

Public consultation on the Rules of Procedure for the Unified Patent Court

Introduction

The IP Federation represents the views of a significant number of major innovative UK companies in matters concerning intellectual property policy. A list of members is attached. Not only do our companies own considerable numbers of IP rights, both in Europe and internationally, but they are affected by the activities and IP rights of competitors. They may be either plaintiffs or defendants in IP related court actions.

The consultation

The draft Rules of Procedure for the Unified Patent Court have been prepared by a drafting Committee of expert judges and lawyers, and have been the subject of technical consultations with professional and industry bodies. As from 25 June 2013 until **1 October 2013** the draft [Rules of Procedure](#) are open to written comments from stakeholders or other interested parties. Respondents are requested to send them to:

secretariat@unified-patent-court.org

Comments of IP Federation on draft Rules of Procedure

In this paper, as well as identifying specific rules which it requests be amended, IP Federation identifies rule language where it has questions on the intended meaning of the rules. In these latter cases, IP Federation suggests that the Rules should be clarified so that the meaning is clear.

Comments on major issues are arranged by topic: a number of individual miscellaneous comments are also made.

Procedural appeals

We are strongly of the view that the Court of Appeal should be empowered to grant permission to appeal procedural decisions when the first instance division has refused permission. We are of this view because of the great importance of harmonisation of procedure between divisions. We recognise that procedural appeals have the potential to slow down cases. To this there are two answers. First, procedural appeals should be expedited. Second, the Court of Appeal will only take cases where it is appropriate to do so, and once procedures have been harmonised, the number of such appeals will greatly diminish. In any event harmonisation is paramount.

Amicus briefs for appeals

We believe that interested parties should be permitted to submit amicus briefs in appeals. We do not believe that there should be limitations on who may submit such briefs, though we do believe that there should be some limit on the length of briefs. We believe that amicus briefs should not be permitted in first instance cases, since this could overly burden the Court.

Avoidance of introduction of new evidence into appeals

We note that r.222.2 is permissive of new evidence being introduced on appeal. Whilst (as required by Art 73(4)) this is only when the party could not reasonably have introduced the new facts and evidence at first instance, we are concerned that there should be a clearer presumption against new facts and evidence being introduced. We suggest the rule is re-written as:

2. Requests, facts and evidence which have not been submitted by a party during proceedings before the Court of First Instance shall be disregarded by the Court of Appeal unless the party seeking to lodge new submissions is able to justify that the new submissions could not reasonably have been made during proceedings before the Court of First Instance. The Court may also take into account -

- (a) whether the new submissions are highly relevant for the decision on the appeal,
- (b) the position of the other party regarding the lodging of the new submissions.

Amendment of patents

We are concerned that Article 65 and Article 138(3) EPC together give inadequate basis for amendment of patents. Whilst there would appear to be basis for amending claims, the position with regard to the specification is much less certain. We therefore invite the Rules Committee to consider this point and possibly in r.30.1(a) delete "and/or specification".

We are also unclear as how applications to amend will come to the attention of third parties who may be affected and who may wish to oppose the application to amend. Consideration should be given to whether provision should be made to require advertisement of amendments, or to whether any proposals to amend should appear (promptly) on the EPO Register. If it is thought that intervention specifically for the purpose of opposing amendments should be permitted, a rule should be provided accordingly - for example by way of an addendum to r.313.2.

We are unclear as to the relationship between the EPO and the UPC as regard amendments given the possibility of long-running oppositions (and to a lesser extent Article 105A EPC limitation proceedings). We assume that decisions of the EPO will in effect override decisions of the UPC as is presently the case with regard to national proceedings. Whilst not a matter

for the Rules of Procedure, we regard this situation as deeply unsatisfactory. We are, of course, aware that this situation has persisted since the EPC system came into being and affects all national litigation. However, in the context of a new European Court, we believe it is an issue which should be considered in the context of a future EPC and/or UPC revision to give primacy to the UPC, at least so far as concerns unitary patents and designations of EPs in contracting UPC states and where a final decision of the UPC has been taken before the conclusion of the EPO proceedings.

Stays of proceedings

By way of initial observation, we note the intention to bring UPC actions to trial within one year (see preamble to Rules). Stays are therefore contrary to this basic principle and should be ordered only exceptionally. Further, mandatory stays should be avoided: a stay should always be discretionary unless explicitly required by the UPC agreement (e.g. Article 33(6)).

