

Enza Zaden Business Ethics Code

April 2018



Enza Zaden Beheer B.V. P.O. Box 7 1600 AA Enkhuizen The Netherlands **Business Ethics Officer**

Wijgert Gooijer

Phone: +31 228 784 615 E-mail: speakup@enzazaden.nl



Enza Zaden Business Ethics Code

Foreword

In this business ethics code, Enza Zaden describes its rules of conduct: the ethical principles that underpin all the activities of Enza Zaden and its employees. This business ethics code reflects the broad outlines of how we should behave and conduct our business under various circumstances and in different situations. All Enza Zaden employees are obliged to comply with both the letter and spirit of this code and to help others do the same.

Enza Zaden wishes to be clear about its standards and values. Social developments are making the standards and values more explicit and stringent. Enza Zaden regards it as an important part of its role, in both economic and social terms, to set out its specific rules of business conduct. This will let Enza Zaden remain – in the interests of customers, shareholders, employees, suppliers and other stakeholders – a company that acts with care and integrity.

The Board of Directors Jaap Mazereeuw Hein Bemelmans Vincent van Bentum Joep Lambalk Joost Gietelink



Our Principles

1. Corporate Responsibility

 Enza Zaden acknowledges the corporate responsibilities deriving from its activities as a company. In particular, this affects its responsibilities for working conditions, as well as respect for society and the environmen

2. Integrity

o At Enza Zaden, corporate behaviour is based on integrity, fairness and honesty. This allows us to represent the interests of our customers, business partners and the public fairly.

3. Compliance with Legislation

- o Enza Zaden adheres to the law and expects the same from its business partners.
- o We demand compliance with applicable legislation from all our employees.
- o We do not misinterpret or circumvent any clear and undisputed laws. If these laws clash with national law or generally accepted ethical standards, or if they are inconsistent with the Enza Zaden business ethics code, obtain advice from higher management or arrange for appropriate legal advice through the Legal Department of Enza Zaden in Enkhuizen, 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. Our values are:

- People: everybody matters!

- Entrepreneurship: making a positive difference!

- Customer first: we try harder!



People: everybody matters!

We respect each other as unique individuals. We respect cultural and religious differences, and we respect the environment we work in. We believe in long-term relationships and cooperation, and we support each other during bad times and good. We are honest and transparent in our communication and cooperation. We believe that teamwork is the key to success: All the people in the process are important and should be recognised as such. We cooperate on a basis of trust and give each other substantial freedom to operate. We focus on achieving results and prioritise that over personal interests.

4. Anti-discrimination policy

- o We are open-minded and welcoming to people regardless of e.g. race, religion, colour, gender, sexual orientation or preference and ethnic or national origin.
- o We treat people with fairness and respect.
- o We do not tolerate discrimination, harassment or verbal or physical abuse.

Working conditions: health and safety

- o We maintain good working conditions for our employees.
- o We pay fair wages by local standards.
- o We uphold freedom of association and the right of collective bargaining.
- o We observe strict health and safety and environmental protection rules at our sites.

6. Social responsibility

- o We aim to improve the living standards of people.
- o We try to cultivate friendly and helpful relations with local farmers and farming communities.
- When making business decisions, we take our social responsibility into consideration, as well as nature, climate and the environment.

7. Human Rights

- o We comply with human rights principles.
- o We do not tolerate child labour, prisoner labour, or any other form of forced or compulsory labour.



Entrepreneurship: making a positive difference!

We are continuously identifying new opportunities and developing innovative products for existing and new markets. We encourage innovation in order to improve our products, marketing and processes. We empower and challenge people to develop, take responsibility, think outside the box and make a difference within Enza Zaden.

8. Fair Competition

- o We are committed to fair and lawful competition in compliance with existing regulations.
- o We do not enter any agreements with competitors resulting in anti-competitive practices e.g. for prices. We do not coordinate the company's market behaviour with that of competitors.
- o We avoid contacts or discussions with competitors with respect to anti-competitive subjects: we distance ourselves actively from such contacts or discussions.

