

Policy on Integrity of the Game & Enforcement of Competitive Rules

The following memorandum was sent on June 5, 2008 to Chief Executives, Club Presidents, General Managers, and Head Coaches from Commissioner Goodell regarding the Policy on Integrity of the Game & Enforcement of Competitive Rules:

1. Duty to Certify Compliance with League Rules – The Chief Executive, President, General Manager, and Head Coach will be required by March 1 of each year to certify in writing that (a) the club has reported all violations of competitive rules of which it was aware; and (b) that the club was not guilty of any such violations during the preceding year. Any of these club employees who leaves the club prior to March 1 shall be required to make the certification as of the last date of his employment at the Club. A certification form is attached. Specifically, the certification includes, but is not limited to, the following: violations of the "equity rule" relating to game-day facilities or tampering with the use of any equipment properly available to an opposing team, or unauthorized use of computers or electronic equipment on game day; interference with a team's or stadium's game-day communication systems, or unauthorized use of game-day frequencies; unauthorized videotaping on game-day or of practices, meetings, or other organized team activities; unauthorized and/or unreported miking of players on game-day or other forms of electronic eavesdropping; unauthorized entry into locker rooms, coaches' booths, meeting rooms or other private areas; violations of the anti-tampering policies; violations of player personnel or eligibility rules; tampering with any game-day clocks or timing equipment; or artificially increasing "crowd" or other noise levels in a stadium.

Further, each signatory will be required to certify that he has no knowledge of any betting on NFL games, of any efforts to influence or alter the outcome of any game, of any sharing of non-public information with gamblers or persons with an interest in any gambling-related enterprise, or any prohibited association with gamblers.

Each signatory will also be required to certify that he has no knowledge of the sale, use, or distribution of substances prohibited by the NFL Policy and Program on Anabolic Steroids and Related Substances. No club will be deemed to violate this aspect of the certification merely because a player tests positive under the Steroids Program.

Failure to file the certification in a timely manner, or the filing of a false certification, shall be considered conduct detrimental to the League and will subject the offending club and responsible individual(s) to appropriate discipline.

We also strongly recommend that owners and other senior executives require others in the organization who may have relevant knowledge to certify their compliance with competitive rules and that they have reported any violations. A certification that could be used for this purpose is also attached.

Page C8 *Volume I, Administrative/Business Operations – League Rules & Policies*

2. Duty to Investigate and Cooperate - Actual or suspected competitive violations will be thoroughly and promptly investigated. Any club identifying a violation is required promptly to report the violation, and give its full support and cooperation in any investigation. Failure to cooperate in an investigation shall be considered conduct detrimental to the League and will subject the offending club and responsible individual(s) to appropriate discipline.
3. Duty to Disclose – The Chief Executive, President, General Manager, and Head Coach shall have an affirmative duty to promptly report any actual or suspected competitive violations to Ray Anderson, Executive Vice President for Football Operations. In a case involving self-reporting (i.e., where the violation was committed and is being reported by the same club), the report should include both a detailed explanation describing the violation and why it occurred, and a detailed statement of corrective action taken by the club to insure that the violation does not occur again.

Failure to report an actual or suspected violation shall be considered conduct detrimental to the League and will subject the offending club and responsible individual(s) to appropriate discipline.

A club or individual reporting a violation is expected to do so in good faith, to have a reasonable basis for believing a violation occurred, and to produce (or to identify) evidence to substantiate the claim. In the event I determine that a claim is made in bad faith, is frivolous, or that the club or person making the complaint is unable or unwilling to produce evidence to support the charge, I will impose appropriate sanctions.

4. Standard of Proof Required to Sustain a Violation and Disciplinary Considerations – The standard of proof required to find that a violation of competitive rules has occurred shall be a Preponderance of the Evidence. This is the degree of evidence that is of greater weight or more convincing than the evidence which is offered in opposition to it. It means that, as a whole, the fact sought to be proved is more probable than not.

Where a competitive violation is proved under this standard, I will impose discipline based on all relevant facts and circumstances, including the nature and materiality of the violation, the prior record of the party committing the violation, prior treatment of similar violations, the extent to which the club and relevant individuals cooperated with the investigation, and, insofar as possible, the actual competitive impact of the violation.

Disciplinary matters, including hearings and appeals, shall be processed pursuant to Article 8 of the NFL Constitution and Bylaws.

