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<b>SUBJECT:</b>	<b>Code of Business Conduct and Ethics</b>	<b>DATE:</b>	March 20, 2019
		<b>ISSUED BY:</b>	A. D'Iorio
<b>APPLICATION:</b>	EVERYONE	<b>APPROVED BY:</b>	M.H. Mitchell
<b>REV NO:</b>	10		

**ANTITRUST COMPLIANCE** (Source: Section III C of CP 102)

The Company believes that lawful and open competition is the cornerstone of the free enterprise system. It is the Company's policy to support and comply with the antitrust laws of the United States and similar laws of other countries where the Company does business. This policy requires all Company employees to comply strictly with federal and, where applicable, state or foreign antitrust laws. The Company will not enter into any agreement or arrangement with third parties that could, directly or indirectly, unlawfully affect the price or terms of sales of the Company's products or services or those of others. In particular, this general policy requires the following:

1. Price Fixing. The Company will not make or attempt to make any agreement or understanding with any competitor regarding any element of price, including agreements on list prices, bid prices, unit prices, discounts, credit terms, margins or rebates, nor will the Company communicate with competitors concerning these topics.
2. Allocation of Markets and Limitations on Competition. The Company will not make or attempt to make any agreement or understanding with any competitor concerning the allocation of territories, customers or market segments or concerning any limitations on production or new product introductions.
3. Monopolization. The Company will not engage in exclusionary conduct, such as sustained below-cost pricing, in an attempt to monopolize any market.
4. Concerted Refusal to Deal. The Company will not make any agreement or understanding with any competitor to refuse to deal with any customer or supplier.
5. Tying Arrangements. The Company will not condition its sales of any one product on the purchaser's agreement to purchase another product without prior approval of the Law Department.
6. Exchange of Competitive Information. The Company will not exchange competitive information, such as information on current or future prices, production statistics, inventories or costs, where that exchange would or could facilitate the fixing, raising or stabilizing of prices.
7. Resale Price Maintenance. The Company will not extract agreements from customers regarding the price or minimum price at which the customer will resell a product without prior approval of the Law Department.
8. Price Discrimination. The Company will not sell the same product at different prices or on different terms or conditions to different customers during the same time period where the effect of doing so causes injury to competition among the competing customers. Rather, the Company will provide equal opportunities to competing customers, except that the Company may selectively lower prices to meet a competitor's low price.
9. Trade Associations. The Company will not participate in any business group or trade association activity that would impair or reduce competition in any of the markets the Company serves.
10. Other Activities. Employees should be particularly aware of the antitrust implications of such actions as joint bidding or other joint venture type arrangements or the termination of a long-standing business relationship such as with a long-term distributor. Guidance from legal counsel in this area is essential.
11. Business Unit Processes. Be certain to comply with all relevant procedures implemented by your business unit with respect to these matters.