



## ANTITRUST GUIDELINES – 2018

The Commercial Aviation Alternative Fuels Initiative (CAAFI) is a volunteer coalition of airlines, aircraft and engine manufacturers, airports, energy producers, researchers, international participants and U.S. government agencies that focuses the efforts of the commercial aviation sector to engage the emerging alternative fuels industry. CAAFI's goal is to promote the development of alternative jet fuel options that offer equivalent safety and favorable costs compared with petroleum-based jet fuel, while offering environmental improvement and energy supply security for aviation. CAAFI is technology-, feedstock- and company-neutral in its work.

Although not itself a company, CAAFI conducts its work and meetings in compliance with antitrust laws, which flow from the basic principle that groups of companies cannot act together to use their economic power to limit or otherwise harm competition. This means that what can be done *individually by a firm or entity* could be unlawful if done *collectively by a group of firms or entities*. Something that may seem to make "good business sense" when done by an individual company can injure competition when done collectively or in coordination by a group of companies and, therefore, may be prohibited under the antitrust laws. This is especially so when the collective or coordinated action involves competitors. Violation of the antitrust laws does not require a formal or written agreement among companies.

Violation of the antitrust laws can result in civil or criminal penalties, or both. These penalties can be severe and can be imposed on companies or individuals, or both.

Taking into account these antitrust law considerations, CAAFI does not discuss, reach agreements or exchange information about such subjects as:

- **Price- or service-related terms.** For example, CAAFI does not discuss or exchange information about pricing information not otherwise in the public domain and does not take, promote, support or discuss a position on pricing of fuels, feedstocks or fuel services or terms for fuels, feedstocks or fuel services.
- **Division or allocation of markets or customers.** For example, CAAFI does not discuss or exchange information with respect to limiting the geographic availability of fuels, feedstocks or services or products, dividing up the territory in which fuels, feedstocks, services or products will be provided, or dividing up customers.
- **Boycotts or blacklists.** For example, CAAFI does not discuss or exchange information with respect to limiting or refusing to do business with a business or customer, group of businesses or customers or category of businesses or customers, or a supplier, group of suppliers or category of suppliers
- **Agreeing on which suppliers to use.** For example, CAAFI does not discuss or exchange information regarding which suppliers to use or otherwise specify which suppliers to use.

If a CAAFI participant becomes uncomfortable about discussing or acting on an issue because s/he believes that it is competitively sensitive, the CAAFI participant should immediately say so and seek the advice of legal counsel before further discussing or acting on it. If so alerted, the lead of the CAAFI discussion, matter or event should, taking these Guidelines into account, consider steering the discussion away from the area of concern or seeking legal counsel before proceeding on the issue.