

Anti-Corruption Policy

Policy Statement

This policy outlines the minimum requirements of the Green Plains Inc. (together with its subsidiaries and affiliates, the “**Company**” or “**Green Plains**”) Anti-Corruption Program Policy, which establishes and maintains a comprehensive Anti-Corruption Program (“**the Program**”) that: 1) sets out the Company's zero- tolerance policy on bribery and corruption; and 2) promotes compliance with applicable regulatory requirements on bribery and corruption.

Purpose

To maintain robust and effective anti-corruption controls that:

- Facilitate conducting business with the highest ethical standards and prohibit all forms of bribery and corruption;
- Underlie a comprehensive Program to identify, manage, and mitigate corruption risks associated with the Company's business activities; and
- Avoid any violations of relevant laws and regulations, including, among others, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010.

Scope

This policy applies to all employees of the Company, its subsidiaries and those affiliates over which it has operating control, officers, directors, and any third parties acting on the Company's behalf.

Definitions

Definitions of terms relevant to this policy:

Anything of Value: A term interpreted broadly by U.S. authorities including, but not limited to, cash or cash equivalents, entertainment, meals, travel, gifts, political or charitable contributions, reimbursement or expenses, personal favors, forgiveness of debt, offers of employment, tax advantages, and educational placement.

Bribe: A payment or promise to give money, fee, commission, credit, gift, gratuity or anything of value to a person in a position of influence for purposes of improperly persuading the person.

Business Courtesies: Any Gift or form of Business Entertainment.



Green Plains Inc.
1811 Aksarben Drive
Omaha, NE 68106
Phone: 402.884.8700
Fax: 402.884.8776
gpreinc.com

Business Entertainment: Business Entertainment includes any social event, hospitality event, ticketed event, charitable event, meal, leisure activity, conference, training, marketing event, or similar event attended by one or more employees (if an employee is not in attendance, then the entertainment should be considered a gift).

Charitable Donations: A monetary gift or payment in-kind made by an individual or an organization to a nonprofit organization, charity or private foundation. For example, donations that are made to registered organizations with 501(c)(3) status by the U.S. Internal Revenue Service are Charitable Donations

Corruption: Dishonest or fraudulent conduct, typically involving bribery.

Facilitation Payments: A Payment to a FGO (as defined below) to expedite or facilitate a routine governmental action or service such as obtaining a license or business permit, processing government papers such as visas, customs clearance, or providing telephone, power or water service, among others. Facilitation Payments are allowed only in certain countries. Therefore, the Company generally prohibits Facilitation Payments, except for very limited circumstances that require the prior written approval of the Chief Legal and Administrative Officer and only if the Facilitation Payment otherwise complies with the terms contained in this policy.

Foreign Government Official (“FGO”): A political party candidate or any person acting on behalf of an international (non-US) government or agency, department, non-U.S. political party, instrumentality or other entity of such government (e.g., national, state or local governmental bodies). Also included are any employees of businesses or entities owned (in whole or in part), controlled or operated by a government agency. This term shall also mean any person who is employed by a Public International Organization, including but is not limited to, organizations such as the United Nations and World Bank.

Examples of FGOs include, but are not limited to, any of the following: police officer, safety/environmental/health inspector, customs/immigration official, licensing or registration official, immigration agent, cabinet member, ministry official, or an employee of a public utility.

Gifts: Gifts include receiving or offering anything of value which can include merchandise, discounts on services, loans, stocks, and compensation, among others (nominal value items are not included). Gifts can be of nominal or minimal value (e.g., calendars, hats, t-shirts, mugs and other promotional items).

Political Donations: A contribution made to a politician or a political campaign, a political party or political action committee that can come in any form, including:

- Monetary items;
- Non-monetary items (such as loaned or donated equipment, free technology services, or a donation of an employee's time); and

- Use of corporate resources (such as facilities, email, stationery, personal time).

Third-Party: Any agent, representative, consultant, contractor, distributor, joint venture partner, bank issuing letters of credit or other third party which may act on the Company's behalf with FGOs or international government entities, or an international trading partner the Company has transacted or may contract with.

Roles and Responsibilities

Effective internal controls and compliant practices to prevent and detect corruption and bribery require the following to maintain and support the Program:

- Green Plains Chief Legal and Administrative Officer must approve the Program.
- A designated individual or working group to oversee the Program and related controls.
- Managers, supervisors and their assigned qualified delegates must institute measures to facilitate the understanding of and compliance with Program requirements by employees they supervise.

Employees are responsible for ensuring compliance with the policy and Program requirements including promptly reporting suspected or actual corrupt activities and timely completion of any required anti-corruption training to remain informed and current on the Program's requirements. The Program is supported by the following internal Company policies and procedures:

- FCPA and SDN Policy;
- Sponsorship Guidelines and Criteria;
- Political Action Committee Policy; and
- Employee Handbook.
- Gifts and Entertainment section;
- Political Activities and Public Relations section; and
- Conflicts of Interest section.