We believe that the rules concerning stays, especially in pending EPO opposition proceedings, are in need of tightening up so as to comply with the wording of Article 33(10) UPC Agreement which is explicitly permissive of a stay “when a rapid decision may be expected from the European Patent Office”. In respect of stays pending EPO decisions, we are concerned that there should be no mandatory stays at all, and no discretionary stays other than when a rapid decision is expected, given the duration of many EPO proceedings.

There are three rules in particular where the stay provisions require examination, r.295, r.118 and 70.3.

R.295(a) should make a specific reference to the expectation of an imminent decision of the EPO. We believe that, given this general provision, there is no need for any other rule to say anything about stays pending EPO proceedings. Hence, reference to EPO decisions should be deleted from r.118.3(b). If this is not done, then there may be a mandatory stay under r.118.3(b) pending the EPO decision, even though the EPO decision may not be expected for many years. This would be unacceptable and contrary to Article 33(10).

Also in relation to r.118.3, we wonder why it is required at all. This may, in part, depend on the meaning of the words introducing the rule “if a revocation action is pending ...”. (In r.118.3 and 118.4 we note the use of different terminology which may cause confusion. In 118.3 (first line) the words used are “revocation action” but we wonder if this is intended to cover only a stand-alone revocation action or also a bifurcated action. In this regard we note the use in 118.4 of the words “a direct action or a counterclaim for revocation”. This language could be made clearer to avoid doubt.) Under r.37.4 a decision has already been taken whether to bifurcate the case which includes the possibility of staying the infringement action. There is also the general power to stay under r.295. Is it really contemplated that an infringement action (whether bifurcated; or with a counter-

claim for revocation, but with another stand-alone revocation action pending in the central division) would be permitted to continue to trial, but that the infringement court could then decide under r.118.3 to stay the case? Note that r.118 is under the chapter concerning the oral procedure, and specifically part of the rule on the decision on the merits such that we are in effect at trial. Surely it cannot be contemplated that the parties could appear at the oral hearing only to be told that the Court had decided to stay the case. Again we suggest that all that is needed is the general powers to stay under r.295, and that r.118.3(b) is deleted in its entirety.

If what was intended was to give guidance in the taking of a decision as to whether or not to bifurcate; and if there is bifurcation, what to do with the infringement action, then an amended version of r.118.3(b) should be incorporated into r.37.4, but without reference to EPO proceedings. If so, we see the need only for a discretion to stay, and no mandatory element for the reasons given above.

In relation to r.70.3, we see no reason why a stay should be mandatory when a revocation action is followed by a claim for infringement started in a different division. We note that Article 33(5) does not require this in contrast to Article 33(6), and hence making any stay mandatory is contrary to the clear intentions of those drafting the UPC Agreement. A mandatory stay is therefore arguably *ultra vires*, and is certainly not needed. Further, new rule 70.4 is only a partial answer to this issue. If r.70.3 is maintained, then notwithstanding r.70.4, the “judicious” timing of commencement of an infringement action may cause postponement of a trial of a revocation action without any flexibility. It is important to allow potential defendants to “clear the way” efficiently, and hence this rule is contrary to that objective.

Bifurcation / timing

As is well known, all defendants are concerned at the possibility of an “injunction gap” in bifurcated actions. There is also an interest for plaintiffs to have a full decision on the merits as soon as is practical. We note the deletion of r.40(b) of the 14th draft. This required the central division to accelerate bifurcated revocation claims. We fully approved of this rule because it mitigated the possibility of an injunction gap. We understand that this rule was deleted so that the central division was not clogged up by bifurcated cases which had to be given priority, but consider this is not an adequate reason. The Court should be adequately staffed to deal with this. We strongly support the concept that when a validity case is bifurcated, every effort is made by the central division to have the oral hearing at approximately the same time as the infringement hearing, bearing in mind that the case will have been fully pleaded. We note that under r.28, a date *and an alternative date* is set by the judge-rapporteur for the oral hearing in the infringement action. We suggest that wherever possible the central division should adopt for its oral hearing one of these dates (in consultation with the parties and the local / regional division). We therefore suggest that r.40(b) is reinstated and that r.38(d) is modified as suggested above, or to

add wording such as "... which shall be as nearly at the same time as the oral hearing of the infringement action as is practically possible".

