

## **ANTITRUST COMPLIANCE POLICY**

This meeting will be held in compliance with the antitrust policy that has been adopted by The Council. In particular, it is important to remember that Council activities will not include any action, express or implied, formal or informal, to:

- (i) collectively raise, lower, stabilize or otherwise affect prices or other competitive terms of insurance products;
- (ii) collectively raise, lower, stabilize or otherwise affect the terms of purchase of any input, including but not limited to compensation or commissions paid to agents or brokers;
- (iii) boycott or refuse to deal with third parties; or
- (iv) allocate product or geographic markets.

## ANTITRUST GUIDELINES

The Council's complete written antitrust policy is available on request. That policy includes the following antitrust guidelines with which The Council complies:

### *General Guidelines*

CIAB, its officers, staff, members and anyone acting on its behalf:

1. Shall not engage in any collective effort to raise, lower, stabilize or otherwise affect prices or other terms of competition;
2. Shall not engage in any collective effort to raise, lower, stabilize or otherwise affect the terms of purchase of any input, including but not limited to compensation or commissions paid to agents or brokers;
3. Shall not suggest or encourage anyone to refrain from doing business with any particular agent, broker, underwriter or other insurance-related entity or groups thereof;
4. Shall not encourage or facilitate any attempt to divide customers, allocate territories or markets, restrict sales volume, or in any way cause an Association member to alter its output of goods and services;
5. Shall not discuss the future pricing intentions of, or competitive terms to be offered by, any particular agent, broker or underwriter; and
6. Shall make its membership open to anyone meeting the criteria set forth in Article III of the Association's bylaws.

### *Survey and Information-Exchange Guidelines*

1. Participation in any information or data collection shall be voluntary;
2. All individual submissions shall be kept strictly confidential;
3. All individual submissions shall be discarded after their incorporation into the intended association report;
4. Any publication of collected data should be in an aggregated form that prevents the identification of member-specific competitive information, including commission levels and strategic planning;
5. CIAB members should not exchange any information that allows them to identify another agent's competitive information, including commission levels and strategic planning; and
6. Information gathered and exchanged should be historical rather than current or projected.

### *Meeting Guidelines*

1. All meetings shall follow an agenda approved in advance by the CIAB General/Legislative Counsel;
2. All meetings shall be followed by published minutes. CIAB General/Legislative Counsel shall review a draft of meeting minutes before releasing them to the membership;
3. Meeting participants shall not discuss the current or future prices or other competitive terms offered by any particular agent, broker or underwriter;
4. Meeting participants shall not discuss any intention or willingness to go along with future price or commission changes;
5. Meeting participants shall not discuss or suggest any form of coordinated reaction to an agent, broker, or underwriter's business initiatives;
6. Meeting participants shall not discuss or suggest willingness to deal with any agent, broker, underwriter, or groups thereof;
7. Meeting participants shall not pressure anyone into adopting any agreed-to business practices;
8. CIAB General/Legislative Counsel or his or her designee shall provide an antitrust-compliance reminder at the beginning of each meeting; and
9. Meeting participants shall not conduct informal sessions, and all discussions shall be conducted in accordance with these guidelines.