



Antitrust Compliance Policy Statement

Comprehensive Care Connections' (C3) policy is to comply fully and strictly with both federal and state antitrust laws.

C3's policy is motivated by a firm respect and belief in the antitrust laws and the free market philosophy underlying these laws as well as by recognition of the potentially severe detrimental consequences of antitrust violations. Our aim is to conduct all interactions in such a way as to avoid any potential for antitrust exposure in the first instance.

Full compliance with the antitrust laws is a requirement for C3 and responsibility for compliance rests with each service-offering C3 member and non-member participating organization.

In order to comply with all antitrust laws, C3 participating organizations, as potential market competitors, should not discuss certain subjects when they are together — either at formal meetings or in informal contacts with other industry members.

Topics to avoid discussing with competitors include: prices, price trends, timing of price changes, costs of common inputs, margins, terms of sale, discounts and rebates, advertised prices, promotional programs, inventory levels, production levels, capacities, new products or projects, and the like.

Further, with rare exceptions that should be made only upon the advice of counsel, service-offering C3 participating organizations are prohibited from the following interactions with other service-offering C3 participating organizations:

- Fixing or setting prices for selling products or services;
- Allocating geographic markets or customers between or among competitors;
- Bid rigging, bid rotation, or otherwise distorting the bid process;
- Boycotting customers or vendors;
- Agreeing upon levels of production or output;
- Conspiring to exclude competitors or customers from the market; and
- Discussing specific R&D, sales or marketing plans, or any company's confidential product, development, or production strategies.

C3 participants have an obligation to terminate any discussion, seek legal counsel's advice, or, if necessary, terminate any meeting if the discussion might be construed to raise any antitrust risks.

Notwithstanding the above restrictions, as a management services organization, C3 shall enter into discussions and contracts with C3 participant organizations as needed to ensure the successful execution of its obligations under C3 proposals and contracts.