

## GNI Antitrust Compliance Policy Statement

The Global Network Initiative (hereinafter, “GNI”) is a multi-stakeholder initiative comprised of companies, civil society organizations, investors, and academics (collectively, hereinafter, “GNI Members”) that seek to protect and advance freedom of expression and privacy. The policy of GNI and its members is to conduct all activities in strict compliance with all applicable antitrust and competition laws, in order to facilitate GNI’s legitimate and procompetitive public policy and legislative activities that help protect the freedom of expression and privacy rights of the public in the face of government challenges to those rights. It is therefore against the policy of GNI to sponsor, encourage or tolerate any discussion, communication, or agreement that might violate applicable antitrust or competition laws among any participants at a GNI event (including Board and other GNI meetings or calls). This includes, but is not limited to agreements, discussions, communications, or other communications concerning the following:

- prices, pricing policies, bids, discounts, employee salaries, promotions, terms of sale or credit, royalties, or license fees;
- costs or profits of individual companies, products, or services;
- offers or sales to any customer, within any territorial markets, or allocation of customers or markets;
- production quotas, output, capacity, inventory, or sales levels;
- the wages, salaries, or benefits of members’ employees (including executives), directors/trustees, contractors, consultants or other partners;
- boycotts and refusals to deal with particular companies, groups, governments, other entities, or individuals in any way that may violate antitrust or competition laws; or
- non-public information about an individual member’s or a guest’s future plans, including on investment, standards to be adopted, product launches, new product features, etc.;
- agreements concerning individual company decisions on whether to produce certain products, adopt certain product designs, or carry out specific product release dates or cycles.