



To: ARMA Members and Staff

From: Reed Hitchcock, Executive Vice President

Re: Antitrust Compliance - Quick Reference

The Asphalt Roofing Manufacturers Association (“ARMA” or “Association”) has in effect an Antitrust Compliance Policy (“Policy”). The Policy is intended for the guidance of ARMA member company representatives, officers, directors and staff, when engaged in any activity conducted in the name of, or on behalf of, ARMA. All such persons are expected to be familiar with the Policy and to follow it both in letter and in spirit.

The following cautionary statements are taken from the full Policy and are intended to be used as a quick reference tool. This document is not a substitute for the full Policy, which is available from the Association’s office and with which all are expected to be conversant. At all Association meetings and events, including informal gatherings before, during or following such meetings and events, ARMA members, their representatives and guests will not discuss any of the following competitively sensitive topics:

1. Current or future prices, price levels, costs or profit margins.
2. What is a fair or rational profit level.
3. Actions which could lead to standardizing or stabilizing prices.
4. Pricing or bidding methodologies or procedures.
5. Pricing practices or strategies, including methods, timing or implementation of price changes.
6. Whether or how prices, warranties or other terms of sale are advertised.
7. Cash or any other discounts, rebates, service charges or other terms and conditions of sale.
8. Credit terms.
9. Product warranty terms.
10. Actual, planned or projected production, production capacity or capacity utilization.
11. Projected demand.
12. Confidential company plans for new products.
13. Dividing or allocating geographic or product markets or customers.
14. Whether or on what terms to do business with a supplier, competitor or customer.
15. Whether or on what terms to solicit other companies’ employees for employment.
16. The business practices of individual firms.
17. The validity of any patent or the terms of any patent license.
18. Ongoing litigation, unless being reported upon by ARMA’s General Counsel or discussed appropriately at ARMA’s Counsel Forum.

We hope the above rules will be helpful as you participate in ARMA meetings and other activities. If you have any questions about antitrust compliance, do not hesitate to contact ARMA’s General Counsel:

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