

## Antitrust Guidelines

1. The Steel Framing Industry Association (SFIA) is a trade association of competing North American steel producers, cold-formed steel manufacturers, connector and component manufacturers, suppliers and distributors, design professional, contractors, and general members.
2. All three North American countries have antitrust laws that prohibit and punish anticompetitive conduct.
3. Anticompetitive conduct consists of agreements or understandings, oral or written, explicit or implicit, with respect to commercial matters such as the production, purchase or sale of goods or services, including prices or other terms or conditions of sale, production capability, production and inventory levels, contract bids, allocation of customers or territories, selection of suppliers and the like.
4. Discussions at SFIA meetings should not relate to (a) the above commercial matters, (b) company-specific proprietary information, including costs of production and strategic plans, such as changes in customer or product market focus or significant technological focus and (c) matters relating to any customer or supplier that might have the effect of influencing the business conduct of any company toward it.
5. Approved SFIA activities, including technical and marketing/market development work programs, are legally proper and do not violate the antitrust laws. Indeed, many SFIA programs enhance competition, which is the goal of the antitrust laws.
6. Informal discussions among company representatives before or after SFIA meetings or during social occasions should be engaged with particular caution.
7. Antitrust authorities can and do place suspected conspirators under oath and force them to disclose all relevant conduct, including what might have been considered private conversations, with felony perjury penalties for failure to testify truthfully. Perjury can be inferred from the totality of the circumstances.
8. Penalties for antitrust violations are imposed on both companies and employees who act for them and include treble damages for companies and jail for individuals in addition to fines. Executives will go to jail.
9. Questions regarding the applicability of the antitrust laws to SFIA activities should be directed to the SFIA General Counsel.