

Antitrust Guidelines

Wireless Infrastructure Association (“WIA”) and its members are committed to full compliance with all laws and regulations, including the antitrust laws, and to maintaining the highest ethical standards in their activities. The Guidelines below are designed to help you avoid even the appearance of impropriety in your participation in WIA meetings and activities. In the absence of specific legal advice to the contrary, you should strictly adhere to these Guidelines.

1. **Do** use an agenda and take accurate minutes at every meeting. Where sensitive antitrust subjects may arise, have counsel review the agenda and minutes before they are put into final form and circulated and request that counsel attend meetings.
2. **Do not** discuss with other member companies, whether in private or at meetings:
 - a. your own or a competitor’s current or future pricing;
 - b. anything that may affect prices, including:
 - i. costs,
 - ii. discounts,
 - iii. terms of contracts with customers or suppliers, or
 - iv. purchase, credit, or profit margins, including what constitutes a “fair” profit margin;
 - c. the prices your customers should charge for their products;
 - d. allocating or dividing markets, customers, territories, or products;
 - e. your own or a competitor’s current or future production, output, disruptions, or downtime;
 - f. your own or a competitor’s current or future business or marketing plans;
 - g. supplier or customer disputes or complaints or suggest collaborating to punish, harm, or boycott a supplier or customer; or
 - h. any other competitively sensitive information.
3. **Do not** stay at a meeting or other gathering where such inappropriate talk occurs.
4. **Do not** make public announcements or statements about your own prices or those of competitors at WIA functions.

The above Guidelines apply to both official WIA and committee meetings, as well as informal gatherings surrounding those meetings. Should an improper discussion take place, you should immediately protest, and if the improper discussion continues, remove yourself from the situation. Note that these Guidelines do not deal with every context in which a disallowed discussion may occur. If there is any doubt as to whether a subject matter may be improper, you should refrain from that discussion until you can consult with counsel.