

CONCRETE AND MASONRY ANCHOR MANUFACTURERS ASSOCIATION

ANTITRUST AND CONFLICT OF INTEREST POLICY

1. It is the policy of the Concrete and Masonry Anchor Manufacturers Association (the Association) to comply with antitrust laws. Under those laws, competitors are constrained from making agreements or entering into informal understandings among themselves that restrain competition on the price, output, quality or distribution of their products. The responsibility for antitrust compliance within the Association rests with the Association's officers and members.

At meetings of the Association, members should not:

- Discuss with other members or meeting attendees their current or future prices or subjects that could affect prices such as costs or profit margins;
- Discuss with other members or meeting attendees their business operations or plans for proprietary products;
- Discuss with other members or meeting attendees the allocation of customers, markets, or market shares, or limits on production or product lines; or
- Promote Association standards whose sole purpose it is to exclude competition.

Penalties for violating the antitrust laws are severe, subjecting corporations to criminal penalties, as well as civil damage judgments and injunctive decrees. Individuals also are subject to criminal prosecution and may be punished by fines or imprisonment.

It is imperative that officers and members of the Association work conscientiously to avoid any discussion that may have unintended consequences in this regard. Where questions or concerns arise in the course of any discussion conducted as part of the Association's business, the Association's legal counsel should be consulted.

2. Meetings of the Association may include representatives of companies, testing laboratories, and evaluation agencies that compete with one another in the marketplace. Prior to engaging in substantive discussions at any meeting of the Association, representatives should consult with the meeting Chair if they or the organization with which they are affiliated are:
 - Doing business or contemplating doing business with the Association;
 - Involved either as a party or as a consultant in litigation, arbitration or some other form of dispute resolution, the outcome of which could be affected by the Association's action on an issue before it; or
 - Otherwise subject to circumstances that could impair or appear to impair their independent judgment on an issue before the Association.
3. This statement shall be distributed to attendees of Association meetings, and shall be referenced at the commencement of Association meetings as a reminder and as a general guide for the conduct of Association business.