

Antitrust Compliance Policy (As Adopted February 9, 2000)

Antitrust Laws

Antitrust laws exist in many countries to preserve and promote free and fair competition. Antitrust laws advance competition by preventing businesses and professionals from engaging in anticompetitive conduct such as price-fixing, market allocation, boycotts, monopolies, and other activities that limit free trade.

Policy

The antitrust laws of the United States are among the most important of all laws affecting associations such as the Open Mobile Alliance Ltd. (the “Open Mobile Alliance”). As a multi-national association, the Open Mobile Alliance may also be subject to other countries’ antitrust laws. However, the Open Mobile Alliance and its members are bound to follow the U.S. antitrust laws. It is the long-standing and undeviating policy of the Open Mobile Alliance to comply in all respects with the antitrust laws.

Education

To ensure compliance with federal and state antitrust laws, the Open Mobile Alliance members are responsible for understanding these laws. The Open Mobile Alliance Guidelines for Antitrust Compliance are adopted as a part of this Antitrust Compliance Policy. Members and the staff of the Open Mobile Alliance are urged to become familiar with the antitrust laws as set forth in the Guidelines for Antitrust Compliance. It is also the policy of the Open Mobile Alliance that educational presentations on antitrust issues are periodically presented to the membership and the staff.

Agenda

A detailed agenda is prepared for each meeting planned by the Open Mobile Alliance. If potential antitrust questions are raised by agenda items, they are reviewed in advance by legal counsel. The agenda is distributed to participants prior to the meeting.

Meetings

Meetings of the Open Mobile Alliance are regularly scheduled. Meetings follow the prepared agenda. Legal counsel is invited to be present at meetings at which antitrust sensitive issues are to be discussed.

Minutes

Accurate minutes are kept of all the Open Mobile Alliance Board of Directors meetings and the Open Mobile Alliance committee meetings. The minutes of the preceding meeting are read and adopted before the start of the following meeting. After the minutes have been adopted, they are promptly distributed to attendees.

Document Retention

Records of the Open Mobile Alliance reflect a factual, objective, and businesslike account of the activities of the Open Mobile Alliance without retaining useless or outdated information. Notes taken at meetings and drafts of documents having no further lasting value are discarded.

Other Sessions

All meetings or sessions held by the Open Mobile Alliance shall fully comply with this Antitrust Compliance Policy.