



CODE OF CONDUCT REGARDING

COMPETITION LAW GUIDELINES

FOR IGTA AND ITS MEMBERS

1 DOS AND DON'TS FOR IGTA

- **Do** ensure that membership criteria are objective and that each member is aware of its obligations under competition law.
- **Do** remember that each member must determine its own policy independently and make its own commercial decisions.
- **Do** act as "eyes and ears" for IGTA members. IGTA can receive non-commercially sensitive information, such as proposed regulatory changes, on behalf of its members and can pass it on to members.
- **Do** speak to governments, regulators and/or relevant conferences on behalf of IGTA members.
- **Do** act as a representative of Treasury associations, e.g. to the media.
- **Do** review meeting agendas and accompanying documents in advance to ensure they comply with competition law. The agenda and any presentations and discussions at an IGTA meeting (including those under a general heading like "any other business") should only include matters that may legitimately be discussed between competitors. Any question as to whether it is appropriate for an item to be included in an agenda (or discussed at a meeting) should be referred to an external lawyer. Where there are particular competition law concerns, consider having an external lawyer in attendance.
- **Do** review minutes of meetings to ensure they are an accurate record.
- **Do** ensure that all correspondence is carefully written, to avoid factual misstatements or inferences or conclusions that may be misinterpreted or taken out of context by someone else.
- **Don't** restrict the areas or places within which a member may carry on, market or promote its activities, or seek to impose conditions on how they may do so (such as informing another member or asking its permission).
- **Don't** advise or instruct IGTA members how to react or respond to information or