Minimum Requirements

The Program consists of the following controls and measures for preventing, detecting, and managing corruption and bribery:

Zero-Tolerance Policy – the strict prohibition against giving or receiving bribes

Tone at the Top – ongoing commitment from the board and senior management for the Program including the provision of sufficient resources and issuance of periodic notices and communications on the Program.

Policy – this policy, which articulates the company's zero-tolerance policy on bribery and corruption and encompasses requirements of relevant anti-corruption and bribery laws.

Identification of Specific Risk Areas – special considerations regarding the following areas that may present a heightened risk of corruption activities:

- Business Courtesies – Business Courtesies may be given or received only in accordance with the Gifts and Entertainment section of the Company's Employee Handbook, which includes the following restrictions:
 - No Business Courtesies may be given or received that improperly influence anyone, particularly a FGO, in exchange for any improper favor or benefit or even create a perception of impropriety.
 - No gifts of cash or cash equivalents, such as gift cards, are permissible.
 - Business Courtesies must be infrequent, modest, and reasonable in an amount that:
 - conform to the applicable law, local custom and business practice;
 - do not give the appearance of creating an obligation for the recipient;
 - are reported and documented accurately in the Company's books and records;
 - cannot be construed as a bribe or payoff, or result in embarrassment to the Company in any way; and
 - are not solicited by the recipient.
- Charitable and Political Donations – Donations must be carefully considered, avoiding any inference of trying to obtain an improper advantage and subject to the following:
 - All Political Donations must comply with the Company's Employee Handbook – Political Activities and Public Relations section, as well as the Political Action Committee Policy, which provides requirements and restrictions such as:
 - No donations can be reimbursed by the Company;

- Only eligible employees and shareholders are solicited for PAC donations;
 - All PAC donations are within annual federally-prescribed limits; and
 - All PAC donations over \$100 in a calendar year are publicly disclosed; and
- No company assets, including time at work, use of company premises or equipment, or direct monetary payments, may be contributed without the prior review, and written approval of the employee's supervisor or the Company Legal Department.
 - Charitable Donations must comply with the Company's Employee Handbook – Conflicts of Interest section, as well as section 6.4.1 of the FCPA and SDN Policy, which provides requirements and restrictions.
 - Green Plains will, from time to time, sponsor charitable and local community events. Company sponsorship must follow internal Sponsorship Guidelines and Criteria protocols and be approved by the Sponsorship Committee.
 - Foreign Government Officials – Subject to certain prohibitions and restrictions detailed in the Company's FCPA and SDN Policy, relating to the acceptance of anything of value even if it conforms to business norms and there is no improper intent. Before providing anything of value to government officials remember:
 - It is never permissible to hire or engage a FGO, or his or her immediate family members, to improperly influence the official, or in exchange for any improper favor or benefit.
 - It is never permissible to provide a business courtesy to a FGO, whether directly or through an agent, before obtaining prior approval from the Company's Legal Department.
 - Facilitation Payments – The Company generally prohibits facilitation payments, except for very limited circumstances that require the prior written approval of the Chief Legal and Administration Officer and only if the facilitation payment is:
 - A final resort with no alternatives, and the expected delay will have a significant impact on the business;
 - Made where such payments are customary and not expressly prohibited by law;
 - Not used to gain an unfair business advantage;
 - An amount that is modest given the facts and circumstances of the situation;

- For personal safety (if security or freedom of movement is at risk), a facilitation payment may be made and then reported to the Company; and
- Accurately reported and documented in the Company's books and records.

Third Parties – Special care must be exercised around third parties that assist or work with the Company including engaging them in accordance with the Company's FCPA and SDN Policy, which provides requirements and restrictions such as:

- Careful assessment, evaluation, and selection of third parties before engagement and subject to a contract that includes anti-corruption provisions;
- Third parties cannot be used to perform or engage in activities prohibited by this Policy; and
- Commissions, compensation, reimbursement, and other payments to third parties must be customary and reasonable and accurately recorded in the Company's books and records.

Implementation – All areas must maintain procedures and other controls to demonstrate the implementation of Program requirements.

Integration – Program requirements integrated into the Company's controls.

Reporting – Any suspected or actual instance of bribery or corruption must be reported immediately to your manager, the Company's Legal Department, or via the Company's EthicsPoint hotline (<https://gpreinc.ethicspoint.com> or 844.957.2596). Any systemic or high-risk matters will be reported to senior management or the board audit committee for further consideration.

Training – Delivery of periodic general and specialized training and communications to existing and new employees and, as needed, third parties on the Program.

Books and Records – Keeping detailed and accurate financial records based on appropriate internal controls that accurately and completely reflect the Company's transactions, assets, financial position, and appropriate approvals.

Monitoring and Testing – Periodic monitoring and testing of the Program to advise on the compliance and effectiveness of the Program processes and controls.

Maintenance – Periodic review of the Program against the results of internal and external reviews as well as regulatory rule changes, among other considerations, to confirm adequate and current controls are in place, and where necessary updated as needed.

Retention – Retention of required records related to the Program in accordance with Company recordkeeping requirements.