Syngenta Group



Syngenta Group Code of Conduct

Our commitment to act ethically and responsibly in business and in the workplace

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Introduction

Syngenta Group Code of Conduct

We are committed to act ethically and responsibly in business, in the environment, socially and in the workplace. The Code of Conduct sets out the standards by which we operate and guides our behaviors and the standards which we expect from suppliers and partners. The Code of Conduct applies to Syngenta Group and the companies wholly-owned or controlled by Syngenta Group. Other Syngenta Group companies are encouraged to follow the Code of Conduct and the policies.

Managers' responsibilities

All Syngenta Group managers and the managers of its companies ("Syngenta Managers") must lead by example and deal with external stakeholders and lead their teams according to the Code of Conduct.

Syngenta Managers must ensure that Syngenta Employees, temporary staff and employees of contractors have read, understood and are applying the Code of Conduct in their everyday activities. They do that by holding regular ethics shares, providing training, and being available to provide support. Managers should also ensure that contractors and temporary workers, especially those working on our sites or engaging with our employees, are operating in line with Syngenta's ethical and safety expectations.



Syngenta Managers must create a safe environment for Syngenta employees to speak-up. If they see or receive a concern about a potential Code of Conduct violation, they must immediately report it to a Compliance Officer.

Employees' responsibilities

All Syngenta Group employees and employees of its companies ("Syngenta Employees") must read, understand and apply the Code of Conduct, wherever they work.

Syngenta Employees are expected to speak-up when they have questions about how to apply the Code of Conduct in their work or if they see or have a concern about a Code of Conduction violation. Syngenta Employees can speak with their managers, or with members of the Compliance, Legal or the Human Resources teams. There will be no retaliation for speaking-up.



Law

As an industry leader, we take our responsibilities very seriously. We are transparent and responsible and comply with all applicable laws, and ensure that employees are aware of those laws relevant to their roles.

We fully support national and international legislation aimed at creating free and fair global trade.



1 Compliance with law
2 Competition law
3 Bribery and corruption
4 Securities trading (Insider dealing)
5 Health, Safety and Environment

Law

1 Compliance with law

Syngenta Group complies with all applicable laws, national and international codes and conventions.

We comply with all national and international laws and industry codes of practice that are applicable to our work.

We are aware that certain laws apply not only to commercial behaviors in a particular country or territory, but also to conduct elsewhere, which has a significant impact on competition in that country or territory.

2 Competition law

Syngenta Group expects its employees to comply with competition law.

We ensure that all business practices fully comply with the competition law wherever business is conducted.

Competition laws apply to business conduct in general and to all business arrangements, irrespective of whether they are in written, oral or any other form.

Competition laws do not normally apply to business transactions solely between Syngenta Group companies.

3
Bribery and corruption

All Syngenta Group dealings with public officials or other third parties must be carried out with integrity and must comply with applicable national laws and international conventions.

We do not provide or offer directly, or through third parties, any unlawful payment, inducement or item of value, to any public official, supplier or anyone else for the purpose of unduly influencing official action or with the purpose of obtaining a favorable decision.

4
Securities trading (Insider dealing)

Syngenta Group prohibits securities trading based on material non-public information.

Syngenta Employees must not use material non-public information for personal gain or for the personal gain of anybody else.

We will not disclose material nonpublic information to anyone, including friends, family, customers or suppliers. In the event of an employee obtaining material non-public information, that Syngenta Employee is prohibited to trade on, or otherwise profit from, such information.

Law

5
Health, Safety and Environment

Syngenta Group applies high standards in Health, Safety and Environmental (HSE).

We aim to protect the environment and to ensure the health and safety of our employees and

others potentially affected by our activities. All operations and facilities must have in place adequate HSE procedures and practices.

We provide a safe and healthy work environment for all Syngenta Employees and work with Syngenta Employees to develop a culture which encourages every employee to take personal responsibility for HSE. Each Syngenta Employee has a duty to follow all HSE rules in place at their workplace.

We ensure HSE considerations are integrated into all activities and Syngenta Employees are given the appropriate training and other support to achieve this.

We openly communicate HSE performance and enter into dialogue with interested parties.



Business integrity

We always maintain the highest standards of fairness, honesty and integrity. This earns us the trust of our stakeholders and protects our reputation.

Through this, we can take great pride in how we conduct our business and our contribution to society, and all Syngenta Employees should apply these standards.



6 Advertising, sales and marketing practices

7 Offering and accepting gifts, services and entertainment

8 Political contributions

9 Lobbying

10 Operating in conflict regions

11 Animal testing

12 Contractual obligations and standards of documentation

13 Conflicts of interest

Business integrity

6
Advertising, sales and marketing practices

Syngenta Group conducts its advertising, sales and marketing activities ethically and in compliance with all applicable laws and codes on advertising practices, in particular the Food and Agriculture Organization of the United Nations' International Code of Conduct on the Distribution & Use of Pesticides.

