



Antitrust Policy

The American Oil Chemists' Society (the "Society") intends to strictly comply with the antitrust laws of the United States, all state governments, and any other relevant governing authority (the "Antitrust Laws"), and in furtherance of this intention, proclaims the following Antitrust Policy:

I. The Society shall not be used in a manner which violates the Antitrust Laws, and members of the Society, in their capacity as representatives of the Society, shall not tolerate, encourage or participate in any activity which could reasonably be expected to result in a violation of the Antitrust Laws.

II. This policy shall apply to all membership, board, committee and other meetings of the Society, and all events attended by individual members of the Society in their capacity as representatives of the Society.

III. The Society recognizes that the Antitrust Laws make certain activities between industry participants unlawful, and the Society expressly prohibits participation in such activities at any event which the Society holds or sponsors, or by any member of the Society at any event in which such member participates as a representative of the Society. Such prohibited activities include the following:

- a. Non-competition, territorial division, or operationally restrictive agreements;
- b. Boycotting, blacklisting, or unfavorable reporting; or
- c. Discussion of these and other prohibited matters, including the following:
 - i. Price, price fixing, price calculation, or price changes;
 - ii. Costs;
 - iii. Terms or conditions of sales;
 - iv. Quote decisions;
 - v. Discounts;
 - vi. Product or service offerings; or
 - vii. Production or sales volume, capacity or plans.

IV. In the course of any event in which activities or discussion threatens to border on a prohibited matter, any member, officer, director, employee or representative of the Society present at such event in such capacity shall request that the activity or discussion be terminated immediately, and if such termination does not immediately occur, such person shall seek recordation of the problem if appropriate, shall cease all participation in the event, and shall report the matter to the Society at the earliest possible opportunity.

V. A copy of this Antitrust Policy shall be given at least annually to each officer, director, member, representative, or employee of the Society, or any other party participating in the Society, and the Antitrust Policy shall be readily available at all membership meetings.