Vylor

We Are Upstanding:

Our Code of Conduct

A Message from the CEO

Colleagues,

Success is built by people who are bound together by an extraordinary culture.

At the center of that culture is our purpose, rooted in Our Values—one of which challenges us to Be Upstanding. That means we always do what's right, maintaining high ethical standards and conducting business safely and transparently, no matter what demands are placed upon us. Our customers and stakeholders expect nothing less—and that is what we should expect of each other.

Each one of us is accountable for our own ethical behavior. The Vylor Code of Conduct provides guidance to help us do just that. It is not a list of rules, but a practical resource that gives us a blueprint to conduct business while adhering to the highest ethical standards.

If you ever have questions, raise them with your leader. We encourage curiosity, conversation, and diversity of thought as we adapt to the changing world around us.

When it comes to doing business, it's not just about what we do—it's about how we do it. Our commitment to Be Upstanding is critical to sustaining our culture and successfully navigating the journey ahead of us.

—Chuck Magro
Chief Executive Officer

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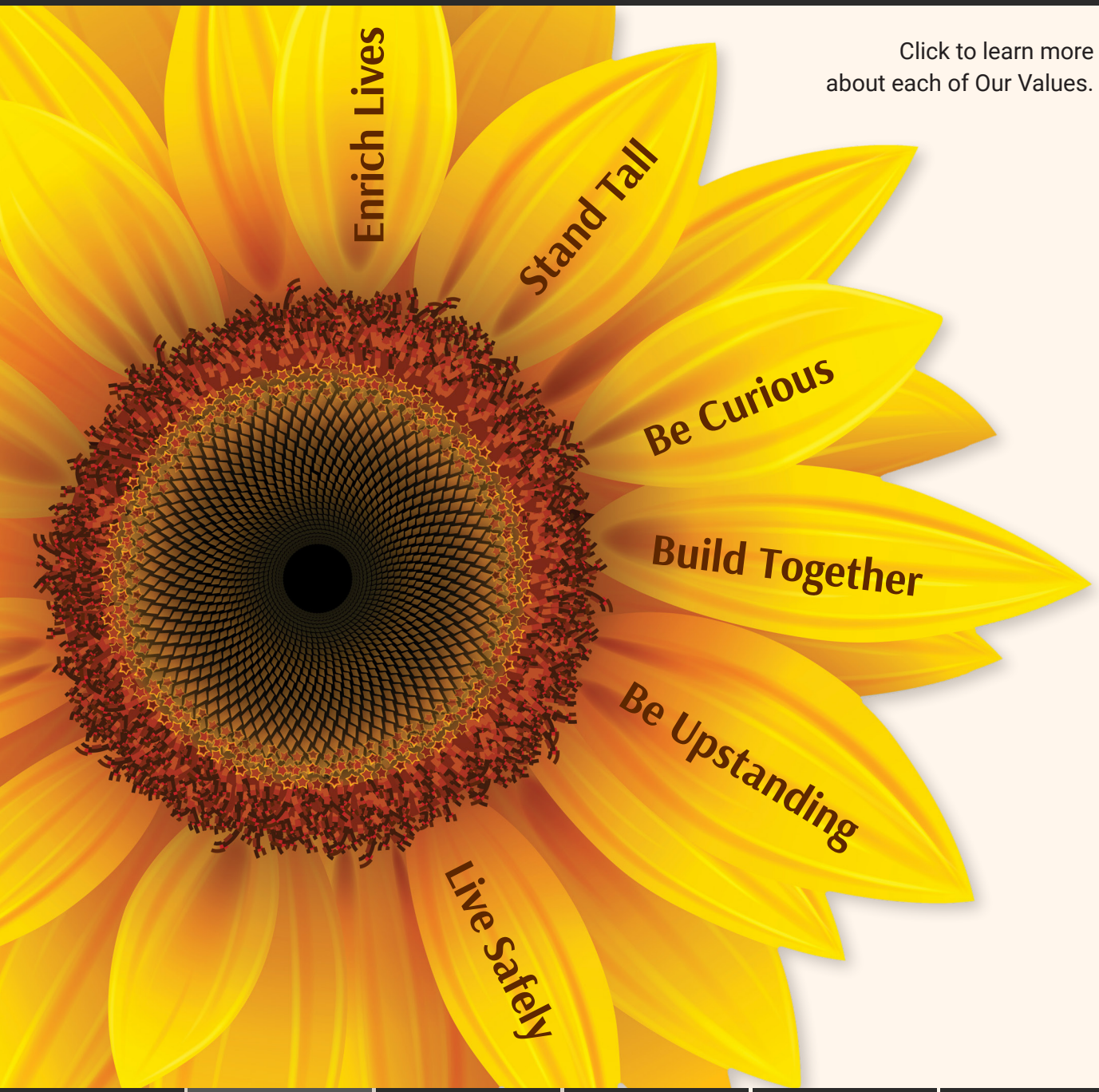
We Are Upstanding



Click to learn more about each of Our Values.

