Ethics and integrity

Compliance:
A guide for third parties

syngenta

i By ‘third parties’, we mean people or companies who supply products or services either to Syngenta or on our behalf.

ii A ‘public official’ may include, but is not limited to:

- Any person holding an office or working for or on behalf of a government entity at any level (e.g. a regulatory official or government inspector)
- Any person working for a government-owned or controlled enterprise, or a public national or international organization (e.g. a government-owned school or university)
- Any person performing a public function or providing a public service, even if that person works for a non-governmental institution
- Any person who is considered a public official under local law.

Doing the right thing – together

Living up to our ethical standards is not only the right thing to do, but it is also critical to the efficiency and reliability of our operations.

Syngenta is committed to doing business with the highest possible standards of ethics and integrity. By upholding high standards, we can ensure we maintain our good reputation, meet legal and regulatory requirements worldwide and build a firm foundation for future growth.

When our work involves the use of third parties, we want the same standards to apply.

We've produced this guide to give you an overview of the minimum standards to adhere to when we conduct our business together. When we work together, we would like you to follow these principles so that legally, ethically and morally, we're living up to the same standards.

Many of you may already have your own ethical policies and procedures in place. We're not asking to supersede or replace any of your existing policies or contractual obligations. The aim of this guide is to share our standards and principles with you and ask you to act in accordance with them and live up to them when you're working with us.

If you have any questions, please get in touch with your Syngenta contact or the Compliance team directly at:

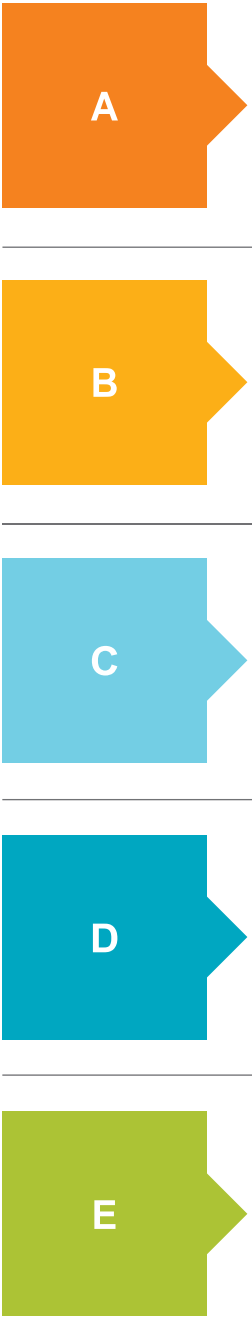
syngenta.compliance@syngenta.com

Together we can ensure that we do business in the right way.

1.
We don’t allow bribery, kickbacks or other unofficial payments

We are committed to conducting business properly with full transparency and without engaging in any form of bribery or other corrupt behavior. You must not offer or accept bribes to obtain an undue or improper advantage for Syngenta.

We expect you to understand and apply the following principles:



We don't pay bribes

Bribery goes against our values. We don't pay, offer to pay or receive bribes in any form, including kickbacks and other unofficial or improper payments.

We prohibit all types of bribes

A bribe is a bribe, regardless of whether it takes the form of cash, an excessive or lavish gift, an employment offer or a charitable contribution. Anything which is offered or received with the intention of improperly influencing a business decision for or on behalf of Syngenta is considered a bribe.

We don't allow facilitation payments

You must not offer or make any 'facilitation payments' to public officials when acting on behalf of Syngenta. These unofficial, nominal fees are designed to secure or speed up a routine action that the official is obliged to perform, such as issuing a license or allowing goods through customs.

We make no distinction between public and private bribery

We don't support bribery, whether it's to public officials, private business partners or members of their family.

We keep records of business dealings

When you supply products or services to Syngenta, we ask you to keep written records of this work. On occasion, Syngenta – or parties appointed by us – may ask to see these records in order to check them.

2.
Gifts and entertainment must not influence business decisions

While we recognize that gifts and entertainment are often seen as an established part of business, it is vital that they must never improperly influence, or seem to improperly influence, a business decision.

