

## ULTRA ACCELERATOR LINK CONSORTIUM, INC.

### ANTITRUST POLICY (Version 1.0)

*Adopted as of October 4, 2024*

**Ultra Accelerator Link Consortium, Inc.**, a Delaware nonprofit corporation (the “**Corporation**”) 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 all market participants, including without limitation consumers and companies, to make the market more innovative and efficient. A violation of the Antitrust Laws can have serious consequences for the Corporation and for participating companies. Accordingly, the Corporation has adopted this Antitrust Policy (“**Policy**”) for itself, its Members (as such term is contemplated by the Corporation’s Bylaws), directors, officers, employees, and agents, and for all attendees, licensees, customers, and other participants (collectively referred to as “**Participants**”), to provide general guidelines for their participation in the work and other activities of the Corporation. The provisions in this Policy are stated in general terms and, as such, are not intended to be a final statement of any provisions of any applicable Antitrust Laws.

At all meetings of the Board of Directors or of any other committee, subcommittee, or work group of the Corporation 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 Ultra Accelerator Link Consortium, Inc. activities are subject to strict compliance with Ultra Accelerator Link 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: [INSERT A LINK] .**

1. The Corporation 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 the Corporation, 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; provided, however, this Policy shall not preclude the disclosure of a Participant’s technical information to the extent such disclosure is necessary to carry out the specification development activities of the Corporation.

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, with regard to or arising out of the work or other activities of the Corporation.

4. The Corporation and the 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 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 the Corporation or any Participant from asserting its intellectual property rights.

5. The Corporation and the 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 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 Corporation or any Participant from asserting its intellectual property rights.

6. The qualifications for participation in the Corporation are as established by the Certificate of Incorporation and Bylaws of the Corporation, 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.

7. To the extent that the Corporation 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 the Corporation; provided however that this guideline shall not prevent the Corporation from adopting testing and certification programs, as well as logo and trademark usage requirements tied to adherence with the Corporation'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 or on behalf of the Corporation, 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. In conducting any meeting of the Board of Directors, or any Committee, the chairperson or secretary at the meeting should generally: (i) prepare and follow an agenda; and (ii) prepare some minutes to reflect the general subjects discussed and any actions taken at such meeting.

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

11. The Corporation and each Participant, in connection with the activities of the Corporation, shall comply with the Antitrust Laws.

12. The Corporation may appoint an antitrust counsel to provide legal advice to the Corporation regarding steps the Corporation should take to comply with all applicable Antitrust Laws, including without limitation assisting the Corporation in providing periodic training to the Board of Directors, any chairpersons of any Committees, or to any employees or agents of the Corporation concerning an overview of the Antitrust Laws as they apply to the Corporation's activities, behavior, and conduct.

13. Any Participant may report to the Board of Directors, its officers, or to the Corporation's general outside counsel any actual or potential violation of this Policy or the Antitrust Laws by any Participant.

14. The Corporation 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 the Corporation.

15. This Policy shall be promulgated to all Participants and all Participants shall abide by this Policy, as of its Effective Date. Without limiting the generality of the foregoing clause in this Section 15, each Member (as such term is contemplated by the Corporation's Bylaws) of the Corporation acknowledges and agrees that by its execution of the Company's Participation Agreement each such Member and its Affiliates (as such term is defined in the Corporation's Bylaws) have thereby agreed and consented to, have become bound by, and have agreed to comply with, all of the terms and conditions of this Policy.

**CERTIFICATE OF SECRETARY OF ULTRA ACCELERATOR LINK CONSORTIUM, INC.**

I, the undersigned, do hereby certify:

1. That I am the Secretary of **Ultra Accelerator Link Consortium, Inc**
2. That the foregoing Antitrust Policy (Version 1.0) constitutes the Antitrust Policy of said Corporation adopted by the Board of Directors as of October 4, 2024.

DATED EFFECTIVE: October 4, 2024.

By:  Signed by:  
Barry Davis, Secretary