

## **CACM's Antitrust Administrative Policy**

CACM has an administrative policy of strict compliance with federal and state antitrust laws. CACM members should avoid discussing certain subjects when they are together – both at formal CACM membership, Board of Directors, committee, and other meetings and in informal contacts with other industry members – and should otherwise adhere strictly to the following guidelines:

- DO NOT discuss prices, fees or rates, or features that can impact (raise, lower or stabilize) prices such as discounts, costs, salaries, terms and conditions of sale, warranties, or profit margins. Note that a price-fixing violation may be inferred from price-related discussions followed by parallel decisions on pricing by association members — even in the absence of an oral or written agreement.
- DO NOT agree with competitors as to uniform terms of sale, warranties or contract provisions.
- DO NOT exchange data concerning fees, prices, production, sales, bids, costs, salaries, customer credit, or other business practices unless the exchange is made pursuant to a well-considered plan that has been approved by CACM's legal counsel.
- DO NOT agree with competitors to divide up customers, markets or territories.
- DO NOT agree with competitors not to deal with certain suppliers or others.
- DO NOT try to prevent a supplier from selling to your competitor(s).
- DO NOT discuss your customers with your competitors.
- DO NOT agree to any association membership restrictions, standard-setting, certification, accreditation, or self-regulation programs without the restrictions or programs having been approved by CACM's legal counsel.
- DO insist that CACM meetings that have agendas are circulated in advance and that minutes, if taken, of all meetings properly reflect the actions taken at the meeting. All CACM meetings generally should have written agendas prepared and circulated in advance.
- DO leave any meeting (formal or informal) where improper subjects are being discussed. Tell everyone why you are leaving.
- DO ensure that only CACM staff sends out all written and electronic correspondence on behalf of CACM and that CACM officers, directors, committee members, or other members do not hold themselves out as speaking or acting with the authority of CACM when they do not, in fact, have such authority.
- DO ensure that if questions arise about the legal aspects of CACM's activities or your individual responsibilities under the antitrust laws, you seek advice and counsel from your own counsel or from the staff and counsel of CACM.

Any questions about CACM's antitrust statement should be directed to CACM's President.