Competition Appeal Tribunal Case No. 1720/7/7/25

NOTICE OF A COLLECTIVE PROCEEDINGS ORDER

Advertisers, who are UK-domiciled and who, from 1 January 2011 to* 15 April 2025 *paid for search advertising services provided by Google (whether they purchased directly or via a media agency), could benefit from a collective claim against certain entities in the group of companies known as Google (the top holding company of which is Alphabet).

This notice

This is a legal notice published on the direction of the Competition Appeal Tribunal (the "**Tribunal**") which granted a collective proceedings order on 5 August 2026 (the "**Collective Proceedings Order**") authorising Or Brook Class Representative Limited (the "**Class Representative**") to pursue a collective action against the following companies: (1) Alphabet Inc.; (2) Google LLC; (3) Google Ireland Limited; (4) Google UK Limited; (5) Google Asia Pacific Pte Limited; (6) Google Commerce Limited (collectively, the "**Defendants**"). The Defendants are all part of a single overall undertaking referred to in this Notice as "**Google**".

The Collective Proceedings Order can be viewed online at www.searchadvertisersclaim.co.uk/ along with other information about the proceedings. This notice and the below questions & answers give important information about these collective proceedings. The Tribunal's website is www.catribunal.org.uk.

The proceedings

The Class Representative seeks to recover damages to compensate UK-domiciled Advertisers (as defined below) for harm caused by Google's abuse of its dominance in various of the markets for (i) licensable smart mobile OSs, (ii) Android app stores, (iii) general search services, and (iv) the market for the provision of search engine management services by preventing or dissuading others from competing (effectively or at all) in the general search and search advertising markets, which has driven up prices for, and driven down the value of, search advertising, causing losses to those paying for such advertising.

The Competition Act 1998, as amended by the Consumer Rights Act 2015, allows for such proceedings to be brought on behalf of a group of persons (known as a "class") who are alleged to have suffered losses as a result of anti-competitive conduct. The Tribunal has decided that the proceedings filed by the Class Representative against Google may be brought on a collective basis. Or Brook Class Representative Limited has been approved to act as the Class Representative on behalf of individuals and businesses that it claims have suffered loss due to Google's misconduct.

According to the Class Representative, Google has breached competition law by abusing its dominant position in (at least some of) the aforementioned markets to exclude actual and potential competitors from the general search and search advertising markets, allowing Google to charge supra-competitive prices for search advertisements, and to degrade the quality or value of the advertisements.

The Class Representative seeks damages for losses resulting from Google's abuses of dominance, and its case combines the claims of all UK-domiciled advertisers who, during the Relevant Period (as defined below), used search advertising services provided by Google (the "**Class**"). The **Class Definition** (which determines whether or not a person falls within the Class) is set out below.

No money is available now and there is no guarantee that money will be available in the future. The collective claim will need to be won or settled by the Class Representative before any money can become available.

If you are a member of the Class, you have important legal rights related to these proceedings. Exercising these rights could affect your ability to get a payment in the future (if the case is won or a settlement is reached, and money becomes available). This notice explains the proceedings, who is covered by the proceedings, your rights in relation to the proceedings, how to exercise these rights and any related deadlines. **Please read this notice carefully as your decisions about these proceedings will have legal consequences.**

Your Rights and Options at this Stage

- These are "opt-out" proceedings, meaning that anyone who meets the definition of the Class and who is domiciled in the UK on **5 August 2026** will be included automatically and be bound by the result unless they expressly opt out of the Class so as to formally remove themselves from the proceedings. Therefore, if you are a member of the Class, you are not required to do anything for the time being, and you will be included in the collective proceedings unless you wish to opt out, in which case you should take the steps outlined below.

- If you wish to opt out (i.e., you wish not to be included in the proceedings), you will need to do so by **4pm** on **8 January 2027**. Details of how you can do this are set out below (see Q12). If you opt out, you will not be able to receive any money that the Class Representative may recover on behalf of the Class (i.e., any money it receives in the form of a settlement payment or damages awarded by the Tribunal).

