



MEDTECH ASSOCIATION, INC.

ANTITRUST POLICY

MedTech is a regional trade association comprised of Upstate New York technology manufacturers, research institutions, allied professional services and economic development organizations with shared interests in collaboratively developing technologies, products and services for the global medical products marketplace. Our member companies operate in a highly competitive marketplace, and are committed to ethical principles and compliance with applicable laws. As part of that commitment, member companies must know and follow the letter and spirit of the antitrust laws. MedTech strongly endorses that commitment.

Antitrust laws, both state and federal, are complex, vigorously enforced, and carry severe penalties for violation. They prohibit agreements among competitors that may fix or stabilize prices, rig bids, limit production or output, or divide up customers, territories or markets. They also prohibit agreements on group boycotts. Individual violators of antitrust laws can face penalties including fines and imprisonment. Companies may be subject to large fines, penalties and treble damage awards. Violations can mean loss of the ability to perform any government contract work.

Because antitrust laws cover a broad range of conduct, it is the policy of MedTech not to discuss—whether before, during or after meetings—prices, discounts, terms and conditions of sale, territorial or customer allocations, profits, returns on investment, markets, customers, costs and other factors that affect competition. If there is ever any doubt or question about the priority of what is being discussed, we agree that we will immediately stop the discussion and seek appropriate legal advice. Each member will agree and it will be reaffirmed before the commencement of each meeting that no member of MedTech will take part in any anti-competitive conduct or discussion.