

ANTI-BRIBERY AND CORRUPT PRACTICES POLICY

1. REASON FOR POLICY

The coming into force of the UK Government's Bribery Act 2010 provided an opportunity for Haseltine Lake's Management Committee to review the firm's safeguards against bribery and corrupt practices and to create a clear policy to ensure compliance not only with current legal requirements but also with best practice.

Our over-riding objective is to act honestly and ethically in everything that we do, consistent with our obligations as professionals and trusted advisers. The purpose of this policy is to provide clear guidance to all Haseltine Lake personnel as to the conduct and behavior that is consistent with that objective and with particular regard to safeguarding the business against any direct or indirect involvement in bribery or corrupt practices.

2. RISK ASSESSMENT

At the request of the Management Committee, the Chief Executive has conducted a full risk assessment in relation to bribery and corrupt practices in the context of our normal business activities. The conclusion of the Chief Executive was that both the opportunities for and the risk of Haseltine Lake personnel becoming involved in bribery or corrupt practices are very low. In so far as risk does exist it is most likely to arise in the following contexts:

- Giving Gifts, Gratuities and Hospitality to Clients and Business Associates
- Accepting Gifts, Gratuities and Hospitality from Clients, Business Associates and Suppliers
- Activities of Overseas Agents on our behalf

This policy will provide guidance in relation to each of these areas of risk.

3. WHAT CONSTITUTES BRIBERY OR CORRUPT PRACTICES?

The Bribery Act 2010 creates three main offences:

- bribing a person to induce or reward them to perform a relevant function improperly
- requesting, accepting or receiving a bribe as a reward for performing a relevant function improperly
- using a bribe to influence a foreign official to gain a business advantage.

Note that it is an offence not only to offer or accept a bribe but also to request one.

For the purposes of this policy, Corrupt Practices can be defined as any business practice which, while not falling within the statutory definition of bribery, nevertheless gives rise to an unfair or inappropriate benefit to an individual or to the firm in a way which would generally be regarded within the European Professional services sector in which we operate as dishonest or unethical.

Haseltine Lake is emphatically and unequivocally opposed to any and all forms of bribery and corrupt practices. Aside from any implications within the Criminal Law, it will be a very serious disciplinary offence for any employee to knowingly or negligently engage in bribery or corrupt practices.

4. GIVING GIFTS, GRATUITIES AND HOSPITALITY

We must never provide gifts or hospitality with the intention of influencing anyone to act improperly or of influencing a public official in the performance of his duties.

In some countries, the giving of gifts or the extending of business hospitality is an established aspect of the business culture. Our policy does not prohibit giving promotional or personal gifts of low value or extending appropriate hospitality, provided that such gifts and hospitality are given to indicate regard for the individual in question and for the business relationship rather than to induce them to act improperly.

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You can seek guidance from the firm's marketing department or from any partner as to what is appropriate in any given context or region. As a very general guide, gifts to individuals should not normally have a value in excess of £50. Hospitality should involve sharing (as opposed to gifting or providing) good quality food and drink but should not be lavish or extravagant in the local context.

There are almost no circumstance which it would be appropriate to give a gift of money. One exception to this general rule might be a gift of ceremonial or special edition coinage – but subject to the value parameters set out above.

The provision of refreshments and small gift items in the context of free Haseltine Lake seminars and events to our clients and contacts will generally be considered acceptable.

5. ACCEPTING GIFTS, GRATUITIES AND HOSPITALITY

We must never accept gifts, gratuities or hospitality from any third party where we know or suspect that the intention of the donor is to influence us to act improperly.

In some countries, the giving of gifts or the extending of business hospitality is an established aspect of the business culture. Our policy does not prohibit accepting promotional or personal gifts of low value or accepting appropriate hospitality, provided that such gifts and hospitality are clearly offered to indicate the donor's regard for the recipient and for the business relationship with Haseltine Lake rather than to induce the recipient to act improperly.

You can seek guidance from any partner as to what is appropriate in any given context or region. As a very general guide, gifts to individuals should not normally have a value in excess of £50. Hospitality should involve sharing good quality food and drink but should not be lavish or extravagant in the local context.

There are almost no circumstance which it would be appropriate to accept a gift of money. One exception to this general rule might be a gift of ceremonial or special edition coinage – but subject to the value parameters set out above.

In accepting any gift or hospitality you should satisfy yourself that the motives of the giver appear appropriate and consistent with Haseltine Lake's honest and ethical approach to doing business. If you have any doubts or misgivings you should decline the gift – even if this may cause offence.

6. ACTIVITIES OF OVERSEAS AGENTS ON OUR BEHALF

The sub-contracting of work to overseas patent and trademark attorneys is common practice among European attorney firms and is a key element of our business model. Because of the very wide spread of jurisdictions in which we operate and the large number of agents that we use, it is not possible for us to provide close monitoring of the activities of all our agents. Nevertheless we should take every reasonable opportunity to communicate our stance on bribery and corruption. This is especially important when we are working with new firms or new individuals within firms, where a relationship of trust has not yet been established.

So far as we are aware, the offering of "facilitation payments" (that is, typically small, unofficial payments made to secure or expedite a routine government action by a government official) are not generally commonplace in the IP world. There are however some jurisdictions in which facilitation payments are generally prevalent and may therefore extend to the IP world. We must remain alert to any suggestion that any such payments could be offered and must make it clear that we do not require or condone any such payments to be made on our behalf or on behalf of our clients.

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7. SEEKING GUIDANCE AND RAISING CONCERNS

Employees are encouraged to seek guidance from the Partners or the Chief Executive at any time in relation to any aspect of this policy or its practical application to any actual or hypothetical situation. Employees should also feel able to raise concerns in confidence about the conduct of any supplier, agent or colleague. No employee will suffer any detriment as a result of raising genuine concerns about the application of this policy to any given circumstances or individuals.

8. REVIEW OF POLICY

This policy and the underlying risk environment against which it seeks to provide protection will be reviewed by the Management Committee at annual intervals or in the light of any evidence which suggests that changes may be necessary

Lesley Evans
Chief Executive
August 2016