Our Purpose

To enrich the lives of those who produce and those who consume, ensuring progress for generations to come.

We Follow Our Values

Our Values are at our core. They tell us who we are and what we stand for. They are the fundamental beliefs that drive our decisions and help shape our culture. Our success depends on all employees embracing and living Our Values at all times.

Our Values Sustain Us

When we live by Our Values, we are more focused and more productive. They align us toward a common purpose and build cohesion and consistency as a company.
Our Values guide us and provide us with a vision for the future.

Our Code Is a Practical Document

Our Code is not a list of rules. It is a practical resource, providing a blueprint for ethical decisions and actions. By reading and understanding our Code, we learn how to act in accordance with Our Values—even when we face difficult situations. Our Code helps us protect our business, create and sustain a strong company culture, and ensure our success.

Remember that our Code of Conduct itself is incapable of action. It is not responsible for these outcomes; we are.

How to Use Our Code of Conduct

Our Code is divided into sections to guide us on how to Be Upstanding.
Our Code also provides resources for asking questions or reporting ethical concerns.

We are expected to:

- Read our Code, understand its contents, and consult it often.
- Understand how our Code relates to our own work.
- Understand our responsibilities, as described in our Code.
- Ask questions if we are unsure of our responsibilities.
- Know how to report ethical concerns and understand the importance of doing so.

Scope

Our Code of Conduct is applicable to all company employees. This includes our employees working in joint ventures.

We Are Responsible

Everyone's Responsibilities

We are all accountable for upholding Our Values. We must be ethical and transparent in our business dealings and treat our colleagues, customers, and business partners with fairness and respect. We must Be Upstanding.

We fulfill our responsibilities when we:

- Uphold Our Values in everyday business activities.
- Understand and embrace our Code, including company policies and procedures.
- Comply with all applicable laws, regulations, and company policies in the countries where we do business.
- Bring up questions or concerns as discussed in Speaking Up and Seeking Help.
- Report suspected ethical violations, as discussed in Speaking Up and Seeking Help.
- Cooperate with investigations of misconduct.

Expectations of Leaders

Employees look to those in leadership roles to model ethical behavior. Leaders have a profound effect on the ethical culture of our company as well as the safety and welfare of those they lead. As a result, these positions come with additional responsibilities.

Leaders have responsibilities to:

- Model the highest ethical behavior.
- Communicate often about how employees can support Our Values.
- Treat all employees fairly.
- Encourage employees to raise questions and concerns without fear of retaliation.
- Take prompt action to manage reports of suspected misconduct.
- When an employee raises a question or concern that may be difficult for the leader to resolve, follow the guidelines in Speaking Up and Seeking Help.

How to Be Upstanding (Making Ethical Decisions)

Our Values Guide Our Choices

Our Values guide our decision-making and behaviors. Ask the following questions to help you navigate difficult situations.

What are my responsibilities in this situation?

What Values may be affected by this decision?

How does our Code of Conduct apply?

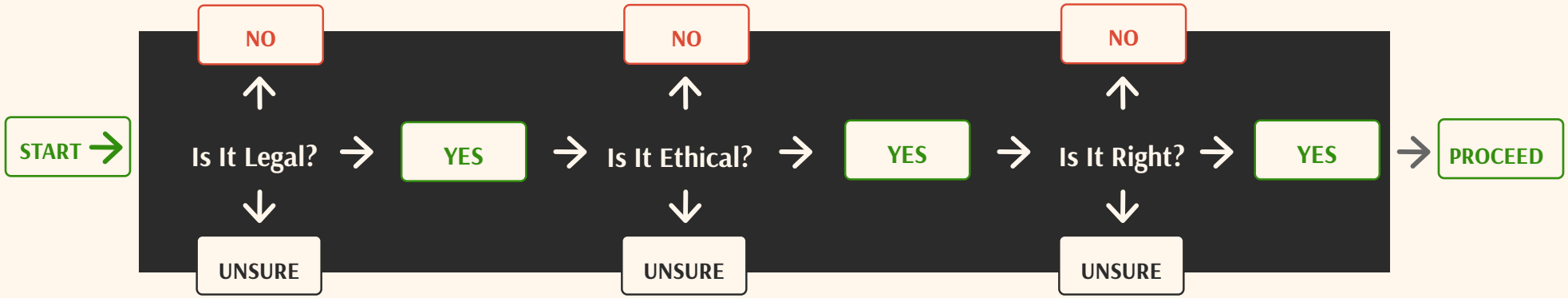
Do I have legal responsibilities that I must consider?