We present Syngenta Group and its companies and the quality and performance of our products and services with honesty. Comparisons with competitive products, where legally permitted, will be based entirely on factual information.

7
Offering and accepting gifts, services and entertainment

Syngenta Group approves of gifts, services and entertainment solely as proper and legal business courtesies.

We only provide gifts, entertainment or unpaid services when consistent with customary practices and in line with applicable law.

Syngenta Employees only accept gifts, entertainment or personal favors which are given consistent with customary practices and, which might not unduly influence our business decisions.

We do not use other people to by-pass any of the above.

8
Political contributions

Any political contributions by Syngenta Group and its companies must be approved in advance and in-line with relevant internal guidelines.

We only use Syngenta Group funds for political donations in accordance with applicable national law, and with the prior approval of the relevant Syngenta Group business sustainability department, Country Manager or political campaign committee.

9
Lobbying

Syngenta Group may engage in political debate on subjects that advance the Group's goals and improve the communities where we work and live.

We maintain strict internal control of lobbying activities and conduct them in full compliance with local law, guided by honesty, completeness, respect, accuracy of information and transparency.

Any lobbying activities carried out by appointed external agencies or through our industry associations for Syngenta Group must be guided by these same principles.

Business integrity

10
Operating in conflict regions

Syngenta Group operates in conflict regions only for the benefit of the wider population.

We will assess on a case-by-case basis whether it is in the wider interests of its population

for Syngenta Group to continue to provide products and services to sustain agricultural output and ensure adequate food supplies.

We do not violate sanctions and embargoes imposed by the UN.

11
Animal testing

Syngenta Group uses animal studies only when appropriate and aims to develop alternative techniques that replace and reduce the use of animals.

We adopt a humane and compassionate approach to the care and use of animals and aim to operate to the highest professional standards.

Syngenta Employees always consider alternative methods in procedures requiring the use of animals, wherever and whenever appropriate.

12 Contractual obligations and standards of documentation

Syngenta Group honors its contractual obligations and ensures that transactions are timely and accurately documented in conformity with legal requirements and applicable accounting standards.

Syngenta Employees will not commit Syngenta Group to contractual obligations which are beyond the scope of an employee's internal authority.

We make sure that all company reports, records and accounts are prepared and properly stored inaccordance with applicable laws and the relevant standards adopted by the company.

13 Conflicts of interest

Business transactions must be conducted with the best interests of Syngenta Group in mind.

Syngenta Employees do not exploit any business opportunity that conflicts with the interests of

Syngenta Group. They do not undertake any outside employment, business activity or investment which would interfere with their ability to perform their responsibilities for Syngenta Group.

We do not allow any individual or organization to benefit improperly from Syngenta Group through its relationship with a Syngenta Employee. Equally, no Syngenta Employee may personally benefit in an improper way from a relationship with another individual or organization.



Society

We strive to make a positive contribution to society and listen and respond to people's concerns.

As an industry leader, we can be proud of the way we treat our company, our colleagues and society.



14 Environmental impact
15 Biological diversity
16 Communities
17 Stakeholder communications

Society

14 Environmental impact

Syngenta Group evaluates and responds to environmental issues.

We take all reasonable steps to preserve the quality and quantity of natural resources, including water, land and air, through responsible scientific, environmental, agricultural, economic, social and commercial practices.

We aim to minimize the environmental impact of our operations by complying with all applicable laws, international guidelines and industry standards.

We actively support the efforts of our customers and other partners in the safe and environmentally sound handling of the products they receive from us.

15 Biological diversity

Syngenta Group is aware that its business relies on the rich variety of plants and animals known as biodiversity.

We aim to develop new products as well as new methods to use existing products, which protect and enhance biodiversity.

We endorse the principles of conservation and sustainable use of biological diversity and the fair and equitable sharing of benefits arising from genetic resources set out in the Convention on Biological Diversity ("Biodiversity Convention"), adopted in Rio de Janeiro at the Earth Summit in 1992, and the Cartagena Protocol.

Syngenta Employees will not become involved in any acts of bio-piracy or illegal bio-sourcing.

16
Communities

Syngenta Group is committed to making a positive contribution to the communities in which it operates.

Wherever we operate, we seek to make a positive contribution, creating economic, health and social benefits for the community, respecting local customs and traditions, and are ready to listen and respond to people's concerns.

17
Stakeholder communications

Syngenta Group seeks to build trust and understanding with key stakeholders, including investors, media, regulators, governments and non-governmental organizations.

We are committed to an open dialogue and information sharing with our key stakeholders, in line with our company values, and respect the independence of governments and the media.

Syngenta Employees will only engage in dialogue with investors and the media with the prior consent of the appropriate internal function.



