

ANTITRUST COMPLIANCE POLICIES AND PROCEDURES

The Central Wisconsin Apartment Association (CWAA) shall strictly comply with all federal and state antitrust laws, rules, and regulations.

Therefore:

1. These policies and procedures apply to all membership, board, committee, and other meetings sponsored by the CWAA, and to all meetings attended by a representative of the CWAA.
2. Discussion of prices or price levels is prohibited. In addition, no discussion is permitted of any elements of a company's operation which might influence price such as:
 - Cost of operations, supplies, labor, or services;
 - Allowance for discounts;
 - Terms of sale including credit arrangements; and,
 - Profit margins and mark ups, provided this limitation shall not extend to discussions of methods of operation, maintenance, and similar matters in which cost or efficiency is merely incidental.
3. Antitrust laws prohibit agreements not to compete. Therefore, discussions of division of territories or customers or limitations on the nature of business carried on or products sold are prohibited.
4. Boycotts in any form are unlawful. Discussions relating to boycotts is prohibited, including discussions about blacklisting or unfavorable reports about particular companies including their financial situation.
5. In all meetings where discussion can border on an area of antitrust sensitivity, the CWAA's representative must request that the discussion be stopped and ask that the request be made a part of the meeting minutes. If others continue such discussion, the CWAA's representative must excuse him-or herself from the meeting. The CWAA's representative must request that the meeting minutes show that he or she left the meeting at that point and why he or she left. Any such instances should be reported immediately to the President and Board members of the CWAA.

A copy of these Antitrust Compliance Policies and Procedures shall be given to each officer, director, committee member, official representative of associate members and CWAA members annually and that the same be read or understood at all meetings of the membership of the Central Wisconsin Apartment Association.