

## **LP – 5 Antitrust Compliance Policy**

### **Section 1. Policy Statement**

It is the policy of the FAE to comply strictly with the letter and spirit of all federal, state, and applicable international trade regulations and antitrust laws. Any activities of the FAE or FAE-related actions of its staff, officers, Trustees, committee chairs, or committee members that violate these regulations and laws are detrimental to the interests of the FAE and are contrary to FAE policy.

### **Section 2. Implementation**

Implementation of this antitrust compliance policy shall include, but shall not be limited to, the following:

A. FAE Trustee and other committee meetings shall be conducted pursuant to agendas distributed in advance to attendees; discussions shall be limited to agenda items; there shall be no substantive discussions of FAE matters other than at official meetings; and minutes shall be distributed to attendees promptly.

B. All association activities or discussions shall be avoided that might be construed as tending to: (1) raise, lower, or stabilize prices; (2) regulate production; (3) allocate markets; (4) encourage boycotts; (5) foster unfair trade practices; (6) assist in monopolization; or (7) in any way violate federal, state, or applicable international trade regulations and antitrust laws.

C. No officer, Trustee, or committee chair shall make any representation in public or in private, orally or in writing, that states, or appears to state, an official policy or position of the FAE without specific authorization to do so.

D. Legal counsel shall attend all FAE Trustee meetings. Attendance of legal counsel at other meetings shall be at the discretion of the President or Executive Director.

E. FAE Trustees or employees who participate in conduct that the FAE Trustees, by a two-thirds majority vote, determines to be contrary to this antitrust compliance policy shall be subject to disciplinary measures up to, and including, termination of membership on the Trustees, committee, or the FAE itself, or in the case of employees, employment.