

ANTITRUST POLICY OF THE THREAD GROUP

The Thread Group (the “Corporation”) intends to conduct its affairs in compliance with the antitrust and competition laws and regulations of the United States and, as applicable, of the states within the United States and of other countries (generally, “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 the Corporation and for its Participants. Accordingly, the Corporation hereby issues the following antitrust policy (the “Policy”) for itself and its Participants, as guidance in connection with participation in the Corporation’s activities.

Capitalized terms not defined herein will have the meaning set forth in Article III of the Bylaws of the Thread Group (“Bylaws”).

1. The activities of the Corporation are not intended to restrain competition. The purpose of the Corporation as it is stated in the Bylaws is intended to foster competition and to benefit consumers.
2. The Corporation and its Committees, Work Groups, and activities shall not be used for the purpose of bringing about or attempting to bring about any understanding, written or oral, formal or informal, express or implied, or concerted practices between and among competitors with the intent or effect to restrain competition in the market, and notably with regard to prices, terms or conditions of sale, distribution, volume of production, territories, customers, credit terms, or strategic, business, marketing or product development plans.
3. In connection with participation in the Corporation, there shall be no agreement or exchange of information among Participants that are actual or potential competitors regarding their prices, discounts, or terms or conditions of sale or licensing of products or services (except to the extent required under the Corporation’s IP Policy), pricing methods, profits, profit margins or cost data, production plans, market shares, sales territories or markets, allocation of territories or customers, or any limitation on the timing, cost or volume of their research, production, strategic, business, marketing or product development plans, or sales.
4. 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.
5. The Corporation and its Participants, in connection with their participation in the Corporation, 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.
6. The Corporation and its Participants, in connection with their participation in the Corporation, shall not attempt to prevent any person from gaining access to any market or customer for goods and 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. (This paragraph is not intended to preclude a Participant from disclosing and asserting its intellectual property rights.)
7. The qualifications for participation in the Corporation are as established by the Board of Directors of the Corporation. No applicant for participation, which meets the qualifications therefor, shall be denied

participation for any anti-competitive purpose. No Participant shall be excluded from a Committee or Work Group for any anticompetitive reason. For clarity, the Corporation may deny participation in accordance with any objective criteria established by the Board of Directors and applied in an even-handed and neutral manner.

8. To the extent that the Corporation recommends, develops, promulgates, approves, or adopts proposed standards, adherence to such proposed standards shall be voluntary on the part of Participants, and shall in no way be compelled or coerced by the Corporation or a Committee, Work Group, or Participant, it being solely a voluntary and unilateral decision on the part of the particular Participant or Participants as to whether to adhere to or comply with any such proposed standard.

9. Any standards that may be recommended, developed, promulgated, approved, or adopted by the Corporation in order to effectuate its purposes shall be based upon relevant considerations, and shall not be based upon any effort, intention, or purpose to unreasonably reduce or eliminate competition in the sale, supply, and furnishing of products and services.

10. The Corporation and its Committees and Work Groups shall not impose sanctions for the violation of, nor shall they enforce compliance with, standards developed, promulgated, approved, or adopted by the Corporation, except that the Corporation may condition use of its trademarks or certification marks on compliance with standards developed to regulate the use of and to protect such marks. For clarity, such conditions may be predicated on qualifying products and services pursuant to testing or certification procedures that the Corporation may establish, implement, or reference. The Corporation reserves the right to take appropriate action against any person or entity that engages in false or misleading advertising regarding use of or compliance with standards of the Corporation.

11. Each Participant hereby assumes responsibility to provide appropriate legal counsel to its representatives acting on such Participant's behalf regarding the importance of limiting the scope of their discussions to the topics that relate to the purposes of the Corporation, whether or not such discussions take place during formal meetings, informal gatherings, or otherwise.

12. Each Participant acknowledges that it is imperative that it and its representatives act in a manner that does not violate the Antitrust Laws.

13. This Policy is conservative and is intended to promote compliance with the Antitrust Laws, not to create duties or obligations beyond what the Antitrust Laws actually require. In the event of inconsistency between any provision of this Policy and the Antitrust Laws, the Antitrust Laws shall control.

14. This Policy shall be promulgated to all Participants. All Participants shall abide by this Policy.