appeal against any part of the findings or the infringement decision that does not deviate in substance from the agreement.

2. Should any business bring any legal proceedings, including appeals, in respect of the FTP or the infringement decision, then it will have repudiated all the benefits of the fast track agreement and will lose the reduction in financial penalty under the FTP entirely, even if that appeal is subsequently withdrawn. This is because the discount is premised on, among others, procedural efficiencies and resource savings, which would be significantly diminished or fail to materialise if an appeal was lodged.

## Key Insights

Taken together, the amendments present a streamlined and clarified approach which will assist businesses in making more informed decisions with regard to the FTP. In particular, the increased maximum discount available provides businesses with a greater incentive to apply for, or respond to CCS's initiation of, the FTP in appropriate cases. As such, businesses which are considering the FTP in any of their dealings involving CCS are encouraged to familiarise themselves early on with the key changes under the Revised FTP Guidelines.

If you have any queries on the above, please reach out to our team set out on this page.

For regional Competition & Antitrust matters, please see Rajah & Tann Asia's Regional Competition & Antitrust Practice for more information.

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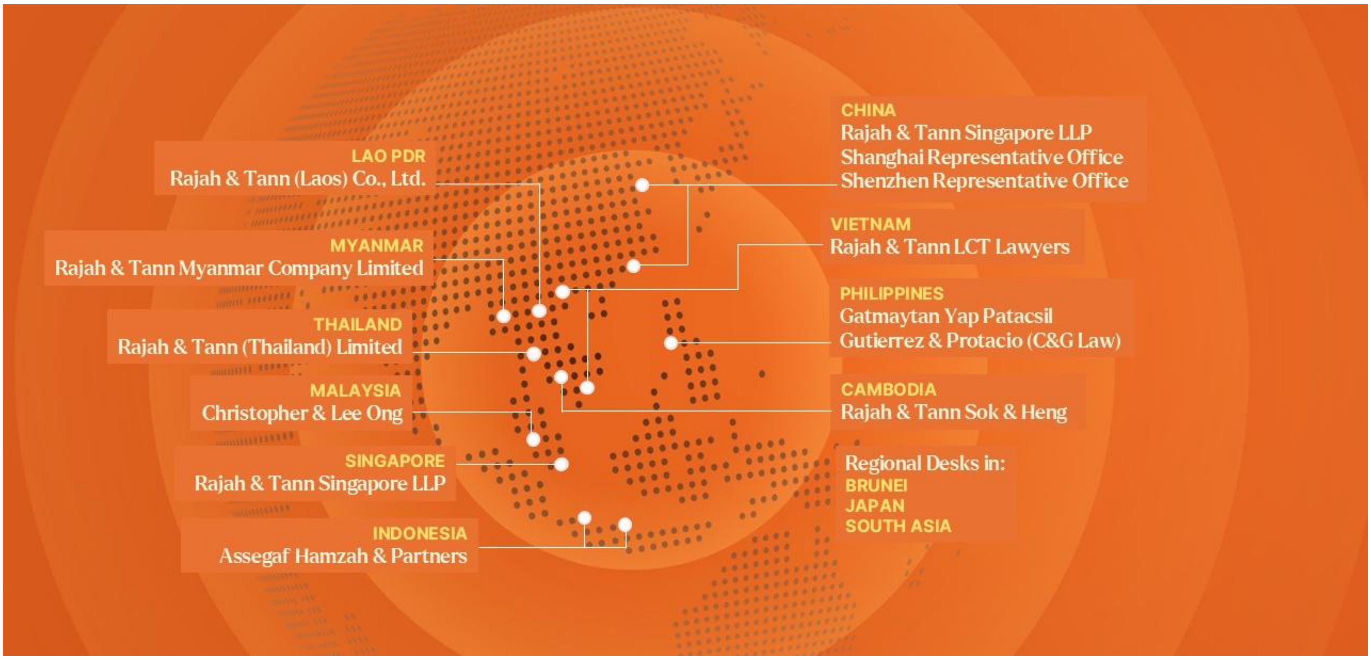


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