Gifts and entertainment which are provided in the absence of any clear business justification or legitimate purpose, and are intended to improperly influence or obtain a business decision, are considered a bribe. All forms of bribes are prohibited by Syngenta.

When doing business with or on behalf of Syngenta, you must not offer to a Syngenta employee, a government or public official or to any other party on our behalf any gift or entertainment which is inappropriate, excessive or could be seen as attempting to improperly influence a business decision.

3.
We will not tolerate fraud

The deliberate misuse of company resources for personal enrichment by Syngenta employees or third parties is fraud.

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

When you're doing business with Syngenta, we require that you support our anti-fraud stance and help us in any investigation of suspected fraud that involves or impacts our business.

4.
We do not condone, facilitate or support money laundering

We only conduct business with reputable third parties who are involved in legitimate business dealings, using funds derived from legitimate sources.

You must comply with all applicable laws and regulations that prohibit money laundering. Syngenta business shall not be misused for money laundering purposes.

5.
We avoid conflicts of interest

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

You must not benefit improperly through your relationships with Syngenta employees.

Equally, no Syngenta employee may personally benefit in an improper way from a relationship with another individual or organization.

6.
We prohibit anti-competitive behavior

Competition laws apply to all business arrangements, whether they are in written, oral or any other form. Price fixing, bid rigging and other anti-competitive behaviors are prohibited.

You must ensure that your business on behalf of Syngenta is conducted in an open and competitive manner, and that all business practices fully comply with applicable competition laws wherever they are conducted.

7.
We are committed to safe working conditions

We are committed to ensuring the safety of our employees and complying with all applicable health and safety laws and regulations.

When you work with us, we ask you to comply with all applicable health and safety laws and regulations, and to create safe working conditions and a healthy work environment for workers at all premises under your control.

8.
We comply with environmental standards

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

You must comply with all applicable environmental laws, guidelines and standards relevant to operations, whether at your own premises or those of Syngenta.

9.
We respect trade controls and economic sanctions

We follow 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.

Likewise, we require you to respect all relevant trade controls and economic sanctions.

10.
We source materials responsibly

We are committed to sourcing all materials used in our business responsibly.

We ask you to take a similarly responsible approach. This includes implementing supply chain due diligence policies and making sure that the money you pay to others for materials does not go to groups or people who violate employment laws, engage in violence or are involved in the abuse of human rights.

11.
We respect intellectual property and confidential information

We retain the ownership of all intellectual property that we create. You must respect intellectual property rights and safeguard Syngenta confidential information, customer and employee information.

You should only use Syngenta information and property (including equipment, drawings and specifications) for the purpose for which they were originally provided.

You should take appropriate steps to safeguard and maintain the confidentiality of Syngenta's proprietary information. This includes maintaining it in confidence and in secure work areas and not disclosing it to third parties (including other customers, subcontractors, etc.) without the express prior written permission of Syngenta.

12.
We respect data privacy

We take strict measures to protect the data in our care.

You should keep all personal and sensitive information relating to Syngenta employees and business partners confidential and in accordance with applicable data privacy standards and contractual requirements.

You should not transfer, sell or trade personal information with other third parties.

13.
Subcontractors must uphold the same standards

We require subcontractors working on our behalf to ensure that they comply with our standards.

We ask you to make sure that any subcontractors you employ to carry out business for Syngenta also comply with our standards. In addition, you must notify Syngenta in writing prior to using subcontractors, and the use of contractors must be expressly permitted by the relevant contractual agreements between us.

How to report/raise concerns

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

You can do this by sending an email to:

syngenta.compliance@syngenta.com

Any questions?

We hope this guide gives you a clear idea of how we would like you to do business when you work with Syngenta. If you have any questions please get in touch with your usual contact at Syngenta or email syngenta.compliance@syngenta.com and we'll do our best to help.

Committed to doing business with the highest possible standards of ethics and integrity

Syngenta is one of the world's leading companies with more than 28,000 employees in some 90 countries dedicated to our purpose: Bringing plant potential to life. Through world-class science, global reach and commitment to our customers we help to increase crop productivity, protect the environment and improve health and quality of life.

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Bringing plant potential to life

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