



# Enza Zaden Business Ethics Code

ENZA ZADEN



**Enza Zaden Beheer B.V.**  
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The Netherlands

**Business Ethics Officer**  
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# Foreword

“Our Business Ethics Code broadly reflects how we should behave and conduct our business in different situations. The Code applies to all the members of the Supervisory Board, Board of Directors, hired workers and full and part-time employees of Enza Zaden. It also applies to our business partners – joint venture partners, vendors, distributors and suppliers. What they do can have a direct impact on our reputation. So we expect them to meet the same high standards we do, whether working with Enza Zaden or on our behalf.

The combination of entrepreneurship, initiative and a healthy dose of determination is what has made Enza Zaden great and brought us where we are today. We have a no-nonsense, can-do mentality; we are loyal, and we pride ourselves on our teamwork. The Business Ethics Code is a practical guide that helps us to do the right thing every day.

I encourage you to familiarize yourself with Enza Zaden’s values and how we put them into practice based on the Code. Our Business Ethics Officer, Aniek Verhaar, is your contact person for any questions you may have about compliance with the Code. For our senior leadership and for me personally, compliance with the Business Ethics Code is essential to maintaining our Enza culture of openness and trust, and, in turn, to maintaining Enza’s beliefs and success.”

Jaap Mazereeuw, [Chief Executive Officer](#)

## **The Board of Directors**

Jaap Mazereeuw

Hein Bemelmans

Dirk Neelis

Andreas Sewing

Allison Thomas

# Our principles

## 1 Integrity

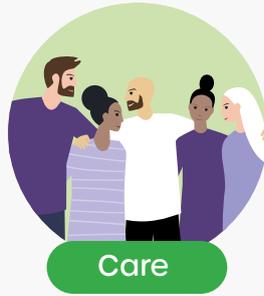
- Our behavior is based on honesty and fairness.

## 2 Compliance with Legislation

- We obey the law and expect the same of our business partners.
- We expect all our employees to comply with applicable laws and regulations.
- We do not misinterpret or find ways around any clear and undisputed laws. If these laws clash with generally accepted ethical standards, or if they are inconsistent with the Enza Zaden Business Ethics Code, get in touch with someone in higher management or arrange for appropriate legal advice through the Legal department in Enkhuizen, the Netherlands.

# Our values

Shared values define our company culture. These are the values that we all consider important, that we all believe in and that we reflect in how we conduct ourselves – in every subsidiary, worldwide.



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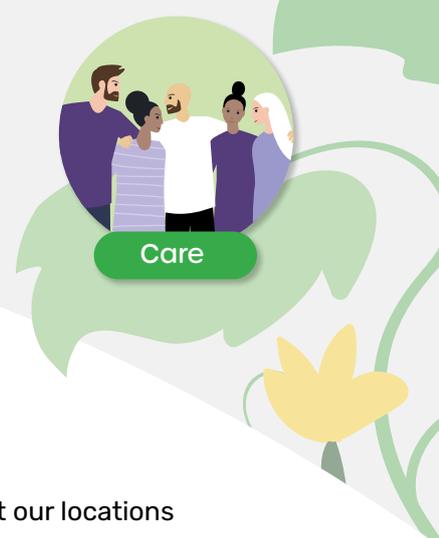
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## We support each other and do it together.

How does that work in practice?