Science, products and property rights

We provide innovative, reliable, high-quality products and have safeguards to protect stakeholders and the environment.

The creativity of our people provides products which help growers meet the global challenges to agriculture.



18 Research and Development

19 Product safety, quality and stewardship

20 Asset protection

21 Intellectual property rights

Science, products and property rights

18 Research and Development

Syngenta Group conducts research aimed at developing innovative, safe and reliable products that improve agricultural productivity and increase quality of life.

We publicly disclose research and development results of significance in an objective and accurate way.

We investigate all credible reports of previously unknown short and longterm effects associated with the correct use of our products and take appropriate actions.

We only collaborate on scientific research and development with organizations which apply similar ethical standards.

We strive for sustainability in all research and development operations and aim to protect and conserve natural resources.

Syngenta Employees apply the highest ethical and scientific standards and adopt robust processes and controls. They will be alert to wider societal concerns about technology and its impacts, as well as applying rigorous scientific risk assessment.

19
Product safety, quality and stewardship

Syngenta Group ensures the quality and safety of its products and services by applying state-of-the-art science and technology standards throughout a product life-cycle and ensuring adequate training for our employees and customers.

We work closely with customers, contractors, users and all other stakeholders to ensure proper and responsible use of our products and understanding of the precautions that apply throughout the product life-cycle.

We carefully identify hazards, assess risks associated with the use and alert users of consequences from misuse of a product on the product package, leaflet and label. Products carry clear end-user instructions concerning safe storage, use and disposal.

Syngenta Employees establish robust testing and processes to ensure all internal standards and legislative and regulatory requirements are met or exceeded and will report to company management any failures in meeting our standards or misuse of our products.

Science, products and property rights

20 Asset protection

Syngenta Group respects the property rights of others and vigorously defends its own property rights.

We protect all Company assets, property and resources securely and will only apply and use them for the purpose of the Company's business and activities and not for our own personal gain.

We keep confidential and protect trade secrets belonging to Syngenta Group or other companies and not make any non-business use of them.

Information generated within Syngenta Group, including information relating to research and development, manufacturing data, costs, prices, sales, profits, markets, customers and methods of doing business is the property of Syngenta Group and will not, unless legally required, be disclosed outside Syngenta Group without proper authority.

21 Intellectual property rights

Syngenta Group considers effective Intellectual Property (IP) protection essential to encourage innovation. To be effective, any IP system must maintain the right balance between the needs of society and the interests of the inventor.

We protect and assert our IP rights rigorously and will respect the IP rights of others in accordance with local laws.





People

Our employees play a fundamental role in our performance as a business.

We ensure our diversity policies provide fair treatment for all employees and we aim for the highest, internationally acknowledged benchmarks of fairness, honesty and integrity.



22 Labor rights

23 Discrimination and harassment

24 Diversity

People

22 Labor rights

Syngenta Group complies with all labor laws, national and international codes and conventions and is committed to upholding the principles set out in the Universal Declaration of Human Rights and the International Labor Organization's core conventions.

We recognize Syngenta Employees' rights to become members of relevant labor unions and/or other employee organizations and bargain collectively. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

We do not use forced, bonded or compulsory labor and refrain from any form of exploitative child labor practices.

23 Discrimination and harassment

Syngenta Group is committed to maintaining a workplace environment free from discrimination and harassment. Success and advancement within Syngenta Group must depend on personal ability and work performance.

We do not tolerate discrimination based on race, sex, religion, creed, national origin, disability, age, sexual orientation, physical or mental disability, family status, political views or any other characteristics protected by law.

We prohibit harassment in any form, including verbal, sexual, physical, mental and visual harassment, abuse, humiliation or intimidation.

Every employee must respect the rights of colleagues to work free from any form of discrimination or harassment in the workplace.

24
Diversity

Syngenta Group values diversity and fosters a culture that allows each individual to contribute to their fullest potential.

We actively recruit employees to reflect the broad range of cultures, beliefs and backgrounds of the communities where we operate and the customers we serve.

We treat every employee with honesty, dignity, fairness and respect.

We make decisions about people for the purpose of recruitment, development or promotion purely on the basis of their performance, ability and potential in relation to the requirements of the job.

We encourage any employee who believes they have suffered discrimination or harassment to report it to their managers, or through the Syngenta Group Compliance Helpline. We will investigate every report impartially and follow-up proven violations with appropriate measures.

Compliance with the Code of Conduct





Adherence to the Code of Conduct

Every Syngenta Employee is required to read and understand this Code of Conduct and will be asked to confirm this annually in their Code of Conduct commitment letter. Syngenta Group requires that all persons governed by this Code of Conduct understand and fully comply with these provisions. Each Syngenta Employee must abide by the Syngenta Group Code of Conduct and all policies, guidelines and rules adopted by Syngenta Group.



