

GLOBAL FEDERATION OF BLACK SPEAKERS, INC

Antitrust Compliance Policy

Statement of Policy

The policy of the Global Federation of Black Speakers, Inc., also doing business as “BlackNSA” is to comply strictly in all respects with all federal, state and local laws, including the antitrust laws. It is expected that all members and staff involved in BlackNSA activities will be sensitive to the unique antitrust issues raised by associations and, accordingly, will take all steps necessary to comply with applicable antitrust laws.

Antitrust Statutes

The principal federal antitrust and competition laws are the Sherman Act, the Clayton Act, the Robinson-Patman Act and the Federal Trade Commission Act.

- The Sherman Act prohibits “every contract, combination . . . or conspiracy” which unreasonably restrains trade, as well as monopolizing, attempting to monopolize, or conspiring to monopolize any part of trade or commerce.
- The Clayton Act prohibits exclusive dealing and “tying” arrangements, as well as corporate mergers or acquisitions which may tend substantially to lessen competition.
- The Robinson-Patman Act prohibits a seller of goods from discriminating in price between different buyers when the discrimination adversely affects competition. It also prohibits purchasers of goods from soliciting and receiving discriminatory prices from suppliers. This statute applies only to sales of commodities; it does not cover sales of services or intangibles.
- The Federal Trade Commission Act prohibits “unfair methods of competition” and “unfair or deceptive acts or practices” in or affecting commerce.

Violations of the antitrust laws can have very serious consequences for BlackNSA, its members and their employees, including criminal and civil penalties.

Compliance

The activities of the Association unavoidably bring together members who are competitors. The interaction between competitors which necessarily takes place in the context of BlackNSA activities is strictly regulated by the antitrust laws of the United States which have as their principal purpose the fostering of competition in the marketplace. The Association may not play any role in the competitive decisions of its members, nor in any way restrict competition among members or potential members. Rather, it serves as a forum for a free and open discussion of diverse opinions without in any way attempting to encourage or sanction any particular business practice.

BlackNSA provides a forum for exchange of ideas in a variety of settings including its annual conference, educational programs, committee meetings, and Board meetings. To ensure that the Association and its members comply with antitrust laws, the following subjects should never be discussed at meetings of the Association's members, directors or committees:

1. Past, present or future prices.
2. Fair, desirable or target profit levels.
3. Profession or individual pricing policies, changes or standardization.
4. Credit or discount terms.
5. Allocation of clients or markets.
6. Whether a competitor's prices constitute unfair competition.
7. Wage rates.
8. Whether or on what terms to do business with a supplier, client or competitor.
9. Whether or on what terms to solicit others' employees for employment.
10. Discouraging entry of any party into or competition in any segment of the market.
11. Restricting advertising or solicitation that is not false or misleading.

Minutes will be prepared after Board meetings to provide a concise summary of important matters discussed and actions taken or conclusions reached. Any written materials to be distributed at BlackNSA meetings must be reviewed and approved in advance.

All participants are expected to observe the same standards of conduct as are required by this Antitrust Compliance Policy at all BlackNSA meetings.