The Class Definition

The Class Definition is: "*All UK-domiciled Advertisers who, during the Relevant Period, paid for search advertising services provided by Google (whether they purchased directly or via a media agency)*"

For the purposes of this definition:

(1) "**Advertiser**":

a. includes all (legal or natural) persons living or existing as at the Domicile Date. It does not include persons that, as at the Domicile Date:

i. in the case of natural persons, are deceased; or

ii. in the case of legal persons, have been dissolved and/or struck off the register and/or otherwise ceased to exist; but

b. does not include media agencies; and

c. does not include the Class Representative itself (or anyone acting for or instructed by the Class Representative).

(2) "**Domicile Date**" is 5 August 2026 at which point all persons who fall within the definition of the Class are domiciled in the UK.

(3) "**Relevant Period**" means the period starting on 1 January 2011 and ending on 15 April 2025.

The Issues

The proceedings will determine certain issues that are common to class members, including:

(1) The definition of the relevant markets.

(2) Whether Google held, and continues to hold, a dominant position on those markets.

(3) Whether Google abused, and continues to abuse its dominant position, including by the alleged exclusionary conduct;

(4) Whether any such abuse of dominance caused members of the class to suffer loss and damage.

(5) The quantification of any aggregate award of damages; and/or

(6) The basis, rate and duration of interest to which members of the Class are entitled.

Any judgment on the common issues will be binding on all members of the Class. If any judgment is given on issues which only concern a sub-class, any judgment on those common issues will be binding on the members of the sub-class.

Anyone who opts out of the proceedings will not be bound by any subsequent judgment in the proceedings.

Questions & Answers

Q1: Why has this notice been issued?

The Tribunal has directed that this notice be issued following the successful application by the Class Representative for the Collective Proceedings Order, which was granted by the Tribunal on **5 August 2026.**

By making the Collective Proceedings Order, the Tribunal authorised the Class Representative to act on behalf of the Class in bringing these proceedings. A summary of the Class Representative's case against Google is on the claims website: www.searchadvertisersclaim.co.uk.

This notice has been issued to inform you of the making of the Collective Proceedings Order, including details of the Collective Proceedings Order and your right to opt out of the proceedings. It informs you of important legal rights you have in relation to the proceedings. Exercising these rights could affect your ability to get a payment in the future (if compensation becomes available). This Notice explains: (i) the proceedings being brought by Or Brook Class Representative Limited; (ii) your rights in relation to the proceedings; (iii) how to exercise those rights; and (iv) any related deadlines.

Q2: What is the Competition Appeal Tribunal?

The Tribunal is a specialist judicial body that covers the whole of the UK and hears certain competition law and regulatory disputes. It has cross-disciplinary expertise in law, economics, business and accountancy. The Tribunal publishes its rules and guidance, together with information about what it does, on its website www.catribunal.org.uk.

Q3: What are Collective proceedings?

Collective proceedings are sometimes described as a class action, a class claim, a group claim or a group action. Simply put, it is a single court action that seeks compensation for lots of similar claims in one go, rather than requiring everyone who may have been wronged by the same legal infringement to bring a separate claim individually. In this type of collective proceedings, a specified person or body (the Class Representative) conducts the proceedings on behalf of multiple claimants (the Class Members). The proceedings are the subject of a CPO, or 'collective proceedings order', which identifies the Class Members whose claims are being pursued, and the Class Representative representing them. It also identifies the issues being tried, and whether the proceedings are on an "opt-in" and/or "opt-out" basis. Collective proceedings can be on an "opt-in" or "opt-out" basis. (See Q8 below for an explanation of "opt in" and "opt out" proceedings and what this means for your proceedings.) In this case, of Or Brook Class Representative Limited is the authorised Class Representative, bringing the action on behalf of the Class on an opt-out basis.

Q4: Who are the proceedings against?

These collective proceedings are against Google. Google is a multinational technology group. It operates the general search engine also known as Google. Google Search allows users to search for information across the internet on their mobile or desktop devices. It works by returning a

set of ranked, curated search results in response to user queries. The Defendants are all members of the Google corporate group:

(a) Alphabet Inc.;

(b) Google LLC;

(c) Google Ireland Limited;

(d) Google UK Limited;

(e) Google Asia Pacific Pte Limited; and

(f) Google Commerce Limited.

