

BCI Trade Credit Exchange Code of Conduct

All BCI members, as representatives of their respective companies, agree to abide by the highest standards of professional conduct and to strictly adhere to [Federal and State Antitrust laws](#) which have been developed to protect economic freedom and promote fair competition in the market.

BCI member discussions, whether in monitored credit group meetings or in private communications outside of meetings, must be conducted in accordance with antitrust guidelines and the BCI Code of Conduct. Many BCI member companies are competitors and provide products and services to common customers.

Maintaining trust and confidence that information sharing is being conducted ethically and properly is imperative. In summary:

1. There will be no agreements, written or implied, regarding setting prices, terms, or discounts in any communications between members and/or competitors.
2. BCI members may discuss only past factual, completed transactional history. Future plans, policies, pricing, and/or terms which may be under consideration cannot be disclosed.
3. Communications between BCI members about customers cannot include any slanderous or defaming comments or statements, and
4. Trade exchange will be conducted referencing respective company member numbers only; no company names will be used or associated with the respective trade information being exchanged.

As a third party, trusted custodian of confidential trade information, BCI maintains very strict controls to safeguard information to ensure continued trust within the BCI Network. It is therefore understood that:

- ☐ BCI uses this confidential trade information to compile proprietary reports exclusively “from BCI members for BCI members.” Under no circumstances may any of this privileged information be shared with or shown to a member company’s customer, non-credit department staff or any other party.
- ☐ BCI has a “give-to-get” information exchange policy, meaning a member company must provide their trade exchange information, including the reason why they are requesting information, to be able to receive information. Companies subscribed to a trade credit exchange group must submit customer names and respond to all relevant requests for reciprocal information to be eligible to receive the group’s book of reports.
- ☐ To obtain trade exchange information, a member company must, at a minimum, have an established buyer/seller relationship with a customer, be selling on COD and/or have a signed credit application for terms. Under no circumstances should a member company request trade exchange information for a prospective customer; “phishing” for information is strictly prohibited.
- ☐ The BCI member and credit group rosters are created and maintained by BCI to help facilitate communication and information exchange exclusively within The BCI Network. Rosters are the property of BCI, are confidential and cannot be shared with anyone without BCI’s express permission. The company’s “voting” member is responsible to keep all company contacts and their information current, to report timely contact changes to limit access to confidential information and to keep all BCI obligations current.
- ☐ BCI member company contacts with access to BCI’s Trade Credit Exchange system must successfully complete annual antitrust compliance training to protect both the BCI Network, as well as each participating BCI member company.
- ☐ BCI’s information may include identifying, company and associated trade information on a common customer; this information should also be handled confidentially. If a BCI member company wants to learn the identity of a party

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listed on a BCI credit report, they should contact BCI, who will in turn obtain permission to release the requested identifying member/non-member company information.

- ☐ BCI offers in-person, hybrid, and remote-only facilitation for trade exchange meetings. Remote participants must: pre-register, agree to abide by the BCI Trade Exchange Code of Conduct, and confirm participation from a private location to prevent non-members from hearing the group discussions.
- ☐ BCI member companies must adhere to the following AI policies to protect all trade exchange group participants, their respective companies, and their company's data:
 - Company participants are forbidden to record and/or summarize any group meeting discussions using AI or electronic recording devices,
 - BCI prohibits any information supplied by and/or contained in a BCI Credit Report from:
 - being uploaded into,
 - included in prompts for, and/or
 - manipulated by **any AI tool**.

Any violation of the above BCI Code of Conduct is considered a breach of confidence and will result in immediate company suspension and potential expulsion from your respective BCI trade exchange credit group and/or The BCI Network.

Appendix: U.S. Antitrust Laws – Quick Reference

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Sherman Act | Clayton Act | Robinson-Patman Act

Law	Year Passed	Purpose	Key Prohibitions	Enforcement Agencies	Key Notes
Sherman Antitrust Act	1890	Maintain free competition and prevent monopolies.	- Restraint of trade (Sec. 1) - Monopolization (Sec. 2)	DOJ Antitrust Division; private lawsuits	First major U.S. antitrust law; broad language interpreted by courts.
Clayton Antitrust Act	1914	Close loopholes in Sherman and target specific harmful practices before monopolies form.	- Price discrimination (Sec. 2) - Exclusive dealing & tying (Sec. 3) - Anticompetitive mergers (Sec. 7) - Interlocking directorates (Sec. 8)	DOJ & FTC; private lawsuits	Preventive — addresses conduct that may lead to monopolization.
Robinson-Patman Act	1936	Protect small businesses from discriminatory pricing and promotional practices.	- Price discrimination (Sec. 2(a)) - Discriminatory promotional allowances/services (Sec. 2(d) & (e))	FTC; private lawsuits	Amendment to Clayton Act; applies mainly to tangible goods, not services.