

**REGISTRY CODE OF CONDUCT**

GNR will at all times operate as a trusted and neutral third party provider of DNS Registry Services. The domain names on .NAME are the means by which individuals and consumers all over the world will access, navigate and otherwise benefit from the global Internet. It is vital for the community that the DNS resources are administered in a fair, efficient and neutral manner, to ensure equal access for all parties in the competitive DNS space. To ensure the neutral operation of the registry services, GNR will follow the following Code of Conduct:

1. Other than in connection with the distribution of dividends or other profits to GNR's members and shareholders, GNR will not, and will require that its subcontractors do not, directly or indirectly, show any preference or provide any special consideration to any DNS registry operator or ICANN-Accredited Registrars in the .name Registry versus any other DNS registry operator or ICANN-Accredited Registrars in the .name Registry, as those terms are defined by ICANN, including the registry or registrar owned by a member of GNR.
2. All ICANN-Accredited Registrars in the .name Registry shall have equal access to Registry Services provided by GNR as set forth in Appendix H.
3. GNR and its members and subcontractors shall not in any way attempt to warehouse or register domain names in their own right, except for names designated for operational purposes in compliance with Subsections 3.6.1 and 3.6.2 of the Registry Agreement. In its Monthly Report to ICANN, GNR shall include a list of all names designated for operational purposes.
4. Any shareholder, subsidiary, affiliate, or other related entity of GNR that also operates as a provider of registrar services shall maintain separate books of account with respect to its registrar operations separate from those of GNR.
5. Neither GNR, nor its shareholders, subsidiaries, affiliates, or other related entities shall have access to user data or proprietary information of an ICANN-Accredited Registrar, except as necessary for registry management and operations.
6. GNR will ensure that no user data or proprietary information from any ICANN-Accredited Registrar is disclosed to its affiliates, subsidiaries, or other related entities, except as necessary for registry management and operations.
7. Confidential information about GNR's business services will not be shared with employees of any DNS registry operator or ICANN-Accredited Registrars, except as necessary for registry management and operations.
8. No member of GNR's Board of Directors will simultaneously serve on the Board of Directors of an ICANN-Accredited Registrar that obtains Registry Services from GNR.

9. No employee of GNR will hold a greater than 5% interest, financial or otherwise in a company that obtains Registry Services from GNR.
10. No employee of GNR will also be an employee of any GNR subsidiary, affiliate or other related entity that also operates as an ICANN-Accredited Registrar.
11. GNR will ensure that no user data from or proprietary information of any registry operated or controlled by GNR is disclosed to any other registry operated or controlled by GNR.
12. GNR will not attempt to itself determine any entity's right to a particular domain name, and has no means by which to verify such rights.

GNR will conduct internal neutrality reviews on a regular basis. In addition, GNR and ICANN may mutually agree on an independent party ("Neutrality Analyst") that ICANN may hire, at ICANN's expense, to conduct a neutrality review of GNR, ensuring that GNR Any shareholder, subsidiary, affiliate, or other related entity of GNR that also operates as a provider of registrar services comply with all the provisions of this Registry Operator Code of Conduct. The neutrality review may be conducted as often as once per year. GNR will provide the Neutrality Analyst with reasonable access to information and records appropriate to complete the review. The results of the review of the Neutrality Analyst will be provided to ICANN and shall be deemed to be confidential and proprietary information of GNR and its owners.