Speaking-up when you see violations of the Code of Conduct

It is the duty of every Syngenta Employee to speak-up immediately if they know or believe that anyone is not complying with the Code of Conduct. There is no retaliation for speaking-up.

Employees can speak to their managers or members of the Compliance team at any time. Employees can also use the Syngenta Group Compliance Helpline, or the helplines available in their companies for confidential reporting. The helplines are operated by third party organizations with specialist counselors, and is available 24 hours a day, seven days a week, and translators are available if required. Details will be available on the intranet under "Syngenta Group Compliance Helpline".

Syngenta Group takes compliance violations seriously and will investigate all valid compliance concerns. When a violation has occurred, the appropriate disciplinary action will be taken.

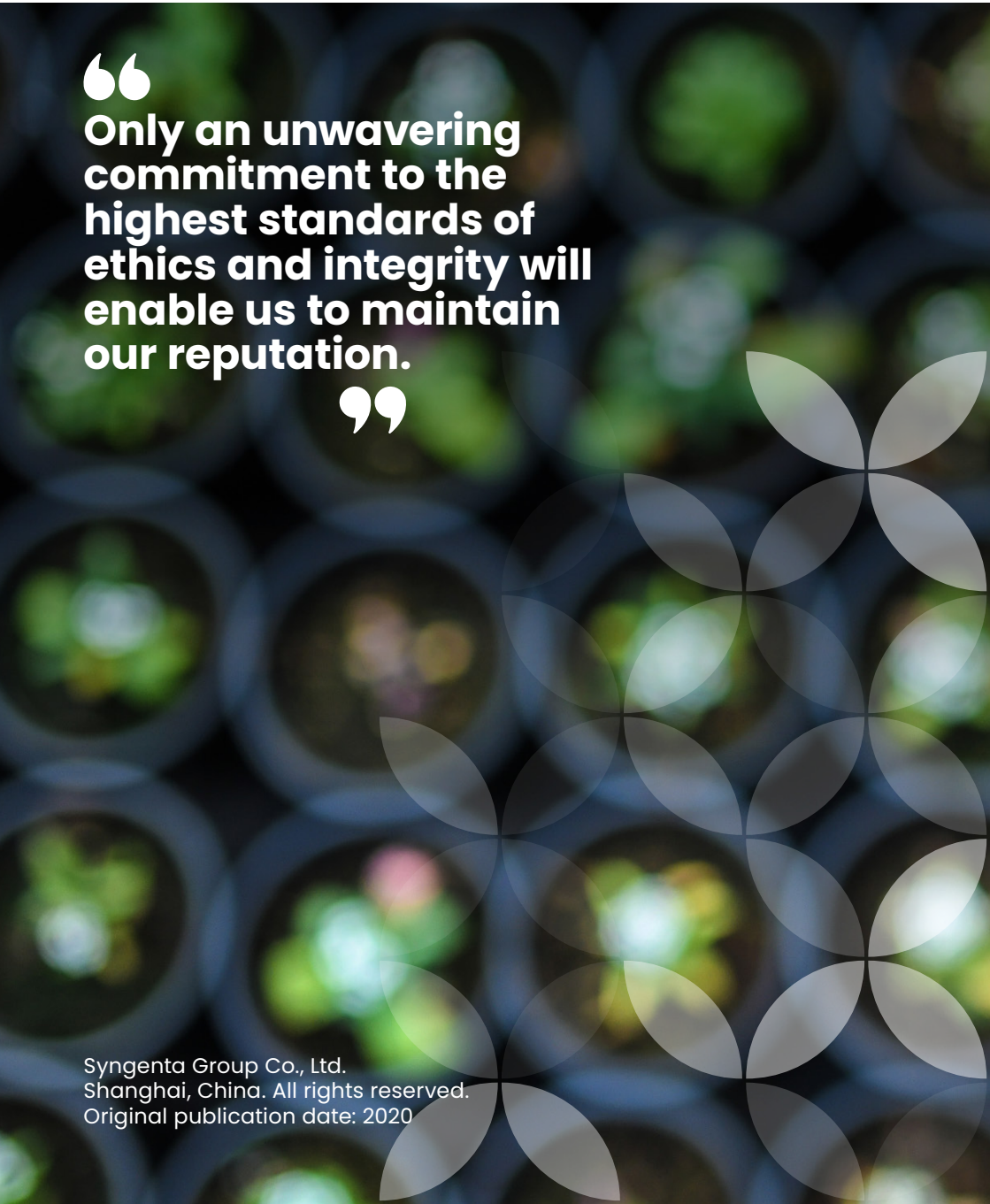


Policies and the Compliance Resource Center

For more details about the different topics in the Code of Conduct, please refer to the Syngenta Group policies and Codes of Practice.

Resources for learning more about Compliance and promoting compliance in your area will be made available to you.

Syngenta Group



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Original publication date: 2020