

Wesleyan University Antitrust Policy & Guidelines

APPLICATION: Trustees, Officers, Faculty, Staff, and all other Employees

ISSUED: *111712*

REVISED:

1. Introduction

a) All of Wesleyan University's actions with regard to competing colleges and universities throughout the country are governed and limited by the Federal and State Anti-trust Laws. These laws prohibit competitors from fixing prices, dividing their markets and generally prohibit competitors from taking concerted actions that may lessen free and independent competition.

b) The Anti-trust Laws apply to Wesleyan even though Wesleyan is a not-for-profit institute of higher learning. Wesleyan employees may create liability for the University by violating the Anti-trust Laws. Further, employees may incur personal liability including civil fines and criminal penalties.

c) The following guidelines are intended to protect you and Wesleyan. IF AT ANY TIME YOU ARE IN DOUBT AS TO WHETHER YOUR ACTIONS MIGHT VIOLATE THESE GUIDELINES, YOU SHOULD IMMEDIATELY SEEK GUIDANCE FROM THE UNIVERSITY'S GENERAL COUNSEL AT (860)685-3360.

2. Tuition, housing, activity and other fees. No Wesleyan employee should communicate with another college or university concerning any of the following:

a) Increases in the dollar amount of any fee being investigated or planned by Wesleyan;

b) Percentage increases in the amount of any fee being investigated or planned by Wesleyan;

c) The amount of any non-public fee charged by Wesleyan; and/or

d) Whether Wesleyan will or will not increase, decrease or otherwise modify any fee in any particular time period.

3. **Financial Aid.** No Wesleyan employee should communicate with another college or university concerning any of the following:
- a) Increases in the dollar amount of financial aid to students being investigated or planned by Wesleyan;
 - b) Percentage increases in the amount of financial aid to students being investigated or planned by Wesleyan;
 - c) Whether or not Wesleyan will or won't, in the future, use a "need-blind" based admissions program;
 - d) The amount of family contributions to be expected from individual aid applicants;
 - e) The mix of grants and self-help to be awarded individual aid applicants; and/or
 - f) Whether or not Wesleyan will or will not increase, decrease or otherwise modify its financial aid program or financial aid budget in any particular time period.
4. **Salaries.** No Wesleyan employee should communicate with another college or university concerning any of the following:
- a) Increases in the dollar amount of salaries for any group of Wesleyan employees being investigated or planned by Wesleyan;
 - b) Percentage increases in the salaries for any group of Wesleyan employees being investigated or planned by Wesleyan;
 - c) The starting salaries for any classification of Wesleyan employees;
 - d) Whether or not Wesleyan will or will not increase, decrease or otherwise modify its salaries for any specific classification of Wesleyan employees in any particular time period; and, further,
 - e) Nor shall any Wesleyan employee share non-public salary data with any official at another university or college.

5. **Geographic Preferences.** No Wesleyan employee should communicate with another college or university concerning any weighting, preference or other factor that may suggest that Wesleyan is or is not seeking student applicants from a particular geographic region or location.

6. **Meetings and Conferences with Officials from Other Colleges and Universities.** If you attend a meeting or conference with officials or employees from other colleges and universities and one of the subject matters referred to in Sections 2-5 is discussed, you should immediately leave the meeting and promptly notify the General Counsel. You should understand that simply sitting in the meeting without complaint may be regarded by the Department of Justice as agreement to whatever was being discussed or proposed.

No employee, agent or consultant acting on behalf of Wesleyan is exempt from these guidelines. If you have any doubt as to whether some action of yours may be in violation of these Guidelines, promptly consult the General Counsel.