Pricing Practice	Description/ Infringing Conduct	CCCS's Guidelines
Drip Pricing	<ul> <li>This is the practice of displaying/ advertising a product or service at a lower price (headline price) than the final price a consumer would pay.</li> <li>This occurs when the headline price omits mandatory charges and pre-ticked optional add-ons.</li> </ul>	<ul> <li>Include unavoidable or mandatory fees/ charges (eg. taxes, surcharges, service fees) in the total headline price</li> <li>Require consumers to select the options they want (eg. "opt-in" approach for add-ons)</li> <li>If pre-ticked boxes are used, prominently disclose the goods/ services, the price of such items and the material terms and conditions</li> <li>Provide a final itemised price listing, which clearly reflect the breakdown of all mandatory and optional fees prior to payment</li> </ul>
Price Comparison	<ul> <li>Price comparisons are often used with reference to competitors' products to indicate a competitive price and/ or price advantage.</li> <li>Consumers may not actually enjoy a price advantage where the price comparisons are misleading or inaccurate.</li> <li>For example, when a supplier states that its competitor's prices are higher when it is untrue, or price comparisons that are no longer current.</li> </ul>	<ul> <li>Ensure price comparisons are made to other goods or services that are accepted to be similar or equivalent by consumers or trade norms</li> <li>Record reference prices to prove that prices comparisons are not false or misleading</li> <li>Periodically check for changes to referenced price and update accordingly</li> </ul>
Discount	Discounts are benefits arising from a supplier's comparison to its usual price. Consumers may be misled by misrepresentations of the price benefit. This includes suppliers advertising a product as discounted from a price that was never offered; or advertising goods or services as being discounted for a "limited period" when they would actually be discounted for an extended duration.	<ul> <li>Use bona fide previous prices when displaying price comparisons for discounts</li> <li>Record evidence of past sales and prices</li> <li>Clearly and prominently state the time period for discounts. Time period of discounts should not be false or misleading.</li> </ul>
Use of the term "Free"	Suppliers may provide consumers with "free" products or services to entice consumers, though this may not actually be free. Examples of possible infringements are when the supplier makes consumers pay for the cost of a good/ service when represented as "free"; or advertising a product/ service as "free" when it is part of a package price.	<ul> <li>Ensure that price of a product/ service is not increased to cover the cost of the free trial/gift. Clearly indicate any incidental costs (eg. shipping fees for the free gift) at the outset</li> <li>Inform consumers before their free trial ends and provide clear information on the cancellation process</li> </ul>

## Bird & Bird