

Association Guidelines on Antitrust Compliance

1. Introduction

The work of the association thrives on the exchange of views among its members. However, it is essential to recognize that discussions involving strategic or confidential business information may violate antitrust laws. To ensure compliance, the following guidelines outline permissible and prohibited topics of discussion within association committees.

2. Permissible Topics of Exchange

Members may freely discuss the following subjects without antitrust concerns:

- **Legal and Regulatory Matters:**
 - Current laws, legislative proposals, and case law.
 - Requirements imposed by supervisory authorities and their implications for members.
- **Association Activities:**
 - Lobbying efforts and related planning.
- **Market and Industry Trends:**
 - General economic, political, and technical developments.
 - Overall market business developments (not individual company performance).

3. Prohibited Topics of Exchange

To prevent antitrust violations, members must **not** discuss:

- **Pricing and Commercial Terms:**
 - Prices, commissions, product conditions, or other market-sensitive data.
- **Relationships with Third Parties:**
 - Agreements (or refusals to cooperate) with suppliers, customers, or competitors.
- **Company-Specific Strategies:**
 - Individual business plans (e.g., product launches, investments, or policy changes), even if they are responses to legal or regulatory developments.

4. Enforcement and Intervention

If discussions inadvertently touch upon competitively sensitive topics, the **Secretariat will intervene immediately**. The Secretariat will:

- Halt the discussion.
- Remind participants of antitrust obligations.

By adhering to these guidelines, the association ensures a compliant and productive environment for collaboration.