

ANTITRUST COMPLIANCE POLICY OF CAHU

It is the policy of the California Association of Health Underwriters to fully comply with the antitrust laws of the United States and the State of California. In order to assure full compliance, the following policies and procedures are to be followed by all employees and members of the Association and by representatives of any members of the Association.

- 1) At any meeting of the membership of the Association or any Committees of the Association or at any meeting where any employee of the Association is present or where the Association is in any way involved, there shall be no discussion of the following:
 - (a) Prices or rates for products or services provided by CAHU members or those within the industry;
 - (b) Changes or proposed changes in the prices or rates of products or services offered to current or potential clients;
 - (c) Formulas, procedures, means for the establishment and determination of prices, rates, discounts, terms and conditions of products or services;
 - (d) Price cutting, pricing too low, or any discussion of prices by individual members at all, or any discussions or any acts, practices or conduct which would in any way ever be construed to constitute a boycott or any attempt to exclude any competitor;
 - (e) Any agreements which any member has with any potential or current clients.

It is the intention of this paragraph to preclude <u>any discussion</u> whatsoever at any meeting or the Association of any meeting where Association personnel are present of any matter relating to <u>prices</u>, <u>rates</u>, <u>discounts</u>, <u>and particular competitive practices</u> of the members of the Association.

- 2) A copy of this Antitrust Compliance Policy is posted on the Association web site.
- 3) At each meeting of the membership, or of any Committee of the membership, the membership shall be reminded by the President of this Antitrust Compliance Program, and that the members shall adhere to its policies both in formal meetings and any informal discussions before, after or during such meetings.
- 4) The President shall periodically review with members of the Executive Committee of the Association this Antitrust Compliance Policy and discuss its effectiveness.