



Antitrust Compliance Policy

Fulcrum Nonprofit Leadership, LLC

Effective Date: January 22, 2024

1. Purpose

Fulcrum Nonprofit Leadership, LLC is committed to full compliance with all applicable antitrust laws. This policy is designed to provide guidance to all members of the organization on how to conduct themselves in a manner that complies with antitrust laws.

2. General Principles

- a. Competition Law Compliance: All members must comply with the antitrust and competition laws applicable in the jurisdictions in which the organization operates.
- b. No Anti-Competitive Agreements: Members are strictly prohibited from engaging in any agreements or discussions that could lead to anti-competitive behavior, including price-fixing, market allocation, bid rigging, or any other practice that restrains trade.
- c. Independent Decision-Making: Members must make their own independent business decisions regarding pricing, marketing, customers, suppliers, and other business-related matters.

3. Meetings and Discussions

- a. Agenda and Minutes: All meetings of the organization, including board meetings, committee meetings, and general membership meetings, should have a clear agenda. Minutes of all meetings should be maintained, outlining topics discussed and decisions made.
- b. Avoiding Sensitive Topics: Members must avoid discussing sensitive business matters that could lead to anti-competitive behavior, including pricing, market shares, or terms of dealing with customers or suppliers.

4. Exchange of Information

- a. Competitive Information: Members should not exchange competitively sensitive information with competitors. This includes current and future prices, costs, market shares, sales, production volumes, or any other proprietary business information.

5. Complaints and Concerns

a. Reporting Violations: Members who become aware of any potential antitrust violations must report their concerns to the Executive Committee. Reports will be treated confidentially, and the organization will conduct a prompt investigation.

6. Consequences for Violations

Violations of this Antitrust Compliance Policy may result in disciplinary actions, including but not limited to warnings, suspension, or termination of membership, as determined by the [Governing Body or Committee].

7. Education and Training

The organization will provide education and training on antitrust compliance to all members to ensure a clear understanding of the laws and their implications.

8. Review and Amendments

This Antitrust Compliance Policy will be reviewed periodically and may be amended as needed. Members will be notified of any changes.

9. Contact Information

For questions regarding this Antitrust Compliance Policy, please email us at hello@fulcrumleader.com.