# Sample Antitrust Policy

**Section 1. Policy**

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

**Section 2. Implementation**

Implementation of the antitrust compliance policy of the Association includes, but is not limited to, the following:

A. **Meetings.** Association membership meetings, and those of the Board of Directors, the Executive Committee, and other committees, are to be conducted pursuant to agendas distributed in advance to attendees; discussions should be limited to agenda items; there should be no substantive discussions of Association matters other than at official meetings; minutes shall be distributed to attendees promptly.

B. **Prohibited Subjects.** All Association activities or discussions shall be avoided that might be construed as tending to (1) raise, lower, or stabilize prices; (2) regulate production or services; (3) allocate markets, customers, clients, or patients; (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. **Authorization.** No officer, director, or member of the Association 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 Association without specific authorization to do so.

E. **Sanctions.** Association members, officers, directors, or employees who participate in conduct that the Board of Directors, by a two-thirds majority vote, determines to be contrary to the Association antitrust compliance policy are subject to disciplinary measures up to, and including, termination.