

Appendix A

Gaming Standards Association Antitrust Policy Statements and Guidelines

Introduction

It is the policy of the Gaming Standards Association (“GSA”) and its members to strictly comply with all laws applicable to Association activities. Association activities involve cooperative undertakings and meetings of competitors. It is important to emphasize the on-going commitment of our members and GSA to fully comply with all federal and state antitrust laws. This statement is being distributed at GSA meetings as a reminder of that commitment and as general guidance for activities and meetings. This policy is complemented by GSA’s Antitrust Compliance Manual.

Responsibility for Antitrust Compliance

GSA's structure has been fashioned and its program is carried out in conformance with antitrust standards. An equal responsibility for antitrust compliance – which includes avoidance of even an appearance of improper activity – is yours. Your corporate employer and this Association depend on your good judgment to avoid all discussions and activities which may be improper. Association staff members work conscientiously to avoid subject matter or discussion which may have unintended implications, and counsel for the Association will provide guidance with regard to these matters. It is important to realize that the competitive significance of a particular conduct or communication is probably most evident to you, as being directly involved in the Industry.

Antitrust Guidelines

In general, the antitrust laws seek to preserve a free competitive economy and trade in both the United States and in commerce with foreign countries. Competitors may not restrain competition among themselves with reference to the price, the quality or the distribution of their products, and they may not act in concert to restrict the competitive capabilities or opportunities of their competitors, suppliers or customers.

Penalties for violating the antitrust laws are severe: (1) corporations are subject to heavy fines and injunctive decrees and may have to pay substantial damage judgments to injured competitors, suppliers or customers; and (2) Individuals are subject to criminal prosecution, and may be punished by fines and imprisonment.

You should read and observe the following guidelines:

1. ***Don't*** discuss with other members your own or your competitors' prices, or elements that might affect prices such as costs, discounts, terms of sale, or profit margins.
2. ***Don't*** stay at a meeting where discussions concerning price are taking place.
3. ***Don't*** make public announcements or statements about your own prices or those of competitors at Association functions.

4. ***Don't*** discuss what individual companies plan to do in particular geographic or product markets or with particular customers.
5. ***Don't*** disclose to others any competitively sensitive information.
6. ***You Must*** conduct all GSA business meetings in accordance with Association rules. These rules require that an Association staff member be present, the agenda be followed and minutes be kept.
7. ***You Must*** confer with counsel before bringing up any topic or making any statement with competitive ramifications.
8. ***You Must*** send copies of all Association related correspondence to the staff member involved in the activity.
9. ***You Must*** alert the Association staff to any inaccuracies in proposed statements to be made by the Association on behalf of the gaming Industry, particularly statements to government officials.

Finally, remember that meetings with government officials may not provide a shield against antitrust liability.

Conclusion

Compliance with these guidelines involves not only avoidance of antitrust violations, but avoidance of any behavior which might be construed as a violation. Bear in mind that the antitrust laws are stated in general terms and that this statement is not a summary of applicable laws. This statement is only intended to highlight and emphasize the principal antitrust standards which are relevant to GSA programs. You must, therefore, seek the guidance of either Association counsel or your own corporate counsel when antitrust questions arise.