

## **PIMA ANTITRUST STATEMENT**

The Paper Industry Management Association (PIMA) is a professional, not-for-profit society formed specifically for the betterment of its members and the industry of which they are a part. Its prime function is to inform and motivate its members so that they can do a better job, which in turn results in benefits for members, their companies and the paper industry. Its purposes, as stated in its Constitution and Bylaws, are (1) To develop management personnel. (2) To evaluate the practical application of scientific knowledge involving the staff and research components of the industry. (3) To promote the extension and dissemination of practical scientific information relating to the industry.

To attain the above goals, PIMA sponsors a program of continuing education to enable its members to sharpen individual management and operating skills, and at the same time, obtain professional recognition within the industry. This is accomplished through PIMA Divisional Activities, Professional Specialist Group Meetings, Seminar Workshops, National and Divisional Conferences and PIMA Publications.

Through the above-named activities, PIMA brings together representatives in the pulp and paper industry who are or might be competitors. Although PIMA engages in no activity that might result in the restraining of competition among its members or others in any manner, nevertheless the Board of Directors recognizes the possibility that the Association and its activities could be seen by some as an opportunity for anticompetitive conduct. The PIMA Board, therefore, through this statement of policy desires to make it clear that it is unequivocally committed to the principles of competition as prescribed by the antitrust laws and the strict compliance by its members of those laws.

PIMA is a professional society. It is not a trade association. It conducts no statistical or data surveys. It does not engage or involve itself in establishing product or other standards. Its policies prohibit any activity which involves the exchange or collection and dissemination of any information regarding prices, pricing methods or costs of production, sales or distribution.

It is the responsibility of every PIMA member to be guided by PIMA's policy of strict compliance with the antitrust laws in all PIMA activities and meetings. It is the special responsibility of PIMA National and Divisional officers and committee chairmen to ensure that this policy is known and complied with in the course of activities pursued under their leadership.

Antitrust compliance is the responsibility of every PIMA member, and violation of the PIMA Code of Conduct-Antitrust Compliance will be cause for immediate suspension of the violator from membership in the Association. The Association will make available legal advice when questions arise relative to any PIMA activity.

### **CODE OF CONDUCT-ANTITRUST COMPLIANCE**

The following rules are applicable to all PIMA activities on a Divisional or National level. They shall be observed in all situations and under all circumstances without exception.

1. PIMA's Antitrust Statement shall be read to the meeting attendees prior to opening any session.
2. A formal meeting agenda shall be prepared for every committee, Division or National meeting and forwarded to PIMA headquarters for review prior to the meeting. Minutes of such meetings shall not be distributed until they are reviewed by PIMA headquarters.
3. No PIMA activity or meeting shall be used for the purpose of bringing about or attempting to bring about any understanding or agreement among competitors regarding prices, term or conditions of sale, distribution policies, costs or production, territories covered or customers served.
4. No PIMA committee, National or Divisional, shall undertake any activity which involves the exchange or collection of any information regarding prices, pricing methods or costs of production, sales or distribution.

5. No PIMA activity or discussion shall be undertaken which might be construed as an attempt to restrain competition.

6. No person shall be unreasonably excluded from participating in any National or Divisional activity or meeting.

7. Authors of conference papers and other participants at PIMA meetings shall be informed of PIMA's Antitrust Policy and Code of Conduct-Antitrust Compliance and the need to comply therewith in the preparation and presentation of their papers.

8. All members attending any PIMA activity or meeting and engaging in informal conversation at any time are expected to observe the same standard of personal conduct required of all Association in its compliance with Antitrust Policy.

#### ANTITRUST COMPLIANCE REMINDERS FOR DIVISION & COMMITTEE CHAIRMEN

1. Antitrust Policy and Code of Conduct should be reviewed prior to your meeting and the Antitrust Statement shall be read to the attendees prior to opening your session.

2. The agenda for your meeting is due at National Headquarters for review at least 15 days prior to your meeting.

3. Meeting minutes are due at National Headquarters for review prior to distribution and no later than 20 days after the meeting.

4. Stop any meeting discussion which appears to be leading to a discussion of prices or pricing methods, cost of production, sales or distribution or any restraint on competition of any kind.