



ANTITRUST POLICY STATEMENT AND GENERAL GUIDELINES
FOR ANTITRUST COMPLIANCE FOR THE
PACIFIC CLAIM EXECUTIVES ASSOCIATION

It is the policy of the Pacific Claim Executives Association (“PCEA”) that all of its activities shall be conducted in compliance with all federal and state antitrust laws. All of the business meetings and other affairs shall be conducted in strict compliance with applicable antitrust laws and trade regulations. PCEA shall not participate in, permit, condone or promote any actions taken by its members on behalf of PCEA or its representatives, that restrict trade, increase or fix prices, prevent competition or in any other way or adversely affect the ability of any company, firm or individual to participate in the PCEA or to compete in this industry.

It is not the intention of PCEA to provide a forum for standardizing products or rates, current or future pricing, charges, credit terms, or for dividing markets or fixing profit levels for selecting or excluding competitors or suppliers.

Officers, staff, directors and members of PCEA are directed to adhere to this policy when engaging in any PCEA activity and to immediately report to and consult with PCEA’s legal counsel for appropriate advice and action regarding any proposals, communications, activities or incidents that may violate this antitrust policy. Any violation of the PCEA Antitrust Policy Statement is contrary to PCEA’s policy and is cause for expulsion, suspension, termination or similar action.

By membership in PCEA, or by attendance at any of its meetings or conferences, each member agrees to follow the letter and the spirit of all applicable antitrust laws and regulations.

PCEA GUIDELINES FOR ANTITRUST COMPLIANCE

PCEA is a Public Benefit Corporation (not-for-profit) organized to serve the insurance industry with information on insurance issues. PCEA is not intended to, and shall not, play any role in the competitive decisions of its member companies or their employees, and PCEA shall not in any way restrict competition between or among its members or non-members.

In particular, PCEA and its committees, directors, officers, employees and members

SHALL NOT:

- Discuss competitively sensitive insurance company practices;

- Discuss or disclose individual company or member practices, pricing methods, premiums, rates, rate levels, allocations, territories or markets, underwriting standards, market entry or withdrawals, commissions, coverages or customers;

- Engage in discussions or communications that might be construed as an agreement or understanding to refuse or refrain from using any certain vendors, companies, agents, brokers, suppliers or products, or from dealing with any company, business, individual or customer;



- Discuss prices, pricing formulas, product plans, or marketing plans.

Consistent with its goals, PCEA and its members may discuss various insurance industry related procedures and policies, but they may not refuse to deal with or impose sanctions on companies that do not implement a particular standard that is discussed, adopted or endorsed by PCEA.

PCEA and its members may discuss and take positions on insurance-related legislation and regulation, but members may not discuss their market response in reaction to passage of, or the failure to pass, new laws, or regulations. Nor should any member threaten market withdrawal or underwriting restrictions in order to induce the passage or defeat of favorable laws or regulations. Members may, however, discuss the impact that legislative or regulatory change might have on business operations and the consequent general effects on the availability and affordability of insurance.

In addition, PCEA and its members, directors, officers, and employees must strictly observe the following:

- Do not give or listen to speeches or announcements, or participate in any discussions, encouraging coordinated behavior in order to maintain prices, profit margins or stability in the industry.
- Do not attend formal meetings where standard meeting procedures are not followed or where there is no fixed agenda.
- Do not discuss matters of industry concern at informal meetings, such as impromptu meetings at a hotel, restaurant, bar or the like, after the formal meetings have concluded.

This Antitrust Policy Statement and General Guidelines shall appear in each PCEA meeting program and be explained to the membership at such meetings by monitoring counsel attending for the purpose of ensuring compliance with the statement and guidelines.