# **CIELFFA**

## COMITÉ INTERNATIONAL D'ÉTUDE DU LAMINAGE À FROID DU FEUILLARD D'ACIER

## Compliance guidelines for association activities

These guidelines follow a recommendation from Wirtschaftsverband Stahl- und Metallverarbeitung e.V., 15.3.2007. They are designed to ensure the detection and avoidance of antitrust critical behaviour or even direct violations of antitrust law. CIELFFA and its members shall ensure that these guidelines apply to associational practice, especially in meetings of the economic committee.

## 1. Exchange of Views and Experiences

Members shall not exchange information or reach agreements, that could lead towards a restriction of competition between members, especially concerning

- Individual sales prices (including price components), price strategy and other factors with price relevance such as individual terms and conditions of sale and delivery, discounts, payment terms.
- Individual delivery costs, costs of production and distribution costs
- Allocation of production volume
- Allocation of market shares (by allocating products and/or geographical areas)

#### 2. Market Information Systems

CIELFFA collects statistical data from and distributes statistical data from and to its member companies. CIELFFA makes this information available to the members in an aggregated manner. CIELFFA ensures that no conclusions on individual data or market behaviour of member companies can be drawn from this aggregated information until at least one year has elapsed.

### 3. Trade Association Recommendations

CIELFFA will not encourage or facilitate coordinated market behaviour of its members that could constitute an antitrust infringement or evade antitrust law. CIELFFA will not encourage or facilitate boycotting other companies or associations.

04. November 2010