- We are a **family** business. We work on the basis of **trust**.
- We are **open-minded** and welcoming to all, regardless of race, religion, skin color, gender, sexual orientation or preference, and ethnic or national origin.
- **Everybody counts**. For us that is key to working together effectively.
- We challenge and address each other in a **safe way**. That leads to even better results.
- We **do not tolerate verbal or physical abuse, discrimination, or harassment**. Harassment in the workplace is unwelcome, offensive and disrupts our colleagues' work.
- As part of our job at Enza Zaden, we give our company the necessary **personal information** about ourselves. Enza Zaden is **committed to protecting** this information in keeping with data privacy laws. If you have questions about safeguarding personal data, want to access or modify your personal information, or are unsure whether certain data is considered personal data, please contact your HR business partner or Data Privacy Officer at [privacy@enzazaden.nl](mailto:privacy@enzazaden.nl)
- We are committed to providing a safe and healthy work environment for everyone who works at or visits our facilities. We observe **strict health and safety and environmental protection (HSE) rules** at our locations.
- Employees or guests at our locations participate in all required safety and health training. They always wear the required safety gear and never tamper with safety equipment or systems.
- We pay **fair wages** and equal payments by local standards.
- We uphold **freedom of association** and the right of collective bargaining. We aim to improve living standards.
- We believe that helping to improve **quality of life in society**, particularly in the communities where we work and live, is fundamental to our success.
- When making business decisions, we consider our social responsibility and environmental, social and governance (ESG) factors.
- We comply with human rights principles.
- We do not tolerate child labor, prisoner labor, or any other form of forced or compulsory labor. We **do not tolerate child labor and forced labor**, both at our own locations and those of seed producers and suppliers. Within our industry organizations, we work with other plant breeders, as well as with NGOs, to keep this issue high on the agenda and to look for solutions together.



## **We have the courage to challenge each other and hold each other accountable.**

How does that work in practice?

- **The Business Ethics Officer is responsible** for overseeing Enza Zaden's compliance processes and for ensuring that this Code is communicated to our employees.
- **Day-to-day responsibility for compliance and ethics is a job for all and especially the managers of Enza Zaden.** They set an example by living up to the values and demonstrating the importance of ethics and compliance through action. They are responsible for implementing this Code, if necessary, through more detailed guidance tailored to local needs.
- As an essential part of our philosophy for doing good business, Enza Zaden conducts checks on compliance with applicable laws and internal procedures. **Local management is responsible** for this compliance. In addition, we conduct internal audits to check compliance and make recommendations.
- We **encourage** everyone to speak up and address issues or behavior that is inconsistent with the Enza Zaden Business Ethics Code.

## **We believe in balance and in making hard choices to stay focused. We actively encourage and appreciate a pioneering spirit.**

How does that work in practice?

- **Entrepreneurship** and innovation are in our **DNA**, and lead to wonderful results. We encourage and appreciate these qualities.
- We will keep looking at what we do or do not do to achieve our goals, because self-reflection and critical thinking is important. Therefore, we consciously look for balance and sometimes have to make straightforward choices to keep the right focus.
- **We conduct our business honestly**, without resorting to corrupt practices or bribery. **This means we do not give or receive anything of value for the purpose of encouraging improper actions or gaining an improper advantage.**
- As a global organization, Enza Zaden is subject to various anti-corruption laws around the world. **Complying with global anti-corruption laws**, including the U.S. Foreign Corrupt Practices Act (FCPA), means that neither we nor our third-party agents, such as consultants, vendors, or freight forwarders, ever bribe or attempt to bribe a government.
- Gifts and hospitality must be reasonable, proportionate, and appropriate to the circumstances. To learn more about our integrity standards please refer to our **Anti-Bribery and Corruption Policy**.
- **Enza Zaden does not make political donations.** Charitable donations are permitted when not given with any corrupt intent; they are fully transparent and recorded fairly. If you have questions regarding anti-corruption laws or our anti-bribery standards, please contact the Legal department.
- We are committed to **fair and lawful competition** in compliance with existing regulations. We do not enter into any agreements with competitors resulting in anti-competitive practices. Please refer to our Competition Policy for details.
- **We honor the trade, import and export laws of all countries in which we operate, and comply with all the applicable laws and regulations.** We expect our business partners to do the same. Each of us is responsible for knowing the laws that apply to us and seeking expert advice if in doubt. All activities involving sanctioned countries must be reviewed by the Legal department to ensure compliance with trade control laws.



**We work agile and use our business knowledge to stay fast and be the first. We go the extra mile and share our passion for the product and our impact.**

How does that work in practice?

