



Antitrust Principles & Certification of Compliance

The antitrust laws seek to ensure that our economy will continue to function based on vigorous and open competition. The harshest penalties (which include large fines and incarceration) are imposed when competitors get together and agree not to compete. Since antitrust violations can be proven by circumstantial evidence, it is generally good advice for competitors not to talk to one another in uncontrolled settings, lest someone infer that such conversations were for the purpose of engaging in some competition-reducing activity, such as price fixing.

However, the law does recognize that there are many important (and legally proper) reasons for competitors to talk to one another. Competitors may exchange information designed to benefit all parties and increase competition, such as by to improving efficiency, enhancing product safety, advancing technology, etc. Our goal, therefore, is to make certain that whenever meetings of the Supplier Network occur, only proper subjects are discussed (as set forth in the Supplier Network Charter), and a record of the meeting is kept, so that there will be no misunderstandings about the purpose of the meeting.

Accordingly, with the understanding that there is a public interest in openly sharing best practices, and that there is no intent to reduce competition between any of the participants in this group, or between competitors of McDonald’s™, each participant in the Supplier Network agrees to be bound by the following rules:

1. All attendees agree that they will comply with the antitrust laws and these guidelines.
2. Attendees will not agree or exchange information with one another as to how they will
 - a) price their products, b) market products, c) choose which products to sell, d) purchase supplies, e) choose with whom they will deal, f) promote products, g) eliminate or adopt certain methods of competing, h) establish fair or reasonable profit margins or costs for services, i) boycott or select any service provider, j) boycott or exclude any competitor, or k) adopt future programs, practices, or policies. Participants in these meetings must avoid discussion of these topics, except as may be specifically cleared by counsel in advance.
3. Attendees will not disclose any confidential information about their companies.
4. Meetings will follow a pre-established agenda, approved by counsel.
5. Each meeting will start with a reminder of these principles
6. If any attendee is concerned that a subject of discussion may be improper, and a lawyer is not present, the discussion will immediately stop until a lawyer can be consulted regarding the propriety of the discussion.

Agreed to this ____ day of _____, 20__

Name (Printed)	Company	Title
_____	_____	_____

Signature
