

Adopted: May 22, 2017

CCIX CONSORTIUM, INC.
ANTITRUST POLICY (Version 1.0)

Adopted as of May 22, 2017

CCIX Consortium, Inc., a Delaware nonprofit corporation (“**CCIX**”) intends to conduct its affairs in compliance with the antitrust laws of the United States and, as applicable, the antitrust laws of the states within the United States and the antitrust/competition laws of other countries (collectively, the “**Antitrust Laws**”). The Antitrust Laws are intended to preserve and promote free, fair, and open competition. This competition benefits consumers and companies that are innovative and efficient. A violation of the Antitrust Laws can have serious consequences for CCIX and for participating companies. Accordingly, CCIX has adopted this Antitrust Policy (“**Policy**”) for itself, its CCIX Members (as such term is contemplated by CCIX’s Bylaws), directors, officers, employees, and agents, and for all attendees, licensees, customers, and other participants (collectively referred to as “**Participants**”), as guidance in connection with participation in CCIX’s activities.

At all meetings of the Board of Directors or of any other committee, subcommittee, or work group of CCIX or of any of the foregoing (each, a “**Committee**”), a statement substantially similar to the following will be read at the beginning of the meeting:

This is a reminder that all CCIX Consortium, Inc. activities are subject to strict compliance with CCIX Consortium, Inc.’s Antitrust Policy. Each individual participant and attendee at this meeting is responsible for knowing the contents of the Antitrust Policy, and for complying with the Antitrust Policy. Copies of the Antitrust Policy are available at:
https://ccix.causewaynow.com/wg/CCIX_Members/workgroup/home.

1. CCIX and its Committees or activities shall not be used for the purpose of bringing about or attempting to bring about any understanding or agreement, written or oral, formal or informal, express or implied, between and among competitors regarding their prices, terms or conditions of sale, distribution, volume of production, product development or introduction plans, territories, customers, or credit terms.
2. In connection with participation in CCIX, there shall be no discussion, communication, agreement, or disclosure among Participants that are actual or potential competitors, regarding their current or projected prices or any elements of prices, including price differentials, discounts, allowances, pricing methods, profits, profit margins, cost data, or terms or conditions of sale or licensing of products or services, production plans, capacities, market shares, sales territories, geographic or product markets, allocation of territories or customers, information on the timing, cost, or volume of research and development projects, production or sales, or information on bids, intentions to bid, procedures for responding to bid invitations, or specific contractual arrangements.
3. Each Participant is obligated and expected to exercise its independent business judgment in pricing its services or products, dealing with its customers and suppliers, and choosing the markets in which it will compete.
4. CCIX and the Participants, in connection with their participation in CCIX, shall not enter into any agreement or understanding among themselves to refrain, or to encourage others to refrain, from purchasing any raw materials, product, equipment, services, or other supplies from any supplier or vendor, or from dealing with any supplier or vendor; provided however, that this Policy shall not preclude CCIX or any Participant from asserting its intellectual property rights.
5. CCIX and the Participants, in connection with their participation in CCIX, shall not attempt to prevent any person from gaining access to any market or customer for goods or services, or attempt to prevent any person from obtaining a supply of goods or services or otherwise purchasing goods or services freely in the market; provided however, that this Policy shall not preclude the CCIX or any Participant from asserting its intellectual property rights.
6. The qualifications for participation in CCIX are as established by the Certificate of Incorporation and Bylaws of CCIX, and to the extent not inconsistent with the Certificate of Incorporation and Bylaws, by the Board of Directors. No otherwise eligible Participant shall be excluded from a Committee for an anti-competitive reason.

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7. To the extent that CCIX develops, administers or approves guidelines, standards, specifications, test procedures, or certification programs, a Participant's decision to adhere to or participate therein shall be voluntary on the part of the Participant, and shall in no way be compelled or coerced by CCIX; provided however that this guideline shall not prevent CCIX from adopting testing and certification programs, as well as logo and trademark usage requirements tied to adherence with CCIX's guidelines, standards, specifications, test procedures, or certification programs.

8. Guidelines, specifications, standards, test procedures, and certification programs, which may be developed, administered, approved, or adopted by CCIX, shall be based upon appropriate technical, business, and consumer considerations, and shall not be based upon any effort or purpose to reduce or eliminate competition in the sale, supply, and furnishing of products and services.

9. CCIX may condition use of its trademarks, logos, and other intellectual property, on compliance with terms and conditions developed to regulate the use of and to protect such intellectual property, and otherwise to maintain and enforce a compliance certification program in accordance with agreed terms and conditions and in conformity with the Antitrust Laws. Such terms and conditions may include a requirement of adherence with CCIX's guidelines, standards, specifications, test procedures, or certifications programs. CCIX also reserves the right to take appropriate action against any individual or entity which engages in false or misleading advertising regarding the use of or compliance with CCIX's guidelines, standards, specifications, test procedures, or certification program.

10. In conducting any meeting of the Board of Directors, or any Committee, the chairperson or secretary at the meeting shall prepare and follow a formal agenda. Minutes of all such meetings shall be maintained, and shall accurately reflect the subjects discussed and any actions taken.

11. During the course of the activities of CCIX, or at any event sponsored or co-sponsored by CCIX, Participants should refrain from disclosing to any other Participant any information that is not reasonably related to the legitimate purposes of the CCIX.

12. CCIX and each Participant, in connection with the activities of the CCIX, shall use their best efforts to comply with the Antitrust Laws.

13. CCIX'S general outside counsel shall act at CCIX's Antitrust Counsel to provide legal advice to CCIX regarding, and to take reasonable steps to actively supervise CCIX's compliance with, the Antitrust Laws. The Antitrust Counsel is, and shall continue to be a lawyer (or a law firm that employs a lawyer) who is admitted to practice law in one or more States of the United States, and who does not represent any Member in matters related directly to CCIX.

14. The Antitrust Counsel shall periodically provide training to the Board of Directors, any Chairs of any Committees, or to any employees or agents of CCIX concerning an overview of the Antitrust Laws as they apply to CCIX's activities, behavior, and conduct.

15. Any Participant may report to the Board of Directors or to the Antitrust Counsel any actual or potential violation of this Policy or the Antitrust Laws by any Participant, without fear of retaliation of any kind.

16. CCIX reserves the right to take any and all reasonable and appropriate disciplinary actions against any Participant who fails to comply with this Policy or the Antitrust Laws in connection with their participation in CCIX.

17. This Policy shall be promulgated to all Participants and all Participants shall abide by this Policy.

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CERTIFICATE OF SECRETARY OF CCIX CONSORTIUM, INC.

I, the undersigned, do hereby certify:

1. That I am the Secretary of CCIX Consortium, Inc.
2. That the foregoing Antitrust Policy (Version 1.0) constitute the Antitrust Policy of the said corporation adopted by the Board of Directors as of May 22, 2017.

DATED EFFECTIVE: May 22, 2017.

By: Veronique Guene
SHARRS, Secretary