

ANTITRUST GUIDELINES

Antitrust laws exist to promote and protect competition in the marketplace. These laws prohibit various practices that could restrain or inhibit free competition. Violations of these laws can result in severe penalties.

Antitrust laws apply to all industries. This summary includes general principles applicable to all businesses, as well as specific guidance relating to the funeral and cemetery industries. Our goal is to ensure strict compliance with all federal and state antitrust laws and to avoid any conduct that could create any appearance of impropriety.

INTERACTIONS WITH COMPETITORS

The Company and its employees must not enter into any agreements or understandings (oral or written) with present or potential competitors regarding prices, pricing formulas, discounts, costs, division of territories or customers, credit terms, or other terms or conditions of sale. Mere discussion of these subjects with competitors may create the appearance of collusion or conspiracy, even where none actually exists; therefore, such discussions must be avoided. The Company's Employee Handbook includes more detailed information on this subject.

INTERACTIONS WITH SUPPLIERS

The Company and its employees must not enter into discussions or agreements with suppliers for the purpose of restricting the sale of their products to other retailers. In addition, we must not make any agreements or encourage others to avoid using any particular supplier.

INTERACTIONS WITH CUSTOMERS

Funeral Homes

- Funeral homes must permit their customers to use a casket purchased from another supplier.
- Funeral homes must avoid taking any actions designed to make it difficult or burdensome for a customer to use a casket provided by another supplier. For example:
 - Casket handling fees are strictly prohibited.
 - Do not require a customer to be present when their casket is delivered. (However, it is permissible and appropriate to ask the customer to sign a "Casket Acknowledgement" form.)

- Never disparage caskets or merchandise provided by another supplier. It may lead to legal claims based on defamation theories and it simply makes you look bad in the eyes of your customer. If a customer asks about the quality of a competitor's merchandise, you should simply state that, while you can discuss the quality, features and warranties of our own products, you do not have adequate knowledge of our competitor's products to provide meaningful information.
- Do not require a customer to purchase anything they do not want. Only the funeral home's Basic Services Fee is nondeclinable. All other items may be declined by the customer. Exceptions: (1) Embalming may be required if the family requests visitation with the body present. (2) Outer burial containers may be required by the cemetery chosen by the family. However, the customer must be permitted to purchase that container from any supplier of his/her choosing.

Note: If a funeral home requires an in-person identification viewing, no fee may be imposed for that service. If a funeral home does not require an in-person identification viewing, then, an in-person viewing requested by the customer may result in an additional fee.

Cemeteries

- Cemeteries must not prohibit others from providing markers, monuments, caskets or outer burial containers for use on their premises.
- Cemeteries must not prohibit others from installing markers, monuments or outer burial containers on their premises. However, the cemetery is permitted to establish specifications for markers, monuments and outer burial containers and insist that all such products provided by other suppliers meet such specifications.

Note: In most states, cemeteries can insist that outside contractors satisfy the insurance and indemnification requirements set forth in the Cemetery's Rules and Regulations. In Florida, cemeteries may not require that a monument dealer maintain insurance.

- Cemeteries must not take actions designed to make it difficult or burdensome for a customer to use a third-party supplier for such items. Examples:
 - If a cemetery provides or permits a temporary marker for customers who purchase their marker from the cemetery, it should not prohibit the use of temporary markers for customers who purchased from another supplier (provided that the temporary marker meets the cemetery's specifications).
 - Cemeteries may not impose surcharges or "access fees" when third-party installers are used.

- Inspection Fees. In most states, cemeteries may charge a reasonable fee for the inspection of a third party's installation. However, that fee must be directly related to the cemetery's actual costs of conducting the inspection. An inspection fee is not allowed in Florida.
- Memorial Benches. A cemetery is free to decide where it will allow the placement of memorial benches. However, where such benches are allowed, the customer must be permitted to purchase from an outside supplier (provided the bench meets the cemetery's specifications).
- Private Mausoleums. Customers are permitted to use an outside contractor to construct a private mausoleum, provided that the specifications for such project meet with the cemetery's approval and the contractor satisfies the insurance and indemnification requirements set forth in the Cemetery's Rules and Regulations.

CONCLUSION

Given our goal of avoiding even the appearance of impropriety, some of the above guidelines may be more stringent than the bare minimum legal requirements. Compliance with the above policies is mandatory and is a matter of the utmost importance. Funeral home and cemetery managers are responsible for ensuring full compliance within their operations. Failure to comply could subject the Company and the employee to serious legal exposure and is grounds for disciplinary action (up to and including termination of employment) against any employee who violates any of these policies.

Any questions pertaining to this subject should be directed to the Legal Department. Any inquiries, concerns or allegations regarding compliance with these requirements should also be directed to the Legal Department.