Q5: What did the Defendants do wrong?

These collective proceedings are against six companies that form part of the Google group of companies. Those companies play various roles in respect of the operation of Google's general search and search advertising businesses. Google is accused of abusing its dominance in certain of the markets identified above by preventing or dissuading others from competing (effectively or at all) in the general search and search advertising markets, which has driven up prices for, and driven down the value of, search advertising, causing losses to those paying for such advertising.

Google's allegedly anti-competitive conduct include (among other things): (i) Google entering into contracts with mobile phone manufacturers and network operators which required them to pre-install the Google Search and Chrome browser apps on Android devices; (ii) Google paying billions to Apple to ensure that Google is the default search engine on the 'Safari' browser that is pre-installed on all Apple devices, including iPhones; and (iii) Google ensuring that its search engine management tools (SA360) offers better functionality, and more features, when used with Google's own advertising offering than when used with Microsoft's advertising offering.

The Tribunal is also hearing other proceedings concerning Google's practices. In *Stopford v Alphabet Inc.,* CAT case 1606/7/7/23, Nikki Stopford is bringing – as a class representative – a collective action on behalf of consumers also alleging that Google has breached competition law by restricting Google's rivals' ability to compete with Google, which has enabled Google to increase the costs faced by users of Google's search advertising services, Ms Stopford says that those increased costs are then passed on to consumers. An important difference between the *Stopford* proceedings and these proceedings is that Ms Stopford is claiming on behalf of consumers, whereas in this case, Or Brook Class Representative Limited is claiming on behalf of advertisers.

Q6: What is the role of the Class Representative?

The Tribunal has authorised Or Brook Class Representative Limited to act as the Class Representative in these proceedings. As the Class Representative, Or Brook Class Representative Limited will conduct the proceedings against Google on behalf of the Class as defined in the CPO, except for anyone who chooses to opt out of the Class.

During the case, Or Brook Class Representative Limited is responsible for, amongst other things, communicating with the Class and issuing formal notices to its members (such as this

one). Or Brook Class Representative Limited will make decisions on the conduct of the proceedings, including instructing the lawyers and experts; and will evaluate any offer of settlement that Google may make and decide whether to present it for the Tribunal's approval.

Updates about the proceedings will be available on the website (www.searchadvertisersclaim.co.uk) and via various other media.

Q7: Who is the Class Representative?

Or Brook Class Representative Limited is the Class Representative. Its sole director is Dr Or Brook, who is an Associate Professor of competition law at the University of Oxford, and a Fellow and Tutor at Pembroke College. Or has authored and contributed to a significant number of world-leading competition law books and articles, and regularly takes part in policy and impact projects with competition authorities and other international organisations.

She is currently the director of the UK's branch of the International Academic Society for Competition Law. Or is championing the cause for UK advertisers who should have paid less for search advertising services.

Q8: Who is in the Class?

The Class Definition is given above. Anyone who falls within the Class Definition and is domiciled in the UK on 5 August 2026 is a member of the Class. Broadly, the class is made up of all UK-domiciled advertisers who paid for search advertising services provided by Google during the Relevant Period and were UK-domiciled on 5 August 2026.

The Tribunal has authorised the proceedings to proceed on an "opt-out" basis on behalf of all members of the Class. This means that, if you fall within the Class Definition set out above and were domiciled in the UK on 5 August 2026, you are automatically included in the Class unless you take positive steps to opt out. Details as to how you can opt-out are set out under Q12 below.

Q9: Who is excluded from the Class?

As described in the definition of the Class at the top of this notice, if you fall into one of the following categories, you will be excluded from the Class:

(1) natural persons who were deceased on 5 August 2026;

(2) legal persons (companies, LLPs, etc) that had ceased to exist on 5 August 2026;

(3) Media agencies; or

(4) Anyone acting for or instructed by the Class Representative.

Or Book Class Representative Limited has been expressly excluded from the Class.

Q10: Do I need to do anything in order to be part of the proceedings?

