



Policy Executive Summary & Primer

Policy Title and Number:	<i>Antitrust Policy</i>	CORE-LC-006.2
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This executive summary document is intended only to provide an overview of the information contained within the policy. In no way does this document replace or supersede the content of the policy.

Executive Summary

- The Antitrust Policy (“Policy”) provides guidance regarding compliance with federal and state antitrust laws.
- Activity or conduct that reduces or eliminates free enterprise competition may be considered an antitrust violation. Violations can result in substantial civil and criminal liability penalties.
- This policy applies to Company employees, agents, and independent contractors.

Key Policy Requirements

- The Company may not:
 - Enter into agreements to fix prices or rig bids.
 - Share price or billing information with competitors.
 - Enter into boycotts or exclusive dealing and price discrimination agreements.
 - Engage in unfair trade practices.
- Company employees, agents and independent contractors may not attend or participate in meetings, discussion, agreements or understandings with competitors relating to:
 - Prices or terms offered, or to be offered, to customers.
 - Allocation or division of customers, territories or markets, or the availability of products or services.
 - A boycott or refusal to deal with third parties.
- The Company will not agree with competitors to exclude existing or potential patients, suppliers or competitors from business deals.
- Mutual understandings that relate to the price or terms and conditions of a current or future sale or transaction are illegal and prohibited.
- Company employees, independent contractors, and agents should report actual or suspected antitrust violations to Compliance or Legal.
- The Compliance Officer will investigate reported violations and take actions to prevent reoccurrence.