STATEMENT OF ANTITRUST
COMPLIANCE POLICY AND GUIDELINES

TRANSNATIONAL ALLIANCE TO COMBAT ILLICIT TRADE
TRACIT.ORG

The purpose of this statement is to ensure that the conduct of the Transnational Alliance to Combat Illicit Trade (TRACIT), its staff and its members does not raise antitrust issues in any relevant jurisdiction. It is the obligation of each member and of TRACIT staff and committee members to be familiar with these policies and guidelines and to abide by them.

A. POLICY

It is the policy of TRACIT to govern its activities and to comply fully with the strictest and developed antitrust laws, principally those of the United States and the European Union. TRACIT also acknowledges that multiple jurisdictions in addition to the US and EU have become increasingly vigorous with respect to antitrust enforcement.

This policy is motivated by a firm with respect and belief in the antitrust laws and the recognition of the potentially severe detrimental consequences of antitrust violations. Broadly stated, the basic objective of antitrust laws is to preserve and promote competition. These laws are premised on the assumption that private enterprise and free competition are the most efficient ways to allocate resources, produce goods at the lowest possible price, and assure the production of high-quality products.

B. MEMBERSHIP

Active membership in TRACIT is open to any company or trade association which is substantially engaged in the mitigation of illegal and illicit trading activities and has established a satisfactory business reputation as more fully provided by the Bylaws. Full compliance with antitrust laws is a requirement for TRACIT membership, and responsibility for compliance rests with each member.

C. GUIDELINES FOR TRACIT MEETINGS

Procedures

1. An agenda for all meetings should be prepared in advance, adopted by the group (with any changes) at the outset of a meeting, and carefully adhered to.
2. Minutes of all meetings should be prepared, cleared with the Secretariat office, and circulated to all who attended. They should be approved at the next meeting.
3. In the event of concern regarding potential antitrust implications of a discussion, discussion will be discontinued pending resolution of the matter through the Director-General or legal counsel, if necessary.

Compliance

To comply with antitrust laws, members should not discuss certain subjects when they are together — either at formal meetings or in informal contacts with other industry members.

As such, no competitively sensitive topics, will be discussed during meetings of the members, including discussion of prices, boycotts, market allocation, marketing, trade or commercial practices, information sharing/benchmarking about member companies' costs or commercial activity, and/or restrictions on members of any kind pertaining to commercial activity.

Statement to be read at each meeting

"Every member agrees to abide in full compliance with the letter and spirit of this organization's antitrust compliance policy and guidelines and shall not use membership of TRACIT or any TRACIT meeting or event to circumvent or breach antitrust laws. A member shall at all times abide by and endeavor to secure the widest possible acceptance of these policies and guidelines.

These antitrust policies and guidelines apply to all grades of membership of the Transnational Alliance to Combat Illicit Trade."