



WASHINGTON REFUSE & RECYCLING ASSOCIATION

WASHINGTON REFUSE & RECYCLING ASSOCIATION ANTITRUST POLICY

October 14, 2025

Group activities of competitors or potential competitors are inherently suspect under the antitrust laws. Many agreements among competitors, however, are both legal and beneficial to the industry. The best means for enjoying the benefits of permitted agreements among competitors while avoiding the pitfalls of illegal agreements is by belonging to a trade association like Washington Refuse and Recycling Association.

It is the policy of Washington Refuse and Recycling Association to comply strictly with the antitrust laws. Washington Refuse and Recycling Association will not knowingly permit discussions of individual company non-regulated prices or the related types of sensitive information listed below. Statistical reporting by the Washington Refuse and Recycling Association is for clearly defined and stated permissible purposes, not to restrain competition. Participation will always be voluntary, and the statistics will relate to past transactions and be reported in the aggregate. The development of any guidelines or standards in which Washington Refuse and Recycling Association participates will be open to wide participation by affected parties, and adherence to the guidelines or standards will be strictly voluntary. In conducting any collective research or discussions, Washington Refuse and Recycling Association will take care to avoid any anti-competitive aspects.

It is Washington Refuse and Recycling Association's policy that its staff be well versed in antitrust matters. The U.S. Department of Justice has applied increased scrutiny to anti-trust issues in recent years, particularly on the topic of information exchanges. All members must be aware of potential antitrust problems and it is everyone's responsibility to see that improper subjects are not discussed or considered. This policy statement has been prepared to assure that members of Washington Refuse and Recycling Association are aware of this obligation.

The Do's and Don'ts presented here highlight basic antitrust principles and apply primarily to your non-regulated business activities, but care must also be taken even when regulated activities are involved. Members should consult counsel in all cases involving specific situations, interpretations or advice.

DON'T

1. Do not, in fact or in appearance or through a third party, discuss or exchange information with each other regarding:
 - a. Individual company process, price changes, price differentials, mark-ups, discounts, allowances, credit terms, etc. or data that bear on price, e.g., costs, production, capacity, inventories, sales, etc.
 - b. Industry pricing policies, price levels, price changes, differentials, etc.
 - c. Changes in industry production, capacity or inventories.
 - d. Bids on contracts for particular products; procedures for responding to bid invitations.
 - e. Plans of individual companies concerning the design, production, distribution or marketing of particular products, including proposed or existing territories or customers.
 - f. Matters relating to actual or potential suppliers that might have the effect of excluding them from any market or of influencing the business conduct of firms toward such suppliers or customers.
2. Do not discuss or exchange information regarding these matters during social gatherings incidental to Washington Refuse and Recycling Association sponsored meetings, even in jest.

DO

1. Adhere to prepared and distributed agendas for all Washington Refuse and Recycling Association meetings and object any time meeting minutes do not accurately reflect the matters which transpired.
2. Consult with the Washington Refuse and Recycling Association General Counsel and your company legal representative on any antitrust questions relating to Washington Refuse and Recycling Association meetings.
3. Protect against any discussions or meeting activities which may appear to violate the antitrust laws; disassociate yourself from any such discussions or activities and simply leave any meeting in which they may take place.