

Competition Guidelines Governing SAPI Meetings

Meeting Guidelines

- These Meeting Guidelines (“**Meeting Guidelines**”) are based on the IFPMA’s Competition Guidelines Governing IFPMA Meetings.
- The Meeting Guidelines are designed to ensure that in organising and attending meetings (especially where competitor companies are in attendance), members avoid engaging in and facilitating any discussion or activity which might violate applicable anti-competition laws, including the Singapore Competition Act (Cap. 50B).
- The chairperson of the meeting shall remind meeting participants of these Meeting Guidelines at least once annually, or as and when necessary (e.g. when there are new members participating in the meeting).
- SAPI Secretariat must be present at the meeting, which must have a legitimate purpose, and a written agenda circulated in advance of each meeting.
- Discussion at the meeting should generally not deviate beyond the scope of the agenda.
- Written minutes will be taken at the meeting and circulated to all participants. The chairperson shall ensure that a copy of the written minutes will also be provided to SAPI, to be stored in accordance with SAPI’s data retention policy.
- Where there is doubt as to the legitimacy of a discussion, the chairperson, SAPI Secretariat and/or any meeting participant must immediately **STOP** the discussion and consider whether such discussion can be continued after SAPI has the opportunity to engage legal counsel to advise the legitimacy of such discussions.

Prohibited Conduct

It is unlawful to enter into agreements, whether written or oral, binding or not, that significantly restrict or distort competition in Singapore.

In order to prevent agreements that lessen competition from occurring at meetings, members shall refrain from exchanging competitive information, including but not limited to:

- Trading conditions, sources of supply;
- Pricing strategies, product pricing, discounts, and credit terms;
- Costs of production and distribution, output, methods of computing costs;
- Specific suppliers and customers, including any discussion that may have the effect of excluding suppliers or customers from the market;
- Market share, confidential future plans of investment, marketing, and technological developments.

This list is not exhaustive and the Competition and Consumer Commission of Singapore has wide powers of investigation and enforcement into practices which may fall afoul of anti-competition laws.

All SAPI committees and members must comply with these Meeting Guidelines, as amended from time to time.