



Global Code of Business Ethics and Integrity

Introduction

The following SynTech Research Global Code of Business Ethics and Integrity has been approved by the Board of Directors and the Global Executive Committee. It is a critical component of realizing our vision for SynTech Research Group. Following the Code ensures that we act appropriately in all activities associated with the Company, including those not governed by laws or regulations. It is designed to help us in making the right choices, providing clear instructions for appropriate business conduct and decisions which impact our Company, customers, partners and communities. It applies to all SynTech employees, those representing SynTech and those working on our behalf.

Responsibilities

SynTech Research employees have a responsibility to act with integrity, and to comply with the laws in the locations where we work. Supervisors are expected to set an example of proper business conduct, reinforce our values as part of their actions and communication with employees, and maintain a work environment where employees understand what is expected of them and can share concerns or report misconduct.

Integrity of Services

All our services and activities must be provided in a professional, independent and impartial manner, honestly and in full compliance with Group approved methods, practices and policies.

- Comply with the Company processes and procedures, and all relevant laws and regulations.
- Comply with environmental laws and requirements wherever we operate. For example, improper disposal of chemicals and seeds/traits can have a devastating impact on the environment, as well as the immediate health and safety of employees and others.
- All employees of SynTech Research and its affiliates or contractors must perform all GEP and GLP studies in accordance with approved protocols, and studies must be performed under Company standard controls, management review and/or Quality Assurance.
- Data must be accurately recorded, reproducible, fully documented, and with appropriate statistical analysis. Employees working with regulated chemicals or

Seeds/Traits (GMO) must be trained to ensure use of procedures, protocols and systems compliant with regulatory requirements.

- All Seeds/Traits (GMO) testing services must be conducting according to the Bio-safety compliances of the local requirements.

Fair Competition

We recognize the benefits of a free-market economy and of competition as the optimal way to allocate resources, but we accept that we have to compete fairly within the framework of the applicable competition laws.

- All contracts must be fairly negotiated.
- Selection of suppliers and subcontractors who provide products or services, must be merit-based, following assessing quality, safety records, technical ability, previous experience, reliability, cost, time to delivery and, availability.
- Anti-competitive actions such as price fixing, bid rigging, allocating customers, markets or territories with a competitor, or colluding with others to refuse to deal with a customer is prohibited. If an employee or competitor attempts to discuss any of these anticompetitive practices with you, voice your disapproval, stop the conversation and immediately report it to your Supervisor.

Communications

Employees must not speak on SynTech Research's behalf unless they have been specifically authorized to do so. Do not make false or misleading statements about the quality and availability of our, or our competitors', services and do not make unfair or untrue comparisons between our competitors' services and our own. Do not use social media or any other communication means to disparage customers, suppliers, employees, or make misleading or unsupported statements about SynTech Research. Do nothing to give the impression that personal views and opinions expressed are also those of our Company.

Conflict of Interest

A conflict of interest is any situation where the interests of SynTech Research diverge from your own personal interests or those of your close relatives or of persons with whom you are in close personal or business contact. These situations must be avoided because they can influence your judgement, even without your noticing it. Therefore,

- Employees must not accept outside employment that might affect their ability to perform their jobs. This includes simultaneous employment with a competitor, customer, supplier or other SynTech Research business partner.
- Employees should not be involved directly in hiring, or direct management of, immediate family members. This includes spouses, partners, children, stepchildren, parents, step-parents, siblings, in-laws or household members. If Supervisors believe that a conflict of interest arises due to a relationship, they may change the reporting relationship.
- Employees should not conduct any SynTech Research business with a close relative or with an organization with which they or one of their close relatives are associated.
- Employees should not take any interest in a supplier, client or competitor of SynTech Research except for publicly traded securities to an extent which does neither grant significant influence nor create undue dependence and subject to reporting this interest.

- Employees should not accept an office or any employment outside SynTech Research without having obtained clearance.
- Outside investments which employees hold directly, or over which they have control, must not influence their decisions as employees. It is Company policy and a legal requirement that you must not buy or sell the stock of any company while in possession of inside information about that company, or advise others to trade on such information.

Improper Advantages

Improper advantages should never be granted nor accepted, whether directly or indirectly.