If you fall within the Class Definition and are domiciled in the UK on 5 August 2026, you do not have to take any action at this stage in order to be included in the proceedings: you will be included in the proceedings automatically and be bound by the result, unless you opt out (see the response to Q12 below).

All members of the Class who do not opt out will be bound by any judgment on the common issues (which are set out above, under the heading "**The Issues**"). As a member of the Class, you will not be able to bring an individual claim against Google raising the same issues that are included in these proceedings.

Q11: How much money do these collective proceedings ask for?

It is too early to quantify the total value of Or Brook Class Representative Limited's action, as it is anticipated that this will only be possible following disclosure of additional data from Google. However, at this stage, the experts retained by the Class Representative estimate that the value is likely to be up to £5bn. The precise value will become known once the experts are able to analyse data which Google will be obliged to provide at a later stage.

If Or Brook Class Representative Limited is successful (i.e., the proceedings result in Google paying a settlement sum or compensation), all Class Members who have not opted out will be able to seek their share. However, it is important to note that recovery of any money from these proceedings is not guaranteed. The Class Representative will need to prove the case at trial, or secure a collective settlement with Google, in due course.

Q12: Who can opt-out of the proceedings, and how?

Any member of the Class may opt out. By opting out, you will not be able to receive a payment from the proceedings if money becomes available in due course. However, you may be able to bring your own separate claim against the Defendants for the same issues.

If you are considering opting out, you should review the information above and visit both www.searchadvertisersclaim.co.uk/ and www.catribunal.org.uk for information, before deciding.

You can opt out by sending a letter to the Class Representative indicating that you wish to opt out of the proceedings. That letter can be sent by email to optout@searchadvertisersclaim.co.uk or by post to the following address:

Search Advertisers Claim

PO Box 13721

Braintree

CM7 0RJ

Your letter must expressly state that you wish to opt out of the proceedings against Google and you must provide your full name, postal address, country of domicile, email address and telephone number. A template letter is available www.searchadvertisersclaim.co.uk/ containing suggested wording for confirming your decision to opt out.

Letters sent by post must be postmarked no later than **4pm on 8 January 2027**. Likewise, any letters sent by email should be sent by the same date and time. You will be sent an acknowledgment by email to the email address that you have provided, or by post if you have not provided an email address.

If a member of the Class wishes to opt out after 8 January 2027, that member should write directly to the Tribunal to seek approval using the contact details listed below. Under the Tribunal's rules, any request to opt out received after 8 January 2027 will have to be considered by the Tribunal, which will decide whether or not to grant permission for the class member to opt out.

The Registrar
Competition Appeal Tribunal
Salisbury Square House
8 Salisbury Square
London EC4Y 8AP

Email: registry@catribunal.org.uk
Telephone: 020 7979 7979

When writing to the Tribunal you must include the reference of the Competition Appeal Tribunal Case No. 1720/7/7/25.

Q13: Who is funding the proceedings?

Whilst the Class Representative is authorised to run the proceedings on behalf of the Class, it would not be able to fund proceedings of this size and public importance without third-party funding.

The Class Representative has therefore obtained funding for the proceedings from a third-party litigation funder, Burford Capital ("**Burford**"). Burford is an international, multi award-winning firm in the litigation financing and law firm lending market.

Burford has committed up to £40 million to fund all elements of the proceedings, with such amounts to be paid in tranches. In addition, the Class Representative has obtained an indemnity against being ordered to pay the Defendants' costs in the event that the proceedings are ultimately unsuccessful.

Q14: Will I have to pay the legal costs in order to benefit from the proceedings?

No. The funding arrangements in place, described at Q13 above, mean that the Class will not need to pay anything to be part of the proceedings. These funding arrangements also mean that the Class will not be liable for any financial risk should Or Brook Class Representative Limited be unsuccessful.

Q15: How can I stay updated on the progress of the proceedings?

You can visit www.searchadvertisersclaim.co.uk/ and register to receive updates and any future notices via email as the proceedings progress. If, and when, money becomes available, you will be contacted with information on how to claim your share.

This notice summarises the Collective Proceedings Order. To read the full Order and see other information about the proceedings, please visit www.searchadvertisersclaim.co.uk/.