

## **Antitrust Compliance Policy for Mopria Alliance, Inc. (the “Alliance”)**

Antitrust and competition laws throughout the world rest on the premise that competition in the provision of products and services is the best way to ensure that consumers and other users receive maximum innovation and quality at the lowest possible prices. But sometimes effective competition requires a measure of cooperation among competing firms.

Standards development is one of those areas. By fostering product interoperability, standards development can facilitate the creations and expansion of new product markets or improve the quality or efficiency of existing products – but it can do so only if the standards development is conducted consistent with the antitrust and competition laws that regulate the nature and extent of cooperation in which competitors can legitimately engage. A violation (or claims of violation) of competition laws will jeopardize the Alliance’s goal to promote mobile print standards and may expose individual participants and their employers to the risk of imprisonment and other criminal penalties, civil remedies, and significant litigation costs. Even if a competition-law case or investigation is ultimately dropped, that will often happen only after the parties have spent considerable resources in responding to information requests and defending against the claims.

Accordingly it is the policy of the Alliance that the Alliance and all companies participating in the Alliance (including, without limitation, in the Alliance’s standards development activity) shall comply with applicable antitrust and competition laws. Alliance Members acknowledge that they may compete with one another in various lines of business and that it is therefore imperative that they and participants from their companies act in a manner that does not violate any applicable antitrust or competition laws and regulations. Individual participants must proceed with caution to ensure against inadvertent violations of such laws. Individual participants should contact their company’s legal department, which may have materials to explain the laws. The Alliance shall not play any role in the competitive decisions of its Members or in any way restrict competition among its Members or in its Members’ industries.

Each Alliance Member may design, develop, manufacture, acquire or market competitive specifications, products and services, and conduct its business in whatever way it chooses. Alliance Members participating in Alliance activities shall not have any discussion relating to product pricing, methods or channels of product distribution, any division of markets, or allocation of customers or any other topic that should not be discussed among competitors. Such forbidden discussion topics are described in more detail on Schedule A.

Each meeting of the Alliance’s Members, Board of Directors or committee or working group should begin with a reminder that the meeting will be conducted in accordance with this Antitrust Compliance Policy.

It is each Alliance Member’s responsibility to obtain appropriate legal counsel regarding its conduct and compliance with applicable antitrust or competition laws and regulations.

**REMEMBER: Both your company and you as an individual can be prosecuted for violations of antitrust and competition laws.**

## Schedule A

### Topics not to be Discussed

Topics that Members *cannot* discuss include:

- prices at which products or services (including, without limitation, any products or services that implement a proposed standard) should be sold (“price” includes discounts, terms, and other conditions of sale);
- competitive strategy (generally or bid-specific) for any products or services;
- profits or profit margins;
- individual companies’ market shares or sales territories;
- allocation of customers, markets, production levels, or territories; or restricting the customers to whom, or territories in which, a company may sell or resell products;
- using standards or certification programs to exclude suppliers or competitors from the marketplace (but participants may select technology for inclusion in a standard based on cost-performance or technical considerations);
- conditioning the implementation of a standard on the implementer’s use of products or services from a particular supplier (such as requiring use of a particular manufacturer’s components or requiring implementers to use a particular service provider(s) for compliance certification);
- bidding (or terms of bids) or refraining from bidding to sell any product or service;
- business practices to reduce competition between members or using the concerted force of members to competitively harm or foreclose non-members; and
- any restriction on any company’s independence in setting prices, establishing production and sales levels, choosing the markets in which it operates, or the manner in which it selects its customers and suppliers.