

ANTITRUST COMPLIANCE POLICY

DENVER LAW FIRM COALITION FOR EQUITY & INCLUSION

It is the express policy of the Denver Law Firm Coalition for Equity & Inclusion (the “Coalition”) to comply fully and strictly with both federal and state antitrust laws. This policy is motivated by a firm respect for the antitrust laws, as well as by the recognition of the potentially severe detrimental consequences of antitrust violations. The Coalition, along with each individual member, aims to conduct itself in such a way as to avoid any potential for antitrust exposure in the first instance. Full compliance with the antitrust laws is a requirement for participation in the Coalition, and responsibility for compliance rests with each member.

Broadly speaking, the primary areas of antitrust concern for business coalitions and trade associations are price-fixing, customer allocation, association membership, standardization and certification, and industry self-regulation. Additional antitrust concerns relate to the manner in which firms compete for professional talent, and specifically wage-fixing and no-poaching agreements. Consequently, sharing competitively-sensitive information regarding business and employment practices may raise an inference of improper activity and expose the Coalition or its members to antitrust scrutiny.

In order to comply with the antitrust laws, members of the Coalition will not discuss certain subjects when they are together, either at formal meetings or in informal contacts with other members. Topics to avoid discussing with competitors include: billing rates and trends, timing of rate changes, costs of common inputs, margins, compensation of employees, employee benefits, and terms of employment. Members have an obligation to terminate any discussion, seek legal counsel’s advice, or, if necessary, terminate any meeting if the discussion might be construed to raise any antitrust risks.