

Trade associations by their nature facilitate contact and communication between actual and potential competitors. A competition law compliance program plays a crucial role for trade associations because trade associations face unique compliance issues. Given that an association provides a forum where competitors collaborate on association activities, trade associations are exposed to greater risks of anti-competitive conduct. It is therefore critical that trade associations implement credible and effective programs with strict codes of ethics and conduct. Such programs assist trade associations and their members avoid improper actions and protect themselves from being used as a conduit for illegal activities. The Canadian Propane Association (CPA) has a strict policy of adherence to competition law and has adopted a competition law compliance program. This is in the best interest of the association and all of its members, and will allow CPA members to fully benefit from the association's activities while reducing the potential for inadvertent contraventions of the Acts.

All participants are advised that in accordance with the CPA Competition Law Compliance Program:

1) All discussions or conversations among members and others attending CPA meetings, including those that occur during breaks and scheduled or non-scheduled social activities associated with the events, must conform to the CPA Program.

2) Recognizing that the existence of an unlawful agreement or concerted practice may be inferred from circumstances, including the exchange of information by competitors, discussions or disclosures of the following types of information are prohibited, except when such information has otherwise been made public or been approved by counsel:

- (a) Individual company fares, rates, charges or surcharges;
- (b) Individual company costs;
- (c) An individual company's intentions regarding increasing, reducing or reallocating capacity (including entering or exiting markets);
- (d) Information on individual company's customers; and
- (e) Any other sensitive commercial or proprietary information.

Likewise there shall be no discussion of any agreement between any competitors or potential competitors with respect to any of the forgoing topics. Should you have questions about what can and cannot be discussed, please consult the CPA Staff facilitating the meeting. Those who do not respect these procedures will face sanctions, which may include expulsion from the Association.