- We have a **quality management system** in place to ensure that our products comply with our product specifications. Our processes are subject to internal and external audits.
- We take all necessary measures to **prevent and control the introduction and spread of pests and diseases** of plants and plant products. We comply with pest quarantine regulations and report incidents to the authorities.
- We are open about what we are doing, and **we communicate product specifications** with our customers and will not withhold relevant information after customers.
- We respect the **Convention on Biological Diversity and the Nagoya Protocol**, and we acknowledge that countries have sovereign rights over their natural resources.
- We aspire to operate in **harmony with the environment** and to minimize our environmental impact as much as possible. Our Sustainability Committee is focused on our strategy for this (such as setting our global sustainability objectives).
- We are dedicated to using energy efficiently and reducing our carbon footprint. Our goals in this area are formulated in **Enza Zaden's Sustainability Strategy**.
- We aim to reduce the use of pesticides and land surface area, by **developing resistant, high yielding and healthy varieties**.

**We have the freedom to operate and we trust each other to get the job done. We set clear standards to use our freedom responsibly.**

How does that work in practice?

- We are **professionals** and experts in our own field.
- We find it important to give our employees **sufficient autonomy and to trust each other** so that together we can overcome our challenges. In this context, clear frameworks within which everyone can work are important. They allow us to **use our freedom responsibly**.
- All employees are asked to **handle corporate resources responsibly**, such as products, tools, intellectual property, brands, budgets and other company assets. These must be used exclusively for business purposes.
- We **avoid conflicts of interests**; situations in which a personal interest might conflict with the interests of Enza Zaden. We will not supervise anyone with whom we have a close personal or family relationship. If we face (potential) conflicts of interest, we approach the Legal department for guidance.
- We will **not enter into business relationships with companies in which we have a personal interest**, either directly or indirectly, without prior approval of the Board of Directors of Enza Zaden.
- We are conscientious in **handling confidential business information**. Such information may not be used for personal benefit or for the benefit of third parties, even after termination of the employment relationship.
- We protect our varieties and innovations with appropriate **intellectual property protection** measures and take action against infringing parties, if necessary. Our intellectual property rights (including trade secrets) are protected in accordance with internal security regulations.
- We **respect the intellectual property protection rights filed by others**.
- We **publicly disclose significant research and development results** in an objective and accurate way.
- We **give free access and full support to internal and external controllers and auditors**, for both regular reporting and audits.

## We proudly share our stories of success and of our impact. We always stay true to ourselves.

How does that work in practice?

- We value our professional differences because they often lead to new insights or successful results.
- We express our pride and talk about our global impact, so we can inspire others both inside and outside Enza Zaden. Please note that all public or external speaking engagements related to Enza Zaden's business or products must be pre-approved by our Communications team.
- We demonstrate self-awareness to be able to live authentically and align our actions with our values and beliefs. Being self-aware, we are more likely to act with integrity and consistency.
- We seek to understand ourselves, our thoughts, emotions, behaviors and tendencies. This helps us grow and evolve as individuals. We can create better relationships and make better decisions if we understand our own motivation and biases.
- In certain geographical areas, we implement several additional checks and measures as part of the corporate sustainability due diligence standards.
- If an Enza Zaden employee is in an unpleasant work-related situation or experiences psychological stress, they can approach their HR business partner or confidential counsellor for support and guidance. Contact details for confidential counsellors can be found at EnzaPlaza.
- If you see or suspect any illegal behavior, fraud, or violation of our policies or procedures, **speak up**. Raising a concern about misconduct is not disloyalty to one's colleagues or Enza Zaden; it is a step towards containing potential issues before they lead to problems and damage the company's reputation or harm our colleagues. Please refer to our Speak Up! Procedure at How do we do business page at [www.enzazaden.com](http://www.enzazaden.com) for more details.
- Enza Zaden will **not tolerate any retaliation** against an employee who in good faith raises concerns or assists in an investigation of suspected wrongdoing.

# Questions & Information

This Code does not anticipate every situation you may encounter, nor does it remove the need for using common sense of professional judgement. When in doubt, ask the following questions:

- 1 **Is this legal?**
- 2 **Is this in line with our Business Ethics Code?**
- 3 **Would I feel comfortable discussing this beforehand with my family or colleagues?**
- 4 **Would I want to read about this in the newspaper?**
- 5 **Would I accept full responsibility for this decision?**

If your answer to any of these questions is “no” or if you are uncertain, stop, speak up and seek guidance. You can contact your manager, the Legal department or Aniek Verhaar, our Business Ethics Officer.

More information about our ethics and integrity efforts can be found at [www.enzazaden.com](http://www.enzazaden.com)

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