
Supplier Code of Conduct



Introduction



Syngenta is committed to doing business with the highest standards of ethics and integrity. By upholding high standards, we can ensure we maintain our good reputation within the communities we operate in, meet legal and regulatory requirements worldwide and build a firm foundation for future growth. When our work involves the use of third parties, the same standards still apply.



Read more about the:
Syngenta Group Code of Conduct

This Supplier Code of Conduct is divided into five sections as follows:

1. Ethics
2. Fair Labor Practices
3. Health Safety and Environment
4. Supply Chain and Subcontractors
5. Reporting Concerns and Violation

The requirements in this Supplier Code of Conduct apply to all third parties (referred to as “Suppliers”) engaged in business with Syngenta who supply products and/or services to us, and/or who are engaged in business with Syngenta in any other way. Each Supplier to Syngenta is required to act in accordance with this document and live up to its standards when working with us. If local laws and regulations specify stricter requirements than the standards outlined in this document, then the requirements of those laws and regulations should apply.

Upon request, Suppliers will provide us with relevant evidence and/or participate in reviews in order to check that the requirements of this document are being met. Suppliers are also required to take the necessary steps to address any gaps that are identified.

This Supplier Code of Conduct intends to support our commitment to act ethically and responsibly in business and in the workplace as outlined in the Syngenta Group Code of Conduct.

1. Ethics



At Syngenta, we are committed to conducting business with the highest standards of integrity and responsibility, and to prevent any form of public and private bribery.

Bribery and Corruption

Suppliers will not pay or offer to pay bribes to a Syngenta employee, a government or public official, any other party or family members or friends of the aforementioned. Suppliers will not offer or accept bribes in any form, including incentives, gifts, entertainment, kickbacks and other unofficial (e.g. “unofficial facilitation payments”) or improper payments with the intention to improperly obtain or retain business, permits, certifications etc.

This Supplier Code of Conduct does not distinguish between improper payments made to public officials or private business partners.

Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other applicable laws on public and private bribery.

Business Records and Money Laundering

Suppliers will comply with all anti-money laundering laws and regulations.

When products or services are supplied to Syngenta, Suppliers will ensure that proper written records are kept. Upon request, Syngenta or parties appointed by Syngenta will be entitled to see these records in order to check them.

Fraud

Syngenta has zero tolerance for the act or concealment of fraud.

When doing business with Syngenta, Suppliers will take all necessary steps to prevent fraud and will collaborate in any investigation of suspected fraud related to Syngenta.

1. Ethics

continued



Conflicts of Interest

All business transactions must be conducted with the best interests of Syngenta in mind.

Suppliers have an obligation to avoid conflicts of interest. Suppliers must not benefit improperly through their relationships with Syngenta employees, their family members or friends. Equally, no Syngenta employee, its family members or friends may personally benefit in an improper way from a relationship of Syngenta with a supplier. Suppliers will proactively disclose to Syngenta any constellation that could constitute a conflict of interest, e.g. a Syngenta employee having personal relationships to or financial interests in the Supplier's business.

Fair Competition

Suppliers will ensure that business is conducted in an open and competitive manner, and that all business practices fully comply with applicable competition laws, wherever they are conducted.

Trade Compliance

Suppliers will adhere to applicable international trade control laws and regulations, including those relating to economic sanctions, customs requirements and export controls. Such requirements also include not participating in boycotts or other restrictive trade practices.

Intellectual Property

Suppliers will respect Syngenta and third party intellectual property rights.

Confidentiality and Information Security

Suppliers will safeguard Syngenta confidential information and property (including any and all equipment, drawings and specifications), not disclose it to third parties (including customers, subcontractors, etc.) without the prior written permission of Syngenta, and only use it for the purpose for which it was provided.

Any cyber incidents (including phishing, data breach, suspected or realized cyber security breach) that may impact Syngenta information – including information being stored, processed or shared with sub-contractors – must be reported to Syngenta Cyber Security (Cyber.Security@syngenta.com) without delay.

Data Privacy

If and to the extent Suppliers are processing personal data, Suppliers will comply with laws, enactments, regulations (including but not limited to General Data Protection Regulation (Regulation (EU) 2016/679) as applicable to such data processing.

Suppliers will ensure that all personal and sensitive information and data relating to Syngenta employees and business partners is kept confidential and in accordance with applicable data privacy laws and standards and contractual requirements. Suppliers will not transfer, sell or trade any such information and data.

2. Fair Labor Practices



At Syngenta, we strive for fair labor practices and fair treatment of everyone by following the highest standards in compliance with local laws, and national and international codes and conventions.

