

ALIA Antitrust Compliance Guidelines For Meetings

Communications with the Asian Lubricants Industry Association and information provided to ALIA subcommittees will not generally be treated as confidential, since these communications serve in part as the basis for ALIA business. ALIA meetings are open to all invited members and parties. By attending and participating, you agree:

- (1) To fully comply with ALIA's policies and procedures, governing standards and antitrust;
- (2) You will not provide any material that will violate the rights of any third parties, including, but not limited to, patents, copyrights, trade secrets, and trademarks;
- (3) To disclose the existence of any patented materials that you provide; and
- (4) You will not make audio or video recordings of ALIA meetings without the consent of all persons being recorded.

Participants should observe the following guidelines:

- (1) Avoid any discussions or conduct that might violate the antitrust laws or raise an appearance of impropriety;
- (2) At meetings, limit discussions and materials to agenda topics, unless additional topics and materials have been approved;
- (3) No discussion regarding prices of particular products or services of a company or forecasting of prices for goods or services;
- (4) No discussion of any company's confidential information, including purchasing plans for particular products or services, merger/divestment plans, market allocation, development plans, inventories and costs (only publicly available information should be discussed or shared);
- (5) No sharing or discussion of non-public company compliance issues;
- (6) Any discussion regarding potential energy or economic scenarios that may arise must be limited to generalities. No discussion of how individual companies intend to respond to economic scenarios or government action;
- (7) There shall be no agreement or discussion regarding the purchase or sale of a product or service – purchasing and selling decisions are independent company decisions;
- (8) Individual companies may share fact-based experiences and relevant technical information, but should not make explicit recommendations for or denunciations of a vendor at meetings. Where not absolutely necessary, product or company names should be avoided in discussions.