

7 March 2022

To
The Secretary
The Ministry of Corporate Affairs
(Competition Section),
Shastri Bhawan,
Rajendra Prasad Road,
New Delhi - 110001

Kind attn.: Mr. Injeti Srinivas

Dear Sir

Re:

- (1) THE RENEWAL OF THE "GROUP" DEFINITION NOTIFICATION DATED 4 MARCH 2016, AND
- (2) THE RENEWAL OF THE SMALL TARGET EXEMPTION NOTIFICATION DATED 27 MARCH 2017

The Merger Working Group of the Antitrust Section of the International Bar Association ("**IBA**") hereby encloses for your kind consideration suggestions regarding:

- (1) the renewal of the "Group" definition notification dated 4 March 2016 which lapsed on 3 March 2021, and
- (2) the renewal of the Small Target Exemption notification dated 27 March 2017 which is due to lapse on 28 March 2022

The IBA Antitrust Section would be grateful for your kind consideration of the enclosed suggestions. The co-chairs of the Merger Working Group and the officers of the Antitrust Section of IBA would be delighted to discuss the enclosed submission in more detail, should that be of interest.

Yours faithfully,

Daniel G Swanson / Thomas Janssens

Co-Chairs

Antitrust Section

International Bar Association