**GREEN IP LIMITED'S ANTI BRIBERY CORRUPTION POLICY**

## 1. Policy Statement

It is Green IP Limited's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery. This Third-Party Anti-Corruption and Bribery Policy (the "**Policy**") represents the minimum standards that Green IP Limited has set. It aligns with the requirements of applicable laws, and suppliers who wish to work with Green IP Limited must agree to the terms of this Policy.

## 2. Compliance With Anti-Corruption And Bribery Laws

We take our legal responsibilities very seriously. Green IP Limited is bound to comply with the laws of all the places in which it does business, including but not limited to the United Kingdom (which includes the Bribery Act 2010) and the United States of America (which includes the Foreign Corrupt Practices Act 1977). Green IP Limited may be liable for the third parties we engage to perform services by or on our behalf ("**Suppliers**") if they act contrary to these laws. In some cases, local laws and regulations that apply to the activities described in this Policy may be more restrictive than this Policy. Where that is the case, the more restrictive rules must be followed.

## 3. Ensuring Compliance By Suppliers

This Policy applies to any third-party Suppliers who are providing goods and/ or services to Green IP Limited. Green IP Limited is committed to working only with Suppliers who embrace standards of ethical behaviour that are consistent with its own. All Suppliers who receive a copy of this Policy are required to adhere to its principles.

## 4. Policy And Controls

The Directors of Green IP Limited have overall responsibility for the effective operation of this Policy, assisted by the legal resource of Green IP Limited ("**Green Legal**"). This Policy is reviewed regularly. Suppliers (or those acting on their behalf) must not:

- offer or give, directly or indirectly, money or anything else of value to any person or organisation that is intended to, or could be seen as an attempt to influence or reward them to behave improperly in order to obtain or retain business or secure a business advantage for themselves, their organisation or Green IP Limited;

- request or accept, directly or indirectly, money or anything else of value if it is intended, or could be seen as an attempt, to compromise their independence or

judgement, or to improperly influence a business decision for themselves, their organisation or Green IP Limited;

- offer, promise, give, request or agree to receive or accept any gifts, honoraria, or invitations to social and entertainment events on behalf of Green IP Limited;

- offer, promise, give, request or agree to receive or accept any hospitality on behalf of Green IP Limited unless it has been specifically agreed in their written service contract or approved in writing by the Directors of Green IP Limited;

- make any charitable, community, academic or political contributions on behalf of Green IP Limited, regardless of whether such payments are nominal in amount;

- allow personal, financial, family or other interests to influence their independence or professional duties and decisions as Suppliers of Green IP Limited;

- give, promise to give, or to offer, a payment, gift or hospitality to a government official, politician, political party, agent or representative to "facilitate" or expedite a routine procedure;

- give, promise to give, or offer, a payment, gift or hospitality to a foreign government official, or any other person, knowing that the payment or promise will be passed on to a foreign government official; and

- accept or make facilitation payments or "kickbacks" of any kind.

## 5. Investigations, Proceedings and Ongoing Training

Suppliers must implement a process whereby incidents are reported to Green IP Limited, investigated and recorded quickly and appropriately. Any recommended remedial actions must be fully implemented. If reasonably requested by Green IP Limited, Suppliers should update Green IP Limited as to the remedial actions taken in response to any incidents of bribery or corruption (or potential incidents of bribery or corruption) which have been identified. Suppliers must carry out appropriate training in respect of anti-bribery and anti-corruption on an ongoing basis and ensure that those acting on a Supplier's behalf are aware of such Supplier's obligations under this Policy.

Green IP Limited will seek to support Suppliers who raise genuine concerns under this Policy, even if they turn out to be mistaken. Green IP Limited is committed to ensuring that no-one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place. Green IP Limited may terminate our working relationship with Suppliers if they breach this Policy.

If you are unsure whether a particular act constitutes bribery or corruption, or if you have any queries on this Policy, please contact Green IP Limited at hello@greenip.co.uk and include the subject line on your email: "**Supplier Anti-Bribery Policy**".