

## ANTITRUST COMPLIANCE POLICY AND CHECKLIST

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The following summary and checklist outlines several basic antitrust principles that the members, directors and staff of the FiRa Consortium (the “Consortium”) should bear in mind in connection with Consortium-sponsored meetings, activities and social gatherings. This Checklist is not intended as a complete list of antitrust guidelines, and the Consortium strongly encourages you to periodically review the Consortium’s Antitrust Compliance Memorandum. Additionally, we strongly encourage you to forward all specific questions relating to antitrust compliance not addressed in the Antitrust Compliance Policy to the legal counsel who has responsibility for and expertise in considering the antitrust implications of your business activities.

Meetings and other activities of the Consortium necessarily involve participation by industry competitors, and it is the express policy of the Consortium to require that all of its activities be conducted strictly in accordance with applicable antitrust laws. It is therefore extremely important that Consortium members and any non-members that may be invited to participate in Consortium activities be aware of and not participate in any activities that are prohibited under applicable US state, federal or foreign antitrust laws. The following is a non-exclusive conduct checklist to assist in compliance with this Policy:

1. Always conduct relations with competitors as if they were in the public view and avoid even the appearance of impropriety.
2. Do not meet actual or potential competitors in connection with the Consortium matters without Consortium staff or counsel present.
3. Do not discuss (even in jest), exchange information regarding or agree upon (even verbally, informally or impliedly) any of the following, with any actual or potential competitor, while at any Consortium meeting, Consortium social gathering incident, or otherwise:
  - a. Individual company or industry pricing information or policies, including without limitation, actual or anticipated prices, price changes, price differentials, price formulas, mark-ups, discounts, warranties, allowances, credit terms, costs, sales, profits, margins, or the like.
  - b. Individual company market shares for any product or for all products.
  - c. Individual company bids or intentions to bid for particular products, procedures for responding to bid invitations or specific contractual arrangements.
  - d. Individual company current or projected costs of product procurement, development or manufacture.
  - e. Individual company product design, characteristics, production, capacity, supply or distribution.
  - f. Individual company marketing plans, strategies and market division, including without limitation, plans regarding geographic territories, demographic groups, individual customers to be targeted or ignored, or planned introduction dates of particular products, technologies, or services.