We note that no guidance is set out in r.37.1 as to when it is appropriate to bifurcate. We appreciate that the Court of Appeal will, in due course, give guidance. However, no Court in Europe currently has experience of the circumstances in which it is appropriate to exercise a discretion to bifurcate, so guidance would be helpful. Further, cases may well settle as a result of a decision to bifurcate (because of the commercial pressure which may thereby be applied) and before the Court of Appeal can consider the point. Therefore, we believe that justice and harmonisation (and hence the avoidance of forum shopping) are both best achieved by clarity at the outset. Hence we suggest the following criteria are added by an addition to the rule as follows:

In considering its decision under Article 33(3), the panel should have regard to at least the following factors:

- (a) whether referring the counterclaim for revocation for decision to the central division is likely to result in an undesirable mismatch between the timing of hearings and determinations in the infringement and revocation proceedings;
- (b) whether referring the counterclaim for revocation to the central division will involve duplicative consideration of evidence or issues, or other unnecessary or increased costs;
- (c) whether amendments to the patent are likely to be sought (in which case infringement and validity should normally be considered together);
- (d) whether the patent is technically complex, such that the presence of a technical judge on the panel would be beneficial in relation to both infringement and validity issues and the issues should therefore be heard together;
- (e) whether it appears to the Court that the Defendant has pleaded that there is a "squeeze" between validity and infringement;
- (f) whether hearing infringement and validity separately would cause the two parts of the case to be heard in different languages;
- (g) whether the parties have agreed their preferred approach as to how the case should be managed under Article 33(3).

Grant of an injunction under r. 118

We believe that r.118.2 should be recast so that there is a presumption of an injunction unless certain factors are present, rather than starting with the phrase "In appropriate cases". While we understand that "innocence" might, under certain conditions, affect monetary compensation for the

period until the time the defendant is aware of the claim of infringement, we disagree that unintentional infringement should be a factor in deciding whether to grant an injunction. If unintentional infringement is to be an issue, then the list of three factors and the use of the word “and” in the penultimate line will mean that injunctions would only not be granted if there is unintentional infringement, which would be too pro patentee. We also suggest another circumstance where an injunction should not be granted, namely where if a patentee has requested bifurcation, and this has been granted against the wishes of the defendant, until the date of the validity decision (and that this shall be mandatory until the central division has yet to make its decision on validity). (This is, of course, due to the possible issue of the “injunction gap”.)

We therefore suggest that the rule is re-drafted as:

2. Whilst the usual remedy for infringement of patent shall include the grant of an injunction, at the request of the party subject to the injunction and/or liable to the other orders and measures provided for in paragraph 1 the Court may order damages and/or compensation to be paid to the injured party instead of applying the orders and measures if:

- (a) the patent proprietor has requested and been granted bifurcation against the wishes of the defendant, and shall not grant an injunction for so long as the final decision of the central division of Court of first instance has not been rendered; or
- (b) execution of the orders and measures in question would cause such party disproportionate harm, and damages and/or compensation to the injured party are an adequate remedy and are capable of being paid by the defendant.

Protective letters and ex parte injunctions

We do not support the protective letter system. Instead we believe that the hurdle to grant any ex parte relief should be very high indeed and such as to exclude all cases save counterfeiting and piracy type cases (which in patent matters is, of course, extremely rare) and cases involving likely dishonesty. If a matter is very urgent, there is no reason why, at a minimum, notice should not be given by the applicant party to the other side by electronic means or by telephone, or in default of that by the Court so that representations can be given (if necessary by telephone) rather than making orders which may have catastrophic effects on defendants without any notice.

Rule 192(2)(b). We question whether specifying the “exact location” is too restrictive. Although in many cases this may be appropriate (for example, Rule 196(2) when an ex parte order is granted allowing seizure of materials), there may be cases where a more general description is appropriate – for example, an order to preserve evidence relating to a manufacturing process wherever that evidence might be.

The words “unless they are referred to in open court” should be added at the end. We also suggest that consideration should be given to adding a more general Rule to the effect that documents and other materials produced under obligations of the Rules or orders of the Court cannot be used for other proceedings until they are referred to in open court.

