

## **SYNGREDIENT CODE OF CONDUCT AND ETHICS**

### **Objective**

Ethical, social and environmental responsibility is an integrated part of our long-term business strategy.

Recognizing the challenges and opportunities for progress that there are on the supply chain, Syngredient has decided to formalize a set of guidelines to promote responsible behavior on the part of its Directors, employees, clients and strategic partners.

This Code of Conduct and Ethics defines the fundamentals to be adhered to by each partner and employee; it does not replace the applicable national and international legislation, to which clients and service providers must strictly adhere.

### **OUR COMMITMENTS**

Our Code of Conduct and Ethics provides guidance on how we aim to conduct our business for the benefit of ourselves, our colleagues, our company, our suppliers, our clients, our strategic partners and our investors.

### **COMPLIANCE WITH THE LAW**

We are accountable for our actions, and we honor our commitments. Our shared goal of honest and ethical action in everything we do drives our success. As our baseline, we are committed to ensuring that every action we take is in full compliance with the law — and in keeping with our ethics.

### **INSIDER TRADING**

In our work, we may come across confidential information that could impact Syngredient's or another company's stock price. This type of "inside" knowledge cannot be used to gain financial advantage when buying or selling stock or passing this information on to others who may trade on it. Any information that has not been disclosed to the public and that a reasonable investor might use to buy, sell or hold stock in a company is considered to be inside knowledge or "material non-public information."

### **RESPECT IN OUR WORKPLACE**

#### **Diversity**

The diversity of our individual backgrounds, experiences and ways of thinking is what we consider as our strength. We must therefore value the diversity of every member of our team.

### **DISCRIMINATION**

We each have a responsibility to do our part to create an environment in which our colleagues can grow and succeed. We therefore may not make any employment-related decisions (such as hiring, promotion and salary decisions) based on any legally protected characteristics. Such factors may vary by local law, but generally include race, color, religion, sex, gender identity, national origin, disability, age, sexual orientation and marital status.

### **CONFLICTS OF INTEREST**

Syngredient expects everyone to ensure that their activities and interests, whether direct or indirect, do not conflict with those of the Company. Personal interests must be understood in the broadest sense since they concern not only the interests of the employee but also those of any natural or legal person in his or her entourage.

### **GRATUITIES AND GIFTS**

Syngredient will not grant or accept any acts of kindness, gratuities, or gifts with excessive value from its clients, strategic partners and service providers.

## CONNECTING WITH OUR CLIENTS

We always act fairly with our customers and our business partners. We strive to make our services better, faster, easier and more cost effective, and always consistent with this Code and the law.

## PRIVACY

Syngredient ensures that no confidential information about our employees, clients, strategic partners and service providers is revealed, transmitted, or used outside its business relationship with them. After business relations have been terminated, confidential information continues to be confidential in accordance with the applicable agreements and the national legislation.

## FAIR DEALING AND FAIR COMPETITION

We must always engage in fair and ethical sales and marketing practices. This means we emphasize the quality of Syngredient's services, and never disparage or discredit our competitors or their products or services.

## ADVERTISING AND MARKETING

Every claim in our advertisements and marketing materials must be accurate, objective and verifiable. This means that we must research and document our claims prior to publication. Making false or misleading claims contradicts our values.

## CORRUPTION AND MONEY LAUNDERING

Syngredient fights any forms of corruption, bribery, money laundering and unlawful restrictive trade practices. It is critical that we prevent our systems from being used for illegal activities such as money laundering and illicit transactions.

Syngredient pays attention to financial transactions in order to detect money laundering, in accordance with the applicable national legislation, through measures such as checking the country of origin of the funds, the location of the bank, and inclusion on a "black list".

## GLOBAL ASSET PROTECTION

We are committed to operating a community marketplace and all of us should take all reasonable measures to discourage and remove illegal content. If we come across suspicious activities, including listings and transactions that involve illegal items, we take action following legal advice.

## MAKING ETHICAL DECISIONS

When we face difficult decisions at Syngredient, we take the time to think and consider the legal and ethical issues. We carefully consider the implications of your actions and we ask ourselves:

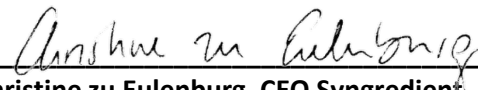
- Is it honest and fair?
- Is it consistent with the law and the Code?
- Does it make me feel good about myself and the Company?
- Would I feel comfortable reading about my action in the news?

If we answered yes to all of these questions, we proceed. If we hesitated in answering "yes" to even one of these questions, we get a second opinion within the team.

## DISCIPLINE

We will take prompt action regarding any conduct that violates the law and/or the Code. We may determine that remedial action (such as training, enhanced controls, or communication) or disciplinary action is necessary. Where there is a potential violation of the law, we will cooperate with the appropriate authorities

Hamburg, 05.03.2020

  
Christine zu Eulenburg, CEO Syngredient