9. Sound business practices

- We conduct our business honestly, without resorting to corrupt practices or bribery. This means that we
 do not give or receive anything of value for the purpose of encouraging improper actions or gaining any
 improper advantage.
- o Gifts and hospitality must be reasonable, proportionate and appropriate for the circumstances.
- o Enza Zaden does not make donations to political individuals or entities. Charitable donations are permitted when not given with any corrupt intent; they must be fully transparent and recorded fairly.
- o We ensure that third parties providing services to us or acting on our behalf do not engage in bribery or corruption.

10. Conflicts of Interest

- o We always aim to do the best for Enza Zaden.
- o We will not enter business relationships with companies that we have a personal interest in, either directly or indirectly, without the advance approval of the Board of Directors of Enza Zaden Beheer BV.
- o We will never use Enza Zaden intellectual property, material or information for personal gain.
- o We will not supervise anyone with whom we have a close personal relationship.

11. Respectable business partners

- o We choose respectable business partners. We work professionally, respectfully and transparently with our business partners, abiding by all financial and other regulations.
- o We maintain and develop business relationships based on the laws and our business ethics code. Failure to respect this may end our business relationship.



Customer First: We Try Harder!

We try harder or, in other words, we try to go a step further than our competitors. We do this by:

- Focusing on serving all customers in the chain. From growers, traders, supermarkets and the processing industry to consumers
- Making the best quality products for every product market segment.
- Being the first to introduce our products onto the market

Producing the best seed, delivered on time

12. Product Quality

- o We have a quality management system in place that ensures our products comply with our product specifications. Our processes are subject to internal and external audits.
- o We take all necessary measures to prevent and control the introduction and spread of pests and diseases of plants and plant products. We respect the regulations on quarantine pests and report incidents accordingly to the competent authorities.

13. Breeding Policy

- o We develop our varieties through conventional breeding methods. We will make a public announcement if we start introducing commercial varieties that could be deemed to be genetically modified varieties.
- o We are open about what we are doing and we communicate product specifications with our customers.

14. Biodiversity; nature, climate and the environment

- o We respect the Convention on Biological Diversity and the Nagoya Protocol and we acknowledge that countries have sovereign rights over their natural resources.
- o We aspire to operate in harmony with the environment and to minimise our environmental impact as much as possible.
- o We are dedicated to using energy efficiently and reducing our (relative) carbon footprint.
- o We aim to reduce the use of pesticides by developing resistant varieties.

15. Intellectual Property

- o We protect our varieties and innovations with appropriate intellectual property protection measures and take action against infringing parties if necessary.
- o Our intellectual property rights (including trade secrets) are protected in accordance with internal safety regulations.
- o We respect the intellectual property protection rights filed by others.



Protection of data and corporate resources; accountability

16. Protection of data and corporate resources

- o Enza Zaden is conscientious in its handling of 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.
- o All personal data and information that Enza Zaden uses is collected, processed and stored in accordance with applicable data protection legislation. This is only done where it is required and authorised. This data will only be transferred to third parties if so required by law, by contract or with consent of the owner.
- o All employees are requested to act responsibly with corporate resources such as products, tools, intellectual property, brands and other company assets. These must be used exclusively for business purposes.

17. Full accountability

- o All our books and accounts must be accurate and sufficiently detailed and may not include false, artificial or misleading content.
- o We write down all vital procedures governing our administration, operations and business transactions.
- o We give free access and full support to internal and external controllers and auditors, for both regular reporting and audits.

Ouestions and Information

The Enza Zaden business ethics code applies to all transactions, large or small, and drives the behaviour expected of every employee of all our group entities worldwide. Employees are personally responsible for their own compliance. Management plays an important role in leading by example and providing appropriate responses to queries.

This business ethics code does not anticipate every situation you may encounter, nor does it remove the need for using common sense or professional judgement. If you are 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.

Who can I contact?

More information can be found on:

EnzaPlaza > Our Company > Business Ethics Code & Speak Up.

April 2018 version