



Antitrust Compliance Guidelines

The American Gas Association and its member companies are committed to full compliance with all laws and regulations, and to maintaining the highest ethical standards in the way we conduct our operations and activities. Our commitment includes strict compliance with federal and state antitrust laws. You bear the ultimate responsibility for assuring that your actions comply with applicable antitrust laws and these Guidelines.

- **DO share these guidelines with attendees at AGA meetings and events**
- **DO consult counsel early on all potential antitrust issues (e.g., data requests, standard setting, information sharing, etc.)**
- **DO consult with counsel on any documents, requests, or non-routine correspondence that potentially raise antitrust concerns.**
- **DO have an agenda for all AGA meetings, and stick to it. Ask counsel to attend meetings where sensitive antitrust subjects might arise.**

- **DO NOT, without prior review by counsel, discuss:**
 - Confidential business matters and competitively sensitive information
 - Prices, discounts, terms of sale, profit margins
 - Allocating markets, energy services, customers, or service territories
 - Whether or not to conduct business with any other company
 - The performance of any specific product, vendor, or service provider
- **DO NOT stay at a meeting or any other gathering where those kinds of discussions are occurring.**
- **DO NOT create any documents that might be misinterpreted to suggest that AGA condones or is involved in anticompetitive behavior.**

Safety Related Issues

Information related to product defects or safety issues that are not an imminent threat and touch on competitive issues or focus on a specific product may be exchanged if based on:

- A notice issued by a federal or state regulator with jurisdiction
- A notice issued by the manufacturer
- Objective, data-driven analysis filed with a regulator with jurisdiction

All safety related communications should be based on observed, objective, replicable data-driven analysis. The affected vendors must be alerted.

Price and Cost Information

Price and cost information may generally be shared if:

- The data is more than 3 months old
- There are at least 5 providers for each statistic and no individual response is more than 25% on a weighted basis, and
- The data is collected by a third-party (e.g., AGA) and sufficiently aggregated so that no individual provider's data is identifiable.

Long-term forecasts and the discussion of general market conditions directed to a public audience are generally acceptable.

Discussion of the cost impact of a proposed regulation in support of advocacy efforts is generally acceptable.

If you have specific questions about these Guidelines or potential antitrust concerns, please contact the AGA Office of General Counsel or your company's legal counsel.