

## **ANTITRUST POLICY STATEMENT**

The Southern Association of Steel Fabricators, Inc., is a regional trade association (“SASF”), organized to serve and advance the steel fabrication industry. Its purpose is to provide, through its technical committees and other activities, a common meeting ground where fabricators, detailers, suppliers, erectors, engineers, academics and others can become informed of current developments in the steel fabrication industry and otherwise advance that industry’s contribution to the general public. SASF is not intended to, and may not, play any role in competitive decisions of its members or their employers, nor in any way restrict competition among participants in the steel fabrication industry.

It shall be the responsibility of every member of SASF to be guided by SASF’s policy of strict compliance with the antitrust laws in all SASF activities. It shall be the special responsibility of committee chairmen, SASF officers and staff to assure that this policy is known and adhered to in the course of activities pursued under their leadership.

To assist the SASF staff and all of its officers, directors and committee chairmen in recognizing situations which may raise the appearance of an antitrust problem, the Board will as a matter of policy furnish to each such person this Antitrust Policy Statement. Should questions arise as to the manner in which the antitrust laws may apply to the activities of SASF or any committee or chapter thereof, such questions shall be directed to SASF’s headquarters and/or its counsel, as appropriate.

Antitrust compliance is the responsibility of every SASF member. Any knowing violation of the SASF general rules of antitrust compliance or with this general policy by an SASF member will result in that person’s immediate suspension from the membership in SASF, and immediate removal from any office held.

### **General Rules of Antitrust Compliance**

The following rules are applicable to all SASF activities and must be observed in all situations and under all circumstances without exception or qualification:

1. Neither the Southern Association of Steel Fabricators, Inc., nor any committee or activity of SASF, shall be used for the purpose of bringing about or attempting to bring about any understanding or agreement, written or oral, formal or informal, express or implied, among competitors with regard to prices, terms or conditions of sale, distribution, volume of production, territories or customers.
2. No SASF activity or communication shall include discussion for any purpose or in any fashion of pricing methods, production quotas, or other limitations on the timing, costs, volume, production, terms of sale, or allocation of territories or customers.
3. No SASF activity or communication shall include any discussion which might be construed as an attempt to prevent any person or business entity from gaining access to any

market or customer for goods or services, or to prevent any business entity from obtaining a supply of goods, or otherwise purchasing goods or services freely in the market.

4. All decisions and recommendations of SASF and its committees which involve standardization of engineering practices or material configuration or composition shall be based upon engineering and scientific evaluation consistently applied. No such decision or recommendation shall be based upon consideration of market advantage to any participant or group of participants in the industry.

5. No SASF activity or communication shall include any discussion which might be construed as an agreement or an understanding to refrain from purchasing any raw materials, equipment, services or other supplies from any supplier.

6. In conducting meetings, the President shall prepare and follow a formal agenda. Minutes of the meeting shall be distributed to all members. Approval of the minutes shall be obtained from the Board or Executive Committee at its next meeting. A copy of the minutes shall be transmitted to the SASF headquarters office, directed to the attention of the Executive Director.

7. Speakers at committee, chapter and other technical SASF meetings shall be informed of the need to comply with SASF's antitrust policy in their presentation.

8. In informal discussions at the site of an SASF meeting, but beyond the control of its President, all members are expected to observe the same standards of personal conduct as are required of the SASF in its compliance with these antitrust guidelines.