

FieldComm Group

Antitrust Compliance Policy

For Internal Use Only

A small, handwritten mark or signature in the bottom right corner of the page, consisting of a stylized, cursive-like character.

Antitrust and Competition Compliance Policy

Table of Contents

1. Introduction.....	3
2. Scope of Policy.....	3
3. Violations.....	3
4. Background.....	3
5. Policy.....	3
6. Activities Affecting Competitors.....	5
7. Questions and Guidance.....	5



1. Introduction

The FieldComm Group (“Group”) is a global cooperation that brings together industrial automation end users and manufacturers working together to develop digital FieldCommunication standards and an integration technology to be applied in conjunction with the Group’s communication technologies and the Group’s configuration technology. Consistent with its mission, and to foster compliance with all applicable antitrust and competition laws, the Group has adopted this Antitrust & Competition Compliance Policy.

2. Scope of Policy

This policy applies to all contractors, volunteers, employees or officers and directors of the Group, and all other participants in the Group activities (collectively termed, “Participants”), e.g. employees of members participating in the Group activities (including committees and other subgroups). Compliance with the policy is mandatory. The Participants are also strongly encouraged to comply with their employer’s or other sponsoring company’s antitrust policy.

3. Violations

For the Group employees, violations of this policy can result in termination of employment. For other Participants, violations of this policy can result in restrictions or complete bans on an individual’s or company’s participation in the Group activities. Individuals and companies may also be subject to criminal fines, imprisonment, civil damages (e.g., three times actual damages in the US), and attorneys’ fees.

4. Background

Antitrust and competition laws forbid any agreement verbally or in writing between or among competitors that unreasonably restrains competition. “Reasonableness” is judged by the agreement’s effects on the competitive process. Some agreements (such as agreements between competitors to fix prices, allocate customers, divide markets, or limit output) are so clearly anticompetitive that they are automatically illegal and as per some jurisdictions likely to result in criminal prosecution. Other antitrust laws in other jurisdictions might also apply and may impose even more restrictive provisions on the Participants.

5. Policy

Participants in the Group activities (including committees and other subgroups, as defined in #1) shall, in particular, refrain from the following whenever the conduct could reasonably be believed to be part of the Group activities (e.g., at the Group meetings, during the Group

conference calls, or in informal discussions surrounding or contemporaneous with formal the Group activities):

- Discussions involving prices or pricing information, especially rebates/discounts, margins, profits, and internal cost information and Participants' (or Participant's employer's) expectations as to their future prices or internal costs information.
- Discussions involving information on production output and/or capacity.
- Discussions of Participants proprietary strategies and future conduct in the market.
- Discussion of Participants' supply network.
- Discussions regarding how customers, business opportunities and geographical areas are to be divided among actual or potential competitors.
- Discussions between actual or potential competitors regarding coordination of offers to customers.
- Discussions concerning the exclusion of actual or potential competitors from markets.
- Discussions concerning boycotting or group refusals to deal with actual or potential competitor(s), vendor(s), or supplier(s).
- Discussions of any other competitive sensitive topic.

To the extent that the FieldComm Group Bylaws does not impose more specific requirements, meetings shall be called by an officer of the Group or the designated lead of the respective working group. Meetings of the Participants should be conducted in accordance with an agenda circulated reasonably in advance and minutes (including a list of participants) shall be taken and distributed to those who participated in the meeting. If the chairperson of the meeting or any participant has a reasonable doubt regarding the compliance of a particular topic with antitrust laws, the discussion of such topic shall not continue until such doubt has been cleared, if necessary by legal advice. If need be, as a last resort, the meeting chairperson shall abandon the entire meeting and/or participants shall leave the meeting.

Any relevant action, including, but not limited to, an oral request by the chairperson or any participant, discontinuation of a particular topic, leaving of a meeting by a participant, abandoning of a meeting, etc., shall be documented in the minutes including detail such as time and names of involved participants.

6. Activities Affecting Competitors

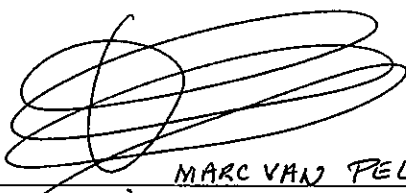
From time to time the Group's mission may require the Group to make business decisions or undertake other legitimate activities that may affect the commercial interests of specific companies. Those decisions and actions should be undertaken only to advance the Group's mission or for another legitimate business purpose and not for the purpose of giving an industry participant or group of participants a competitive advantage over other participants.

To the extent such activities include discussions and the adoption of rules which may define technical or quality requirements with which current or future products, production processes, services or methods may comply (i.e., setting of standards), the FieldComm Group is committed to ensure that participation in such discussions and the adoption is unrestricted and that the procedure for adopting such rules is transparent. Furthermore, the FieldComm Group will ensure effective access to such standards on fair, reasonable and non-discriminatory terms. In the case of standards involving Intellectual Property (IP), the FieldComm group shall follow its IP Policy which ensures effective and non-discriminatory access to such standards.

7. Questions and Guidance

Every Group employee and every other Participant in the Group activities is responsible for ensuring compliance with this policy and with applicable antitrust and competition laws. The Participants (other than the Group employees) should consult their company's antitrust counsel for guidance on antitrust compliance generally. Questions about this policy should be directed to the Board of Directors.

This Antitrust Compliance Policy has been approved and adopted by the Board of Directors of the FieldComm Group on DD MMM YYYY.



MARC VAN FELT
Secretary 25 SEPTEMBER 2014