

# Black Friday Sale Compliance Checklist

Run your reductions without falling foul of the Omnibus pricing rules

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## Getting Black Friday right

The Omnibus Directive (Dir 2019/2161) sets strict rules for how price reductions are advertised. The core principle is simple: a reduction must be measured against the lowest price you actually charged in the 30 days beforehand. This checklist walks through preparing, running and closing a compliant sale.

This is general guidance, not legal advice. National implementations of the Omnibus rules differ in detail.

## Before the sale: reference prices

The reference price you compare against is the heart of the rules.

- For each product, identify the lowest price applied during the 30 days before the reduction.
- Use that lowest price as the "was" figure, not the usual or recommended retail price.
- Do not raise prices in the run-up to Black Friday to make the discount look larger.
- Record your price history so you can evidence the reference figure later.

## Displaying the reduction

Consumers must be able to see clearly what the reduction really is.

- Show the previous lowest price alongside the reduced price.
- Make sure percentage claims are calculated against that lowest price.
- Avoid vague claims such as "up to 70% off" unless a meaningful range of stock qualifies.
- Keep countdowns and "limited time" messaging truthful.

## Special cases

Some scenarios need extra care.

For progressively increasing discounts, the reference stays the lowest price before the first reduction.

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For goods on sale under 30 days, use the lowest price since they were first offered.

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For loyalty or personalised prices, apply the rules to the general price you advertise.

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## Reviews and testimonials

Sale traffic makes review claims especially sensitive.

State whether reviews are restricted to verified purchasers.

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Explain how you ensure reviews come from genuine buyers.

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Do not suppress or edit negative reviews to lift a sale item.

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Remove any fake or incentivised reviews that are not disclosed.

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## Ranking and search transparency

How you order sale products must be transparent.

Disclose the main parameters determining product ranking.

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Clearly label any sponsored or paid placements.

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Do not present paid placement as an organic "best seller".

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## After the sale

Closing out cleanly protects you if a claim is later challenged.

Keep screenshots or logs of the prices displayed during the sale.

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Retain the 30-day price history that supported each reference price.

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Return prices to their normal level without misleading "sale ending" pressure.

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