



AntiTrust Compliance Policy

CAGC is committed to operating within the spirit of all federal, state, and applicable international trade regulations and antitrust laws. Activity contrary to this policy is unacceptable, whether in its members, staff, or leadership.

To foster the intent of operating appropriately, CAGC will adhere to the following policy and will publish it to its members, staff, and leaders.

1. All meetings of CAGC's Board, Committees, Task Forces and subsidiary entities will be conducted with agendas distributed in advance. Discussions shall be limited to agenda items, unless the participants agree to an addition. There shall be no substantive discussions of Association matters other than at official meetings, with minutes being distributed to attendees promptly.
2. All association activities, meetings, or discussions will be refrained from which are, or could be construed to be, for the purpose of:
 - a. raising, lowering, or stabilizing prices including, but not limited to, current or future prices, pricing procedures, cash discounts, credit terms, costs, or fair profit or margin levels
 - b. restricting customer or supplier classification, allocation, or selection
 - c. regulating production levels or schedules or concerning production facilities, capacity, or sales volume
 - d. limiting trade via distribution methods or channels
 - e. allocating markets, territories, or customers or control of sales or market share in general
 - f. encouraging boycotts or exclusions of products or services
 - g. fostering unfair trade practices including advertising, merchandising, standardization, certification, accreditation, decisions to quote or not, or encouraging anyone to refrain from competing
 - h. assisting in monopolization, including limiting or excluding anyone from manufacture, sale, or practice
 - i. resulting in illegal brokerage or rebates
 - j. affecting improper reciprocity in dealing
 - k. refusing to deal with a firm because of its pricing or distribution practices
 - l. discussing whether or not the pricing practices of any industry member are unethical or constitute an unfair trade practice
 - m. violating federal, state, or applicable international trade regulations and antitrust laws
3. Association counsel shall receive a copy of the agenda of all meetings in advance, will review minutes of all association meetings, will advise on proposed policies and activities of the Association, and may be in attendance should there be any discussion that could lend itself to requiring clarification of appropriate conversation.



4. All Board, staff, and committee leaders will be apprised of the possible basic areas of anti-trust violation of concern to associations and are responsible for maintaining a basic knowledge and monitoring adherence to the association's anti-trust policy. These include:
 - membership (restrictions, termination, and membership services to nonmembers)
 - business or professional codes and self-regulation
 - statistical programs
 - prices and fees of members
 - cost surveys
 - standardization
 - product certification
 - joint research
 - credit reporting
 - group buying and selling
 - export activities
 - professional credentialing (certification and accreditation)
 - approaches to government.

5. Any member participating in conduct that the Board of Directors, by a two-thirds majority, determines to be contrary to the Association's compliance policy shall be subject to disciplinary measures, up to and including termination. Should a violation be brought to the Board's attention, a procedure of due diligence will be followed including written notification of the matter and an opportunity to respond to the charges and attend a hearing on the matter in person. Termination procedures would be followed as outlined in the Association's bylaws. The President & CEO shall be responsible for implementing disciplinary actions with staff.