Rule 197(1). We are concerned to ensure that *ex parte* orders not be made unnecessarily. It is important that Rule 197(1) should be changed so as to read: “The Court may only in exceptional circumstances order measures to preserve evidence (Rule 196.1) without the defendant having been heard, including but not limited to in particular where any delay or notice to the other party is likely to cause irreparable harm to the applicant or where there is a demonstrable risk of evidence being destroyed or otherwise ceasing to be available.”

It is also important that the protections contained in Rule 206(3)(b) and Rule 206(4) should apply to *ex parte* orders to preserve evidence and orders for inspection.

Security for provisional orders

It is noted that r.211.4 provides a discretion for security to be given in order that provisional measures are ordered. We believe that it should be mandatory to offer a cross-undertaking in damages, and that the Court should exercise its discretion in the light of factors specifically including the ability of the party to pay, and whether it has assets in the EU. In r.211.4, is the word “revokes” correct? The measures might be modified in a significant way. We suggest there is no need to do more than give the Court power to make an award in the defendant’s favour.

Opt outs

We believe that there should be no fee to opt out of the system, since patentees did not “sign up” to the UPC and should be entitled to divorce themselves from it without cost. At a practical level, the absence of a fee would also prevent there being any issues connected with failure to pay fees promptly. The absence of a fee would allow applications to proceed directly to the Register.

If there is to be a fee, it should be a purely low-level administrative fee, and not a fee designed either to fund the UPC, or a policy tool to discourage opt outs.

If the current proposal of rule 5.9 is to be followed, we note that technically 5.9 would only come into effect after the agreement came into effect, and hence too late, such that it would therefore be entirely redundant. Instead of Court rules, a mirror provision would be required in the EPO rules and some rules required in the Registry rules concerning data transfer. In any case we have a concern that rule 5.9 may be *ultra vires* as the Rules have no power to bind the EPO since the EPO will not be signatory to the Agreement.

We suggest a rule requiring the Registry to register applications for opt outs on to the Register within 21 days of application regardless of the payment of the fee, but with the power to remove again if the fee has not been properly paid, and after the patentee has been given a chance to remedy the defect, and a provision preventing any revocation actions being commenced until 28 days after the start date of the UPC. This would be a one-off arrangement so as to allow registration directly with the Registry of the opt out and avoiding problems of failure to register an opt out which has been applied for but a revocation claim started first. We see no reason why such a short delay in the ability to start revocation proceedings would prejudice any person unduly, nor be contrary to the UPC agreement: it would be a simple administrative measure.

We disagree with the Rules Committee that the opt out provisions of Article 83 are clear. We note that different proprietors may own different designations of a European patent and that Article 83(3) is not crystal clear in its effect in relation to such situations. The rule should therefore be entirely clear that such proprietors can act independently as to their choice of opting out. (The wording in r.5.1 could usefully be clarified.) We appreciate that this will mean that in some cases EPs may (in effect) be partly opted out, but partly "opted in" and this causes an issue with regard to the effect of Article 34. However, the alternative is to attempt to force different proprietors to agree something which may be an impossible thing to force them to do. Why create a difficulty, especially as there is no obvious mechanism for resolving such disputes?

We note that the position with opting out SPCs is unclear. Whilst we note r.2.1, we suggest that rule 5 makes clear that:

1. SPCs may be opted out by their proprietors in the same fashion as a European patent, that is that unless there are different proprietor, the opt out applies to all national SPCs flowing from a particular European patent; and
2. If a European patent is opted out, all SPCs flowing from that European patent are likewise opted out automatically by way of continuation of the opt out, and if any fee is payable in respect of opting out a European patent, no additional fee is payable for the continuation of the opt out of the subsequent SPCs.

Timings

We are concerned that it is ambitious to bring actions to trial within one year when such an extended period is permitted for the written phase. This will be especially problematic where extensive translations are required. Whilst prefaced with the words "Without prejudice to the principle of proportionality" we note the mandatory nature of the time period in r.101.3 stating that the judge-rapporteur "shall" complete the interim procedure within three months of the closure of the written procedure. This is unrealistically short. At most, the judge-rapporteur should be required to aim to

complete the interim procedure within three months. We suggest that the judge-rapporteur “shall endeavour to complete the interim procedure within three months or such longer period as shall be appropriate based upon proportionality and the complexity of the case”.

