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## GlobalPlatform, Inc.

### ANTITRUST GUIDELINES

These Guidelines are designed to inform members of GLOBALPLATFORM Inc. and participants in its meetings and programs of their obligations under the antitrust laws of the United States and other jurisdictions. These Guidelines apply equally to formal GLOBALPLATFORM meetings, social events, and informal gatherings that occur in the context of organizational activities.

The antitrust and competition laws seek to preserve free and open competition. As a general rule, competitors may not restrain competition among themselves through understandings or agreements with respect to price, production or distribution of their products, or through other agreements that unreasonably restrict competition. Furthermore, one group of competitors may not act in concert to restrict the competitive capabilities or opportunities of their competitors, suppliers or customers.

Penalties for violating the antitrust laws are severe. In the United States, for example, they include imprisonment, fines, money damages of three times the amount of injury caused, and far-reaching restrictions on future conduct. The federal antitrust laws apply to activities in interstate commerce. State antitrust laws are generally similar in substance and in sanctions.

GLOBALPLATFORM and other standard setting groups are organizations that, by their very nature, include companies that compete with each other in the marketplace. It is therefore important that GLOBALPLATFORM and its member companies refrain from activities that restrain or appear to impair competition in any way. These Guidelines are designed to help GLOBALPLATFORM members identify and avoid situations that may implicate the antitrust laws.

1. A good way to avoid most antitrust issues is to confine discussions and actions to this group's legitimate mission.
2. Do not discuss your company's or competitors' prices or pricing practices, including any element that might affect prices, such as costs, discounts, terms of sale, services or allowances provided to customers, or profit margins. Such information should not be discussed regardless of whether it is available to competitors through other sources.
3. Do not discuss your company's business or operating plans as they relate to particular geographic markets, specific customers, classes of customers, competition, suppliers, or specific products or types of products.

Agreements or understandings among competitors to divide up customers, geographic areas, or classes of products may be punishable criminally.

4. Do not disclose to others at GLOBALPLATFORM meetings or events any competitively sensitive information of any nature, such as information about your company's pricing, customers, or product development plans.
5. Do not enter into any agreement or understanding regarding compliance with standards developed by the GLOBALPLATFORM or other organizations, such as agreements to follow or not to follow specifications established by any standard-setting body. Each company may decide unilaterally whether to support any standard, and there is no legal obligation to support any particular standard.
6. Do not discuss or enter into any agreement or understanding regarding the companies with which you will do business. None of the GLOBALPLATFORM member companies should agree to boycott third parties who are commercial rivals or who do business with commercial rivals.
7. Do not discuss or enter into an agreement or understanding with a competitor regarding the types of products or technologies that your respective companies will or will not produce, market or support.
8. Do not stay at a GLOBALPLATFORM meeting or event where discussion of any of the foregoing topics occurs.
9. If you have any doubt about a GLOBALPLATFORM activity or subject of discussion, consult with GLOBALPLATFORM staff and with counsel, if present. You also may wish to consult with your own company's counsel. If you feel that a discussion is improper, you should disassociate yourself from that discussion. If necessary, you should leave.

Please remember, these are general guidelines to aid you in your understanding of the issues, but as with any general guidelines, they are not comprehensive and are not a substitute for legal advice. If you have any questions or concerns, please consult with appropriate legal counsel.