

Antitrust Guidelines for IWFA and EWFA Meetings

The following guidelines are intended to assist speakers and attendees at IWFA and EWFA meetings to avoid antitrust-sensitive topics. Absent prior legal guidance and clearance, there should be no presentation to, discussion concerning, or dissemination of documents to IWFA/EWFA members, whether relating to any particular company or to the window film industry in general, regarding the following subjects:

1. Future, current or recent (*i.e.*, within the last 90 days) prices, price changes, price quotations, pricing policies or philosophies, price differentials, markups, discounts, allowances, etc.
 - a. This applies to any significant element of price, such as freight, credit, warranties, terms and conditions of sale, and the like;
 - b. This applies to any products over which the audience members may have pricing authority control;
2. Future, current or recent (*i.e.*, within the last 90 days) output, capacity, inventory levels or costs (including production, down-time, inventory, distribution or wage, salary or benefits cost);
3. The customers to whom a specific company does or does not sell, the territories in which a specific company does or does not sell, or the product categories which a specific company does or does not sell;
4. Refusal to do business with particular customers, suppliers or competitors, or the suggestion that such a refusal (“boycott”) might be appropriate or desirable;
5. The amount that a specific company pays for goods and services;
6. Business or marketing plans concerning the future production, distribution or marketing of particular products; or any other statistics or data pertaining to a particular company’s business operations.

Legal clearance may be given if the information involved (1) has already been made public in a document which is easily accessed by the public; (2) is historical (at least three months old); or (3) is highly aggregated and not company, geographic, or product specific. For further legal guidance or clearance, please call Peter Boyle, +1 202-508-5831, Darrell Smith, +1 276-632-1084, or Stéphanie Priou +34 638 35 46 50.