

ANTITRUST COMPLIANCE POLICY

The Aeronautical Repair Station Association (ARSA) shall conduct all its business, meetings and other activities in strict compliance with applicable antitrust laws and regulations of the United States.

Officers, staff, directors and members are directed to adhere to this policy when engaging in any Association activity and to immediately report to the Association's legal counsel, for appropriate advice and action, any proposals, activities or incidents that may violate this antitrust compliance requirement.

Violations of this policy shall include discussions that may lead to anticompetitive agreements regarding

- Future pricing for services provided by ARSA members;
- Boycotts of specific customers;
- Territories of operation;
- Output restraints;
- Terms of sale; or
- Pending bids.

Any violation of this policy is cause for membership expulsion or employment termination. Implementation of the antitrust compliance policy of the Association shall include, but shall not be limited to the following:

- Executive staff shall conduct investigations of potential violations and report relevant findings and recommendations to the Board.
- Legal counsel shall attend Board, the Executive Committee, and such other association meetings as the executive director shall require, for the specific purpose of monitoring antitrust compliance.
- Minutes shall be taken at all Board of Director and Executive Committee meetings and are subject to review by legal counsel immediately upon issuance.
- The association shall make antitrust training available to its members.

Those concerned with ARSA's antitrust policy should contact ARSA Executive Vice President Christian A. Klein at <u>christian.klein@arsa.org</u> or 703.739.9543 x106.

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