



API Antitrust Guidelines

It is API's policy to comply with the antitrust laws. API staff and member company representatives should observe the following guidance:

- No discussion or forecasting of prices for goods or services provided by or received by a company.
- No sharing or discussing any company's confidential or proprietary information.
- No discussion of a company's specific purchasing plans; merger/divestment plans, production information, inventories or costs.
- No sharing or discussion of specific company compliance cost, unless publicly available.
- No agreement or discussion regarding the purchase or sale of goods or services (such decisions are independent company decisions).
- No discussion of how individual companies intend to respond to potential market/economic scenarios or government action; discussion limited to generalities.
- No disparaging remarks regarding specific vendors, products or services.

If a discussion presents an antitrust issue, raise your concern immediately. If the discussion continues, announce that you are leaving the meeting because you have an antitrust concern, and immediately report your concern to API's Office of the Chief Legal Officer and to your company's own counsel.

For API Standards Development

- Maintain written meeting minutes and obtain advance legal clearance from API for all written presentations.
- Make sure everyone materially affected by an adoption or revision of an API standard has an opportunity to comment.
- Confer with legal counsel beforehand if you believe any antitrust issues could arise.

This Reference is not a comprehensive summary of antitrust issues, nor is it a substitute for legal advice. Antitrust issues should be raised with API's Office of the Chief Legal Officer and/or the member company's own antitrust counsel.