RETA ANTITRUST LEGAL GUIDELINES

The members of the Refrigerating Engineers and Technicians Association ("RETA") compete in the marketplace. U.S. antitrust laws at the federal and state levels promote competition and prohibit unlawful restraint of trade. These laws are vigorously enforced to keep companies from engaging in anti-competitive practices. Any discussions among competitors of prices, terms and conditions of sale, sales warranties, allocation of markets or customers, production costs and plans could be interpreted as signaling or tacit agreement leading to collusion. This is serious criminal conduct resulting in fines and jail sentences and treble damages in civil lawsuits.

RETA strictly adheres to the antitrust laws. Each member and company representative bears a serious responsibility at all times to comply with the laws, both at formal meetings and in informal discussions. Think before you speak (or write) – always consider how your remarks could be interpreted – in and out of context. Avoid creating or participating in any situation which could be misinterpreted as noncompliance. And finally, consult legal counsel whenever any uncertainty arises.

GENERAL GUIDELINES FOR ALL ASSOCIATION ACTIVITIES

A. Neither RETA nor any of its committees or activities shall be used for the purpose of bringing about, or attempting to bring about any understanding or agreement among the members with regard to prices, terms or conditions of sale, territories, customers or other aspects of competition.

B. No RETA activity or communication shall include any discussion of pricing methods, terms or conditions of sale, allocation of territories or customers or other aspects of competition. An individual member’s future sales plans should not be revealed, nor should they be discussed.

C. No RETA activity or communication shall include any discussion that might be construed as an attempt to: (i) prevent any business entity from gaining access to any market or customer for its services, (ii) prevent any business entity from obtaining services freely in the market through competition.

D. No RETA activity or communication shall include any discussion that might be construed as an agreement or understanding to refrain from purchasing any materials, equipment, services, or other supplies from any supplier.

E. All RETA meetings shall be conducted in accordance with an agenda, and minutes shall be kept.

F. All RETA members are expected to observe the foregoing rules both at formal meetings and in informal discussions.