We are likewise concerned that r.113 includes a presumption of a one day oral hearing. There is no need to fetter judicial flexibility, and clearly the length of an oral hearing may depend on numerous factors including whether only infringement is in issue, or both infringement and validity; the number of patents in suit; the number of parties (especially defendants); and the complexity of the technology. Moreover, having regard to our comments below on fees, there should be no concern that longer cases will be a drain on the resources of the Court.

Fees

It is understood that Court fees will not be set by the Rules Committee. Nonetheless, we have five observations on the structure provided by the Rules.

First, whilst appreciating that the Agreement mandates a value based fee element, the Rules Committee appears to enshrine a German approach to value. This is a regime which many users (including German users) deplore. It means that litigating very valuable rights is extremely expensive, especially in cases of multiple parties. Also, determination of value is contentious. We consider that a different value element should be adopted and propose that the value element is related to the use of Court time by the dispute. Hence, we believe that a mix of fixed and varying fees would be appropriate. There could be first a fixed fee for issuing proceedings, and taking other stages in the action as are required (such as the interim conference); and second a flexible fee for any witness hearing and depending on the duration of the oral hearing (possibly including an assessment of the time in pre-reading which should be closely related to the duration of the oral hearing). Since more valuable cases will inevitably occupy more of the Court's time and other resources, this is an entirely appropriate mechanism to ascribe value to the case and is less contentious than a German-style value based assessment. At its simplest, the value-based approach we suggest could be a fee of €x per unit of Court time involved, probably a day or half day of court time. Such a fee, if set at a high unit level such as €50,000 per court day, could then realistically cover court costs and act as a deterrent to parties unnecessarily seeking long hearings.

Second, we note that r.25.1 mandates that if invalidity is plead as a defence, a revocation counterclaim shall be filed, and that r.26 provides for a fee then to be payable. This equates to a requirement to pay a Court fee to defend oneself. This is objectionable, and r.26 should be deleted.

Third, we note that recovery of attorneys' fees under r.152.2 is to be related to the value of the dispute. We see no reason for this rule. Fees should be related to the work done in term of hours, and the only ceiling we

suggest is a recovery rate of fees per hour, and/or an absolute cap, which might again be related to the complexity of the case as defined by the length of the oral hearing.

Fourthly, to ensure overall fees remain within reasonable levels, actions involving multiple patents should not attract multiple fees, but count as a single case for calculating fees, to avoid escalating costs especially in fields where multiple patents are commonly in suit.

Fifth, it should be clarified from the outset whether court fees are part of recoverable costs. This becomes very significant (particularly for SMEs) if fees may be significant.

Separately, we also note that the interim conference is a very late stage at which to decide an issue of value, which impacts on fees (r.104(i)). Will this require evidence to be submitted by the parties? Will the value stated affect the damages claim, and especially the value-based fee under r.133?

Languages

Under the UPC Agreement, a single language of the case is required, but a great deal of choice is *de facto* given to the Claimant by virtue of its ability to choose forum. Depending on the local / regional division, this may be a language which may easily cause problems for at least one defendant. In other cases, the Claimant, however, may be constrained by the prescriptive nature of r.14.2 to choose a language which is inconvenient to any or all of the parties. Consequently we believe that r.14.2 should not be prescriptive in the choice of language where a local or regional division operates in more than one language, but that protection should be provided to defendants by enabling them to request that another language of the division should be used as the language of the case, or in appropriate circumstances to request that the case should be transferred to another division in which a more appropriate language may be used.

Cross-examination

It should be required that a party seeking to offer witness evidence must lodge a written witness statement and so "may" in **Rule 175(1)** should be replaced by "shall".

A witness/expert should expressly state that they would be willing to be cross-examined by the court and, where challenged, by the representatives of the counter party, if so ordered by the court.

There needs to be clarification on when the ability to challenge a witness statement referred to in **Rule 177** will arise.

There needs to be the ability for a party to ask for the other side's witness to be heard so they can be cross-examined. If the Court does not make such order, this should be an appealable decision.

Nationality of technical Judges

We note that no provisions are made for ensuring that the multi-national nature of panels is not compromised by the appointment of technical judges. For example it would be unfortunate if, in the London local division, which would be staffed by two English and one non-English judge, a third English technical judge were added to the panel. We suggest that the nationality of technical judges should never be the same as that of any two judges on any panel (first instance or appeal).

Court technical expert

We believe that parties should have right to object to an appointment under r.185.3, and that this should be an appealable decision.

