

FLORIDA PRESTRESSED CONCRETE ASSOCIATION, INC.
ANTI-TRUST COMPLIANCE POLICIES AND PROCEDURES

It shall be the policy of the Florida Prestressed Concrete Association, Inc. to be in strict compliance to all Federal and State Anti-Trust Rules and Regulations, therefore:

BE IT RESOLVED, That the following are adopted as the Florida Prestressed Concrete Association, Inc. Anti-Trust Policies and Procedures:

1. These policies and procedures apply to all membership, board, committee and other meetings sponsored by the Association, all meetings attended by representatives of the Association and to The Association's employees in all of their activities within the scope of their employment.
2. All meetings of the Association whether membership, board, committee or any other type of meeting sponsored by the Association, shall be conducted as though they were open to the public.
3. Discussions of prices or price levels is prohibited. In addition, no discussion is permitted of any elements of a company's operations which might influence price such as: a. company cost of operations, supplies, labor or services; b. allowance for discounts; c. terms of sale including credit arrangements, and d. profit margins and mark-ups, provided this limitation shall not extend to discussions of methods of operation, maintenance, and similar matters in which cost or efficiency is merely incidental.
4. It is a violation of the anti-trust laws to agree not to compete, therefore, discussion of division of territories or customers or limitations on the nature of business carried on or products sold are not permitted.
5. Boycotts in any form are unlawful. Discussion relating to boycotts is prohibited, including discussions about blacklisting or unfavorable reports about particular companies including their financial situation.
6. It is the Association's policy that all meetings attended by representatives of the Association where discussion can border on an area of anti-trust sensitivity, that the Association's representative request that the discussion be stopped and ask that the request be made a part of the minutes of the meeting being attended. If others continue such discussion, the Association's representative should excuse himself from the meeting at that point and why he left. Any such instances should be reported immediately to the President of the Association and through him a legal counsel so that the matter can be reviewed and a determination be made as to the necessity of further action by the Association.
7. It is the Association's policy that a copy of these Anti-Trust Compliance Procedures and Policies be given to each director, committee member, official representative of member companies and Association employees annually and that the same be read as the first order of business to all members of the membership of the Association.
8. A prepare Agenda will be written and followed at all meetings. Particular attention will be paid to avoiding discussions as outlined in Paragraph 3 heretofore.
9. Formal minutes of all meetings will be written and filed.