- Improper advantages are advantages granted to influence governmental or corporate decisions or actions in violation of duty. They may take the form of bribes, gifts, excessive entertainment or kickbacks. They also include political contributions on behalf of SynTech Research unless they are disclosed, comply with local law and have obtained prior clearance.
- Improper advantages are often granted by agents, intermediaries, consultants or contractors claiming to perform a bona fide service or by joint venture partners or suppliers. We therefore do not deal with these parties if we know or have reasons to believe that they engage in granting improper advantages.
- Gifts, hospitality and entertainment must always be related to a genuine business purpose. They may not be intended or appear to be intended to influence a decision or action and must be kept within what is socially acceptable and legally permissible.
- For charitable contributions or sponsoring of events, prior clearance must be obtained. Employees must not use SynTech Research property, resources or time for personal political activities or charitable causes, unless officially sponsored by SynTech Research. Never use Company information technologies to solicit on behalf of religious or political causes not pre-approved by the Company.

Employee Relations

SynTech Research is committed to providing a safe, healthy and respectful work place and fair working conditions to all its employees.

- Violent or physically aggressive acts, even if intended as a joke, are prohibited.
- Employees and affiliates of SynTech Research are not permitted to consume alcohol or illegal drugs whilst working on assignment for the Company. The use of both controlled and non-controlled substances can impair an individual's ability to perform duties in an otherwise safe work environment.
- Employment-related decisions must be based on merit, not on race, color, religion, gender, age, mental or physical disability, gender identity or expression, marital status, ancestry, medical condition including genetic characteristics, veteran or military status, national origin, or sexual orientation.
- Harassment can be verbal, physical, electronic or visual, sexual or non-sexual. SynTech Research prohibits any form of unwelcome, offensive, demeaning or intimidating behavior toward another person.

Personal, Confidential, Competitively Sensitive and Customer's Information

This applies to all information and correspondence sent through, received by or stored within our Company electronic mail, voicemail accounts, websites or any other means. It includes the information we create, send, receive, process or store on Company technology such as laptops, phones and other systems and devices (see below). Employees involved in collection, editing, communication, processing, storage or use of personal information must comply with all region and country data privacy laws as concerns our business and include internal controls to protect this information.

- **Confidential information** includes information that is not public that can be harmful to SynTech Research if disclosed. Examples are financial or technical information, pricing data and customer lists.
- **Competitively sensitive information** includes information about our competitive activities that we would not want to be seen by our competitors or others who could use it to harm or disadvantage us. This includes trade secrets and other information about our intellectual property, and information that we do not make public about our financials, employees, research, plans, designs, strategies, services, processes, challenges and opportunities, and legal matters. If you obtain sensitive information from a competitor that the competitor would not want disclosed, do not use or distribute it.

Take care to protect customers' information - whether confidential, personal or sensitive. Do not share such information with those who do not have an authorized business need to know it.

Information Technology

Use Company security measures and procedures to safeguard laptops, computing systems and other mobile devices. Information and systems must be managed and protected against unauthorized access, use, disclosure, modification, destruction or denial of services. Your password is personal and belongs to the company do not share it with anyone. Company technology should not be used to browse inappropriate or unapproved websites and web-based services. The Company may monitor and review usage.

Integrity of Financial and Company Records

All transactions must be properly and accurately recorded and all book entries supported by proper documentation issued by bona fide parties.

All records must be retained in accordance with applicable laws and SynTech Research Group's policies.

Follow Company accounting requirements and internal controls when recording information, and submit appropriate documents when required. Follow legal or tax authority requirements, not altering or destroying documents before retention periods have expired. Effective record management helps us to meet our business needs and to obtain relevant documents.

Comply with internal or external audits or investigation of records, by providing the information required. Never try to delay or impede any investigation by altering, hiding or destroying documents.

Reporting

Any report or request for clearance or advice under the Code should be addressed to the CEO and/or the Chairman of the Board.

You should also report any suspected violation of the Code as well as any solicitation from a third party or offer by a third party to you of an improper advantage, to the CEO and/or the Chairman of the Board or to any other member of management with the request to inform the CEO and the Chairman of the Board.

- If you discover unsafe practices, hazardous situations or actions that may affect safety, report the situation immediately to your Supervisor.
- If you or someone you know has received a threat, or been the victim of violence or harassment report the situation immediately.

Unless you have violated the Code or are acting maliciously or in bad faith, and to the extent that we are able to, we will protect you against any form of reprisal and will keep your identity confidential at your request.