Freedom of Association and Collective Bargaining

Where recognized in accordance with local laws, the Supplier shall recognize unions and collective worker representations for collective bargaining and negotiation purposes regarding the terms and conditions of employment.

No employee or employee representative of the Supplier must be subject to discharge, discrimination, harassment, intimidation or retaliation for exercising his or her lawful right to associate or bargain collectively.

Working Hours / Wage and Benefits / Conditions of Work

Suppliers will adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Wages should reflect at least the minimum wage or the appropriate prevailing wage, whichever is higher. Suppliers will comply with all legal requirements on wages and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, Suppliers together with Syngenta will work with business and labor experts to take appropriate actions that seek to progressively realize a level of compensation that does.

2. Fair Labor Practices

continued



Suppliers will not require employees to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular working week of employees will not exceed the limit defined by local law or ILO regulations whichever is more stringent. The regular work week will not exceed 48 hours. Employees will have the right to at least 24 consecutive hours of rest in every seven-day period. All overtime work will be consensual and will be compensated at premium rate. Overtime will not be requested on a regular basis. Other than in exceptional seasonal circumstances, the sum of regular and overtime hours in a week will not exceed 60 hours.

Child Labor

Child labor is considered any work or activity that interferes with the schooling of a child and/or is mentally, physically, socially or morally dangerous and harmful to children.

Suppliers will not use any child labor as defined by and in accordance with national laws and regulations. We expect that no person will be employed under the age of 15, under the age for completion of compulsory education, or under the minimum age as specified by local law, whichever is higher. An exception for farm work exists, however only if accepted by local law and only under the strict frame of work specified in annex 1 of this document. Any persons employed between the ages of 15 and 18 years old must not be exposed to activities that could harm their physical, mental or psychological development.

Diversity and Inclusion

Suppliers will promote all aspects of diversity and inclusion in their workplaces.

Discrimination, Harassment and Abuse

Suppliers will ensure that all hiring, placement, remuneration, advancement, training and disciplinary decisions are consistent with local law.

Suppliers will commit to maintaining a workplace environment free from any discrimination. No person will be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

Suppliers will treat every employee with dignity and respect. Harassment and/or abuse is prohibited in any form including physical, sexual, psychological and verbal.

Illegal, Forced, Bonded and Compulsory Labor

Suppliers will not use or benefit from any illegal labor, including illegal migrant labor.

Suppliers will take appropriate steps to ensure that they do not directly or indirectly participate in, or benefit from, any form of forced or bonded labor such as: physical or mental coercion; captivity; the use of trafficked workers; the withholding of personal documents or items; wage deductions; or any similar conditions that prevent workers from freely terminating their employment with the supplier.

3. Health, Safety and Environment



As a leading global company committed to sustainable agriculture, we have a responsibility to protect the environment, and to ensure the health and safety of our employees, customers and the communities in which we operate. HSE performance plays a key part in developing and protecting our reputation with all our stakeholders.

HSE Policy, Resources and Objectives

Suppliers will have appropriate policies, management systems and resources in place to ensure that all their activities are managed in a responsible manner, in compliance with all applicable legal requirements and the standards outlined in this Supplier Code of Conduct.

Suppliers will set objectives to reduce risks to health, safety and the environment and meet the health, safety and welfare needs of all members of the workforce, including people with disabilities. Suppliers will have formal plans and adequate resources to achieve these objectives.

HSE Risk Management

Suppliers will have appropriate HSE risk management processes in place that effectively identify site/location hazards and mitigate to an acceptable level all associated health, safety and environmental risks.

Occupational Health

Suppliers will have appropriate controls in place to manage health risks to acceptable levels in order to:

- Prevent ill health
- Promote good health and
- Address any impact of changes in health on an employees' and contractors' ability to work.

3. Health, Safety and Environment

continued



Safety

Suppliers will have appropriate controls in place to manage safety risks to acceptable levels in order to:

- Prevent incidents and injuries
- Improve safety performance and
- Manage the consequences of safety incidents.

Environment

Suppliers will have appropriate controls in place to manage environmental risks to acceptable levels in order to:

- Prevent environmental incidents
- Minimize pollution and
- Manage potential environmental liabilities.

Environmental Sustainability

Suppliers will work towards:

- Measuring the impact of their normal operations on the environment in so far as they relate to products or services supplied to Syngenta (e.g., Greenhouse gas emissions, energy consumption, water consumption, and waste).
- Setting targets and taking action to minimize as far as possible the impact of their normal operations on the environment.
- Identifying and delivering environmental impact improvement opportunities associated with the products or services supplied to Syngenta.

Suppliers will keep Syngenta informed of progress on request.

