

**The Digital Commerce Alliance Association**  
**Antitrust Policy Statement**

The Digital Commerce Alliance Association (“DCA”) and its members acknowledge and understand that their activities must at all times be undertaken in compliance with all applicable laws and regulations, including but not limited to laws and regulations relating to antitrust and competition. In addition, all members are required to comply with the Bylaws of DCA and specifically section 6.9 “Compliance with Antitrust Laws”. These requirements are incorporated by reference into all DCA member agreements and form a binding obligation upon all DCA member companies.

Therefore, in carrying out its activities, it is the policy of DCA and its members to act at all times in accordance with, and strictly adhere to, the letter and the spirit of all applicable national and international antitrust and competition laws and regulations (“**Antitrust Laws**”). For this reason, DCA has promulgated this Antitrust Policy Statement (the “**Policy**”) to make clear its uncompromising intent to comply strictly in all respects with the Antitrust Laws.

DCA shall ensure that each of its members is made aware of, and has committed to compliance with, this Policy. Antitrust compliance is the responsibility of every DCA member, and each member must consult with its own counsel to ensure its own compliance with the antitrust laws.

**General Rules of Antitrust Compliance (the “Rules”)**

The following Rules are applicable to all activities of DCA and its members and must be observed in all situations and under all circumstances, formal and informal, without exception or qualification, other than as noted below.

1. Participants shall not discuss with each other any matter the intent or effect of which is to reduce or weaken competition between the participants. No activity of DCA or its members shall be used to bring about, or attempt to bring about, any understanding or agreement, whether written or oral, formal or informal, expressed or implied, among its members with regard to, but not limited to, price fixing, market sharing, bid-rigging, limiting production or supply, or boycotting.
2. Participants shall not share with each other any competitively sensitive information, including but not limited to discussions related to any participant's prices, costs, profits, margins, sales conditions, sales volumes, market share, or future competitive plans.
3. Participants shall not discuss or suggest working together to injure another competitor, supplier, or customer, such as a group boycott. Participants shall not engage in any conversation or activity that might be construed as an agreement to prevent any business entity from gaining or maintaining access to any market or to any customer.
4. Participants shall not, at DCA meetings, events, or activities, share customer lists or discuss the terms of any individually negotiated contracts created outside of DCA.

The foregoing is not an exhaustive list of conduct proscribed by the antitrust laws and it does not limit the ability of individual members of DCA to reach legitimate, arms-length agreements with other members that do not raise antitrust issues. DCA participants are responsible for fully complying with all applicable antitrust laws, and should consult with their own counsel if they have questions about the applicable law.

During meetings of DCA, an Antitrust Statement shall be read to remind the participants of their obligation to conduct themselves in accordance with the Policy and these Rules.