



**Central Michigan Manufacturers Association
General Antitrust Policy
Adopted May 5, 2016**

General

Federal and state antitrust laws are designed to protect and promote competition. They do this by making it illegal for competitors and associations of competitors to fix prices or unreasonably restrain competition. Violations of antitrust laws can be punished with large financial penalties, as well as criminal penalties against involved businesses and individuals. In addition, antitrust violations can severely damage a business' reputation and commercial relationships.

The CMMA is committed to antitrust compliance and expects the same from its members. It is the CMMA's belief that competition is the fairest and most efficient type of economic behavior. Any activity that intentionally or unintentionally reduces competition or restrains trade is contrary to that belief and MMA policy.

Management Responsibilities

It is the CMMA's intention to comply fully with antitrust laws in the conduct of its activities. In addition, the CMMA's management and staff must do everything in their power to ensure that the CMMA and the CMMA's members do not violate antitrust laws while engaged in CMMA-facilitated activities.

Specific management responsibilities include the following:

The CMMA's Board President must periodically review this policy statement with the CMMA Executive Director and the CMMA Board of Directors.

The CMMA's Executive Director must discuss with the Board President or other CMMA Board Member any possible or prospective violations of the antitrust laws.

Meeting Antitrust Requirements

CMMA members must comply with the following requirements when meeting in CMMA's offices, off-site, or by electronic means. If any of these requirements are at risk of being breached during a meeting by inappropriate dialog, participating members should request any such dialog be ceased immediately. If such dialog is not ceased immediately, then the chair of the meeting or the chair at the request of any two participants must immediately suspend the meeting and report the dialog to the CMMA's Executive Director.

These requirements are partial; other types of activity on the part of members may comprise antitrust violations. General questions regarding these requirements should be raised to the Executive Director or a CMMA Board Member. However, it is incumbent upon members to seek the advice of their own legal counsel with respect to specific questions and incidents.

Notice to Members

Requirements regarding your company's or your competitors' products and services:

- *Do not discuss current or future prices.*
- *Do not discuss any increase or decrease in prices.*
- *Do not discuss pricing procedures.*
- *Do not discuss standardizing or stabilizing prices.*
- *Do not ask competitors why a past bid was so low, or to describe the basis for a past bid.*
- *Do not discuss what is a fair profit level.*
- *Do not discuss controlling sales or allocating geographic, product or other markets for any product.*
- *Do not discuss future design or marketing strategies.*
- *Do not discuss credit terms.*
- *Do not discuss banning or otherwise restricting legitimate advertising by competitors.*
- *Do not discuss allocating customers.*

Requirements regarding your company's and/or your competitors' selection of their supplier companies:

- *Do not discuss refusing to deal with a company because of its pricing or distribution practices.*
- *Do not discuss strategies or plans to award business or remove business from a specific company.*

Requirements regarding your company's and/or competitors' trade secrets:

- *Do not discuss trade secrets or confidential information of your company or any other member.*

REMEMBER

Both your company and you as an individual can be prosecuted for violations of antitrust laws.