Emergency Preparedness

Suppliers will have processes in place to effectively respond to and manage potential emergency situations in order to minimize their impact with regard to people, assets, communities, customers and the environment.

Training and Competence

Suppliers will ensure that all employees and contractors understand basic HSE requirements and the hazards and risks of the activities they undertake and have the relevant knowledge to perform their job without causing harm to themselves, to others, or to the environment.

Audit and Compliance

Suppliers will carry out regular internal HSE Audits to the extent necessary to provide them with assurance on their compliance with legal requirements and these HSE standards.

Reporting, Evaluation and Improvement Plans

Suppliers will have systems in place to report, investigate and learn from HSE incidents and to establish improvement plans to address HSE performance gaps.

Communication and Consultation

Suppliers will have appropriate systems in place to enable them to have effective HSE communications with employees, contractors, suppliers, customers and regulators. Where appropriate, Suppliers will proactively engage with their local communities and neighbors with regard to any HSE and other concerns.

4. Supply Chain and Subcontractors



Through partnerships with various organizations we aim to ensure that our suppliers adopt appropriate standards in key areas and we support them in continuously improving. We want to ensure that our Suppliers are committed to applying the same standards throughout their supply chains.

Sustainable Procurement

Suppliers will have appropriate systems and controls in place to promote compliance with the principles of this Supplier Code of Conduct within their supply chain. Such systems and controls will include evaluation of the risk of non-compliance, supply chain due diligence and remediation of non-compliance.

Subcontractors

If the use of subcontractors is permitted, Suppliers will make sure that any subcontractors engaged in connection with the provision of services or products to Syngenta also comply with this Supplier Code of Conduct.

Conflict Minerals

Suppliers will notify Syngenta of any direct or indirect use of conflict minerals (Tin, tantalum, tungsten and gold) in products supplied to Syngenta.

Suppliers will also ensure that products supplied to Syngenta do not contain minerals or derivatives that originate from conflict regions or directly or indirectly finance or benefit armed groups.

5. Reporting Concerns and Violation

Syngenta takes compliance seriously. If you suspect that somebody is not complying with the principles of this Supplier Code of Conduct, please let us know immediately so that we can look into the matter.



You can do this at:

www.syngentacompliancehelpline.com

Annex 1

Further Guidance on Child Labor for Farm Work

We expect that no person is employed under the age of 15, under the age for completion of compulsory education, or under the minimum age as specified by local law, whichever is higher. An exception for farm work exists, however only if accepted by local law and only under the strict frame of work specified below.

1. A minor, between the age of 12 and 15 may work, in parallel with studying, on a farm owned or operated by the parent or person standing in place of their parents [a guardian] as long as the following conditions are met:
 - The minor freely reports their wish to help and learn at the family farm if interviewed outside the farm.
 - Work is supervised at all times by a parent or guardian.
 - Not likely to be harmful mentally, physically, socially or morally dangerous for their health or development.
 - Not such as to prejudice their attendance at school, their participation in vocational orientation or training program approved by the competent authority or their capacity to benefit from the instruction received.
 - Work does not take place at night, does not consist of heavy lifting duties or hazardous work conditions, defined as:
 - Operating or assisting to technically operate any type of machine, including tractor and power engines
 - Felling, bucking, skidding, loading, or unloading timber
 - Working from a ladder or scaffold (painting, repairing, or building structures, pruning trees, picking fruit, etc.) at a height of over 2 meters
 - Working in a confined space (example silo or a storage designed to retain an oxygen deficient or toxic atmosphere)
 - Handling or applying any type of agricultural chemicals.

2. In case national laws or regulations permit the employment, a minor, between the age of 13 and 15 may work, in parallel with studying as long as the following conditions are met:
 - Work does not take place at night, does not consist of heavy lifting duties or hazardous work conditions, defined as:
 - Operating or assisting to technically operate any type of machine, including tractor and power engines
 - Felling, bucking, skidding, loading, or unloading timber
 - Working from a ladder or scaffold (painting, repairing, or building structures, pruning trees, picking fruit, etc.) at a height of over 2 meters
 - Working in a confined space (example silo or a storage designed to retain an oxygen deficient or toxic atmosphere)
 - Handling or applying any type of agricultural chemicals
 - Not likely to be harmful mentally, physically, socially or morally dangerous for their health or development.
 - Not such as to prejudice their attendance at school, their participation in vocational orientation or training program approved by the competent authority or their capacity to benefit from the instruction received.
 - Is with permission of their parent or legal guardian.
 - This is communicated clearly to Syngenta and documented records kept.
 - Is directly supervised.

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