Is the Court appointed expert paid for by the Court out of Court fees or additionally by the parties? (No mention is made of r.185 in r.150.) Why should the parties pay if the Court appoints an expert of its own volition, and especially against the wishes of a party which ultimately has to pay costs?

Admissibility of evidence

We note that r.112.4 refers to “admissible” evidence, but that no definition is provided. Is hearsay to be admitted, or is it to be a question of weight? Under what law will these matters be decided?

Likewise, in r.172, what does “evidence” mean? On its face r.172.1 imposes a wide disclosure obligation, but r.172.2 the power of the Court is limited to requiring a statement of fact. This requires clarification.

Use of evidence obtained in proceedings

Evidence obtained under saisies is often used in other proceedings. This system should not be perpetuated in the UPC, still less when document production may also be compelled. There should be a provision preventing any evidence obtained in UPC proceedings which has been obtained by compulsion from being used for the purposes of any other proceedings.

Rights of audience

In the UK, a number of (about 100) patent attorneys have qualified as patent attorney litigators (PALs) and accordingly have the right to represent clients in the same way as UK Solicitors the High Court. Are PALs to be regarded as “lawyers” for the purposes of Article 48(1) and r.286 or otherwise “grandfathered in”?

Furthermore, a small number of UK patent attorney litigators have gone on to obtain Higher Courts Advocacy Certificates. These Certificates are analogous to the higher rights of audience granted to UK solicitor advocates, and have been issued by the UK Patent Regulation Board since 2013. They give the holders advocacy rights on patent matters before all higher UK courts, including the Supreme Court. It would be incongruous if holders of these Certificates were excluded from Article 48(1).

Miscellaneous issues

We note that there will be a need to check in detail that, where a number of “elements” are listed, it is clear whether the list is conjunctive or disjunctive (or partially both).

R.44.2(b) - we note the reference to exclusive licensees. How does such a licensee become a party, when the action (r.43) is to be brought against the proprietor? Why just an exclusive licensee when there may be nonexclusive licensees also entitled to sue?

R.70 - if there is a revocation action and infringement proceedings are subsequently brought (even if against another party), should the claimant have to inform the Court that there are revocation proceedings in existence?

R.101.1 - why does there need to be a panel mandate for an interim conference?

R.113.2- when are the issues for oral testimony identified? Given that it is up to the judge-rapporteur or the presiding judge it seems not to be at the interim conference (which may be too early for this anyway). Equally, it should be before the oral hearing, rather than at its outset.

R.138 - can/should the defence include any counter-offer (or other statement as to the proper quantum) so that the Court can clearly see the parties’ positions and inform a subsequent decision on costs?

R.177 - can the Court order attendance of witnesses outside its jurisdiction? If so, what sanctions are there for non-compliance and against whom would they be applied?

R.271.4(a) - the reference to serving “or at any place ... where the company ... has a place of business” is surely inappropriate at least in as far as it should not be possible simply to choose *any* place of business. There should, as a minimum be a ranking order of places where service must be effected.

IP Federation
30 September 2013

IP Federation members 2013

The IP Federation represents the views of UK industry in both IPR policy and practice matters within the EU, the UK and internationally. Its membership comprises the innovative and influential companies listed below. Its Council also includes representatives of the CBI, and its meetings are attended by IP specialists from three leading law firms. It is listed on the joint Transparency Register of the European Parliament and the Commission with identity No. 83549331760-12.

AGCO Ltd
Airbus
ARM Ltd
AstraZeneca plc
Babcock International Ltd
BAE Systems plc
BP p.l.c.
British Telecommunications plc
British-American Tobacco Co Ltd
BTG plc
Caterpillar U.K. Ltd
Delphi Corp.
Dyson Technology Ltd
Element Six Ltd
Eli Lilly & Co Ltd
ExxonMobil Chemical Europe Inc.
Ford of Europe
Fujitsu Services Ltd
GE Healthcare
GKN plc
GlaxoSmithKline plc
Hewlett-Packard Ltd
IBM UK Ltd
Infineum UK Ltd
Johnson Matthey PLC
Merck Sharp & Dohme Ltd
Microsoft Limited
Nokia UK Ltd
Pfizer Ltd
Philips Electronics UK Ltd
Pilkington Group Ltd
Procter & Gamble Ltd
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Rolls-Royce plc
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