

Argentum Antitrust Compliance Policy

Argentum has a policy of strict compliance with federal and state antitrust laws. Argentum's members should avoid discussing certain subjects when they are together, both at formal Argentum membership, Board of Directors, committee and other meetings and in informal contacts with other industry members – and should otherwise adhere strictly to the following guidelines:

DO NOT:

- Discuss prices, fees or rates, or features that can impact (raise, lower or stabilize) prices such as discounts, costs, salaries, terms and conditions of sale, warranties, or profit margins. Note that a price-fixing violation may be inferred from price-related discussions followed by parallel decisions on pricing by Argentum members – even in the absence of an oral or written agreement.
- Agree with competitors as to uniform terms of sales, warranties or contract provisions.
- Exchange data concerning fees, prices, production, sales, bids, costs, salaries, customer credit, or other business practices unless the exchange is made pursuant to a well-considered plan that has been approved by Argentum's legal counsel.
- Agree with competitors to divide up customers, markets or territories.
- Agree with competitors to refrain, restrict or limit a business deal with certain suppliers or others.
- Prevent or discourage a supplier from selling to your competitor(s).
- Discuss specific details about your customers, clients or residents with your competitors.
- Agree to any Argentum membership restrictions, standard-setting, certification, accreditation, or self-regulation programs without the restrictions or programs having been approved by Argentum's legal counsel.

DO:

- Insist the Argentum meetings that have agendas are circulated in advance and that minutes of all meeting properly reflect actions taken at the meeting. All Argentum meetings generally should have written agendas prepared and circulated in advance.
- Leave any meeting (formal or informal) where improper subjects are being discussed. Tell everyone why you are leaving.
- Ensure that only Argentum staff sends out all written and electronic correspondence on behalf of Argentum and that Argentum officers, directors, committee members, or other members do not hold themselves out as speaking or acting with the authority of Argentum when they do not, if fact, have such authority.
- Ensure that if questions arise about the legal aspects of Argentum's activities or your individual responsibilities under the antitrust laws, you seek advice and counsel from your own counsel or from the staff and counsel of Argentum.

Any questions about Argentum's antitrust policy should be directed to the Argentum Staff Liaison or Argentum's President/CEO