

GLOBAL MINING GUIDELINES GROUP



Antitrust Compliance Guide

Date: July 2018

matters of antitrust sensitivity might arise at a meeting (e.g., if any discussion appears likely to stray into prohibited or particularly sensitive areas), the GMG staff and the appropriate committee chairperson will end the discussion and raise the matter with legal counsel.

7. Under no circumstances should any “off the record” remarks be permitted at meetings.
8. GMG will not sponsor or in any way encourage or condone “splinter” gatherings at the GMG meeting or meetings held after the GMG meeting. All GMG business affairs, and particularly those dealing with potentially antitrust-sensitive issues, must be confined to formal meetings at which accurate minutes are kept and for which an advanced agenda has been prepared.
9. Where GMG meetings involve senior management or marketing personnel, or involve subject matter that is potentially sensitive under the antitrust laws, the GMG staff and legal counsel should be consulted. It may be concluded that legal counsel, along with a GMG staff person, should attend the meeting to assist the Chairperson in conducting the meeting in a proper fashion.
10. The establishment of industry guidelines and best practices is an open process and subject to the public domain considerations. Each of the GMG participants IP Policies establishes that certain rights are granted by participants to use their contributions without obligation. As such, all correspondence and publications will be reviewed by the Executive Council to ensure compliance. Responsibility for compliance rests with every member and participant of this group along with any invited guest or participant. Suspected violations of this notice should be communicated to the group leadership.
11. This notice shall be reviewed at the beginning of each major meeting of the group. In case any participant feels that there is an issue in this regard, all participants are honor bound to escalate that concern to the Governing Council of the Global Mining Guidelines Group.

