



## **Antitrust Policy**

***Adopted: January 6, 2019***

SFPE is committed to strict compliance with federal and state antitrust laws. The antitrust laws are designed to promote free and open competition and to penalize collusive conduct by competing companies that unreasonably lessens business rivalry. It is the responsibility of every member, volunteer, and staff person to be guided by this policy of strict compliance with the antitrust laws in all the Society's activities.

### **1. SOCIETY IMPARTIALITY**

The Society may not play any role in the competitive decisions of its members and how each member independently chooses to compete in the marketplace.

### **2. AVOIDING COLLUSION**

Member interaction through, and participation in, the Society may not be used to reach or facilitate agreements among members that unreasonably restrain competition, in particular:

- Price-Fixing: Agreements on prices of members' products or services;
- Bid-Rigging: Agreements to coordinate bidding on prospective business;
- Market Allocation: Agreements to divide or allocate markets; and
- Group Boycotts: Agreements not to do business with certain suppliers or customers.

### **3. IMPROPER TOPICS AT SOCIETY FUNCTIONS**

The Society meetings, events, forums, discussion groups, networking opportunities, and other member offerings should avoid presentations, discussions, and conversations on topics that are particularly sensitive from an antitrust standpoint. These include:

- Current or future prices of any member's products or services
- Any member's confidential future marketing or business plans
- Allocation of customers or geographic division of markets by members
- Refusal to deal with a company because of its pricing or distribution practices
- Information concerning any member's costs, profits, inventory, market share, or other commercial information of a non-public nature