

The UnitVisID Antitrust Policy

The UnitVisID Alliance, Inc. (“**UnitVisID**”) intends to ensure the quality, performance, and interoperability of RFID tagged drug products as they move through the supply chain from the manufacturer, through the distributor, to the hospital and eventually into the patient, across all hardware or software systems, through the development of standards and certification programs. UnitVisID will conduct its affairs in compliance with the antitrust and competition laws of the United States and, as applicable, the antitrust and competition laws of the states within the United States and 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. Because members of UnitVisID may be competitors, it is particularly important to comply fully with the Antitrust Laws. The work of UnitVisID is intended to improve competition and facilitate competitive practices. Adherence to this Antitrust Policy will facilitate that purpose.

Violations of the Antitrust Laws may result in serious penalties for both companies and individuals. These penalties can include treble damage awards, fines, and injunctions. Individuals may be subject to criminal penalties. It is, therefore, important that everyone participating in any UnitVisID activity avoid subjects which could lead to anticompetitive conduct.

Prior to all meetings of UnitVisID, or its committees, working groups, and subgroups thereof, Members and any other attendees in that meeting should be reminded of their obligation to comply with this Antitrust Policy. Unless authorized by UnitVisID counsel in advance, the topics listed below should be avoided in such meetings. Additionally, these topics should not be raised in any communications, written or oral, in connection with UnitVisID activities, meetings, or events (such meeting and communications collectively “**UnitVisID Discussions**”).

Topics that should not be discussed among competitors:

Prices: One’s own prices or those of a competitor, or of any factors which might affect prices such as discounts, credits, margins, or the terms and conditions of sale.

Costs and/or Profits: Profits, profit margins, or cost data of one’s own, or those of a competitor.

Price-fixing: Agreement to raise, lower, or hold present or future price levels.

Division of Markets: Allocation of territories, markets, or customers.

Market/Supply Manipulation: Gaining access to any market or customer for goods and services, or preventing any person from obtaining a supply of goods or services or otherwise purchasing goods or services freely in the market, i.e., restrictions upon production, boycotts, refusals to deal, or selection, rejection, or termination of customers or suppliers.

Other: Any other discussion that reasonably might lead to anticompetitive conduct, i.e., comparisons based on non-public information disclosing product performance, standards conformance, or quality.

If one of the above topics is raised in any UnitVisID Discussion, persons involved should object and request that no further discussion of the topic take place until the topic can be reviewed by counsel for UnitVisID.

Each individual participating in UnitVisID on behalf of a UnitVisID Member is encouraged to review this Antitrust Policy and seek legal counsel from the applicable Member such individual is representing.