

**ANTITRUST POLICY STATEMENT**  
**AND**  
**GENERAL GUIDELINES FOR ANTITRUST COMPLIANCE**  
**FOR THE**  
**INSURANCE COLLECTION EXECUTIVES**

It is the policy of the Insurance Collection Executives (“ICE”) 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 the applicable antitrust laws and trade regulations. ICE shall not participate in, permit, condone or promote any actions taken by its members on behalf of ICE, employees or representatives, that restrict trade, increase or fix prices, prevent competition or in any other way adversely affect the ability of any company, firm or individual to participate in the ICE or to compete in this industry.

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

Officers, staff, directors and members of ICE are directed to adhere to this policy when engaging in any ICE activity and to immediately report to ICE’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 ICE Antitrust Policy Statement is contrary to ICE's policy and is cause for expulsion, suspension, termination or similar action.

By membership in ICE, 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.

### **ICE GUIDELINES FOR ANTITRUST COMPLIANCE**

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

In particular, ICE and its committees, directors, officers, employees and members **SHALL NOT**:

- Discuss competitively sensitive insurance company practices that have no bearing on credit or collection within the insurance industry;
- 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, ICE and its members may discuss voluntary credit and collections 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 ICE.

ICE and, its members may discuss and take positions on credit and collection-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 finance, credit and collection, and the consequent general effects on insurance or credit availability and affordability.

In addition, ICE 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 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.