5. Confidentiality – Confidentiality must be maintained when conducting an investigation and when reporting information to the League office. Clubs are required to take appropriate steps to ensure that information concerning actual or suspected violations is reported and remains strictly confidential, and that no

Volume I, Administrative/Business Operations – League Rules & Policies **Page C9**

inadvertent or intentional disclosures are made to unauthorized persons. The effectiveness of this policy rests largely on adherence to maintaining the confidentiality of information; therefore, any unauthorized disclosures will be thoroughly investigated and will result in disciplinary action where appropriate.

Similarly, any actual or threatened retaliation against a person who makes a report in good faith will be grounds for disciplinary action.

Should you have any questions concerning this policy, please contact Ray Anderson or Jeff Pash. Thank you.

Integrity of the Game

CERTIFICATION

(For use by Principal Owner/Chief Executive, President/General Manager, and Head Coach)

Pursuant to Section 8.13 (A) of the NFL Constitution and Bylaws, each of the undersigned certifies that to the best of his information and belief, and after having made appropriate inquiries of persons likely to have knowledge of these matters,

the _____ complied with all League
(Name of Club)

competitive policies for the _____ season, and each of the undersigned further certifies

that _____ has not engaged in any of the
(Name of Club)

following prohibited acts:

violations of the "equity rule" relating to game-day facilities, tampering with the use of any equipment properly available to an opposing team, unauthorized use of computers or electronic equipment on game day, interference with a team's or stadium's game-day communication systems, unauthorized use of game-day frequencies, unauthorized videotaping on game-day or of practices, meetings, or other organized team activities, unauthorized and/or unreported miking of players on game-day, or electronic eavesdropping; unauthorized entry into locker rooms, coaches' booths, meeting rooms or other private areas; violations of the anti-tampering policies; violations of player personnel or eligibility rules; tampering with any game-day clocks or timing equipment, or artificially increasing "crowd" or other noise levels in a stadium during the reporting period.*

Each of the undersigned further certifies that he has no knowledge of any bets placed on any NFL game; of any effort to influence or alter the outcome of any NFL game by gamblers or their associates; of the sharing of any non-public information with gamblers or their associates; or of any prohibited associations with gamblers, and that he has not violated any NFL rules in these respects.

Each of the undersigned further certifies that he has no knowledge of the sale, distribution, or use by any club employee, including any player, of any substance prohibited by the NFL's Policy and Program on Anabolic Steroids and Related Substances.

Each of the undersigned further certifies that the _____
(Name of Club)

Integrity of the Game

CERTIFICATION

(For use by club personnel other than Principal Owner/Chief Executive, President/General Manager, and Head Coach)

I have been advised that our club's principal owner/chief executive, president/general manager, and head coach are required to make certain certifications to the Commissioner regarding compliance with competitive rules and reporting of actual or suspected violations of those rules. These certifications are being made pursuant to Section 8.13 (A) of the NFL Constitution and Bylaws.

I understand that I have been asked to certify the extent of my own compliance and knowledge regarding violations of these competitive rules. Accordingly, I hereby certify that to the best of my information and belief, and after having made appropriate inquiries of other persons likely to have knowledge of these matters,

the _____ complied with all League
(Name of Club)

competitive policies for the _____ season, and I further certify

that _____ has not engaged in any of the
(Name of Club)

following prohibited acts:

violations of the "equity rule" relating to game-day facilities, tampering with the use of any equipment properly available to an opposing team, unauthorized use of computers or electronic equipment on game day, interference with a team's or stadium's game-day communication systems, unauthorized use of game-day frequencies, unauthorized videotaping on game-day or of practices, meetings, or other organized team activities, unauthorized and/or unreported miking of players on game-day, or electronic eavesdropping; unauthorized entry into locker rooms, coaches' booths, meeting rooms or other private areas; violations of the anti-tampering policies; violations of player personnel or eligibility rules; tampering with any game-day clocks or timing equipment, or artificially increasing "crowd" or other noise levels in a stadium during the reporting period.*

I further certify that I have no knowledge of any bets placed on any NFL game; of any effort to influence or alter the outcome of any NFL game by gamblers or their associates; of the sharing of any non-public information with gamblers or their associates; or of any prohibited associations with gamblers, and that I have not violated any NFL rules in these respects.

Volume I, Administrative/Business Operations – League Rules & Policies **Page C13**

I further certify that I have no knowledge of the sale, distribution, or use by any club employee, including any player, of any substance prohibited by the NFL's Policy and Program on Anabolic Steroids and Related Substances.

I certify that I have reported all actual or suspected violations that I became aware of, including actual or suspected violations committed by the club, any club employee, or third parties, as required pursuant to club policies.

Any exceptions to the above representations are set forth on the attached page(s).

(Date)

(Name and Position of Signatory)

* Reporting period is from February 28 of the current year to March 1 of the following year.