**Antitrust Compliance Policy**

Date Established: **February 2010**

Amended: **July 2020**

The Hoof Trimmers Association Inc. is committed to strict compliance with all Federal and State Antitrust laws, rules and regulations. The antitrust laws are designed to promote free and open competition and to penalize any activities that unreasonably lessen business rivalry. These activities include, but are not limited to, agreements among competitors on prices, agreements to boycott third parties, and agreements to divide markets.

Because trade association meetings bring together competitors, any unauthorized discussion of such topics can lead to an inference that an illegal agreement was reached. Accordingly, the following guidelines apply to any meeting or other activity conducted under the auspices of HTA:

* There shall be no discussion of prices, discounts, or other terms and conditions of sale.
* It is a violation of Antitrust laws to agree not to compete, therefore, discussions of division of territories or customers or limitations on the nature of business carried on or products sold are not permitted.
* Boycotts are unlawful. Discussion relating to boycotts is prohibited, including discussions about blacklisting or unfavorable reports about particular companies including their financial situation.
* No discussion is permitted of any elements of a company’s operations which might influence price such as: cost of operations, supplies, labor or services; allowance for discounts; terms of sale including credit arrangements; profit margins and markups.
* There shall be no discussion of agreements to deal exclusively with certain parties, requirements that purchasers of particular products or services purchase other products or services, standard-setting, certification, statistical reporting, or codes of ethics and other self-regulatory activities.
* An HTA representative (board member, member volunteer or staff) shall keep minutes of all meetings and immediately terminate any discussion that may violate these guidelines. Such action to terminate discussions shall be made a part of the minutes of the meeting where the terminated discussion occurred. If individuals continue the discussion, they shall be asked to leave the meeting with a public explanation of why the offending individual/s are dismissed. If the individuals refuse to leave, cease the discussion or the discussion is taken up by other meeting attendees, the meeting will immediately be adjourned with no further business taking place. The reason for the adjournment shall be clearly recorded in the minutes.
* A copy of the Antitrust Compliance Policy is to be given to each officer, director, committee member, and member annually and that the same be read at the opening of all meetings of the membership of the Association.

Severe civil and criminal penalties, including fines and imprisonment, can result from violations of these antitrust laws. Whenever in doubt about how to apply these guidelines, the officers, members, and guests of Hoof Trimmers Association, Inc. should consult its President.