Who/what will be affected by this decision?

- Customers?
- Shareholders?
- Colleagues?
- Business partners?
- Local communities?
- Government officials?
- Competitors?
- Me, my family, or relatives?
- Land, environment?

Once you have thought through your responsibilities and the consequences of each decision, you can take the following steps to help you resolve the issue.

Click each box below to reveal more.



We Foster a Respectful Workplace

We grow by working with others. We work together best when we treat everyone with dignity and respect. Together, we create a work environment that is positive, productive, and always professional.

How We Stay Upstanding

To foster a respectful workplace, we:

- Avoid words or actions that others may find offensive or unwelcome.
- Speak up if we witness harassing, offensive, or violent conduct.
- Treat each other with dignity, respect, decency, and fairness.
- Value each of our colleagues' contributions.
- Promote a supportive and open community.

Harassment and Disrespectful Behavior

Harassment and other disrespectful behavior can include:

What we say or write (in person or electronic communication, including social media):

- Racial, ethnic, religious, or gender-based slurs.
- Derogatory comments or jokes.
- Gossip.
- Stereotypes.
- Using threatening, loud, vulgar, or abusive language, gestures, or sounds.

What we do:

- Unwelcome physical contact or sexual advances.
- Offering job benefits in exchange for sexual favors.
- Inappropriate use of company computers and communication systems.

What we display:

- Pornographic or sexually suggestive photos.
- Offensive slogans, posters, cartoons, or images.

We Promote Equal Opportunity

We are committed to growing a workforce based on merit and fair treatment. We do not discriminate. We recognize and value all people, regardless of their beliefs or outward appearance.

How We Stay Upstanding

To promote equal opportunity, we:

- Give each other fair and equal treatment.
- Base employment decisions on ability and merit only.
- Accommodate those with legally recognized disabilities.
- Refuse to accept any excuses for discrimination.

Equal opportunity means we:

- Hire and promote people based on their skills, experience, and goals, in alignment with the needs of our business.
- Never discriminate in any terms or conditions of employment. This includes:
  - Recruitment.
  - Hiring.
  - Promotion or demotion.
  - Transfer.
  - Selection for training.
  - Termination.
  - Rates of pay or other forms of compensation.
- Never discriminate against any employee or applicant because of:
  - Age.
  - Race.
  - Religion.
  - Color.
  - Gender.
  - Disability.
  - National or ethnic origin.
  - Ancestry.
  - Marital or family status.
  - Sexual orientation, gender identity, or expression.
  - Veteran status.

We Are Inclusive

At Vylor, we aspire to embrace our differences to enrich lives, advance innovation, and boost company performance. As a global company, it's critical to employ a workforce that represents the farmers we serve and the markets in which we operate. Fostering an inclusive culture that seeks out different perspectives and ideas enables a deeper understanding of our customers and consumers around the world—and fuels the curiosity, creativity, and innovation needed to be successful over the long term.

How We Stay Upstanding

To be inclusive and foster a culture of belonging, we:

- Ensure everyone has the opportunity to contribute fully.
- Recognize and embrace the differences of all colleagues.
- Interact with those different from ourselves in ways that make them feel valued.
- Build teams where unique perspectives are welcomed.
- Share information and seek input from all team members.
- Search for different points of view to find solutions.
- Listen with courtesy and respect.
- Speak up if we feel our views or those of others are not respected.

An inclusive workforce:

- Advocates for candor and encourages openness.
- Creates an environment where employees feel able to bring their whole selves to work and are empowered to speak up, participate, and contribute.
- Is made up of a variety of qualities, characteristics, perspectives, and experiences.

We Keep Our Workplaces Safe

Living safely means that we embrace safety and the environment in all we do.

How We Stay Upstanding

To maintain a safe and healthy workplace, we:

- Make sure everyone feels safe to speak up, ask questions, and raise concerns without fear of retaliation.
- Never tolerate violence. This includes verbal or physical threats, intimidation, bullying, and coercion.
- Speak up if we witness violent actions or threats.
- Never take or direct anyone else to take avoidable risks in the workplace.
- Know and follow our health and safety policies, procedures, and standards.
- Report unsafe conditions, behaviors, and workplace hazards.
- Are authorized and expected to intervene and reassess hazards whenever safety is in doubt.
- Proactively prevent job-related injuries, illnesses, and incidents.
- Follow procedures related to injury, emergencies, and emergency drills.
- Do not possess or use illegal drugs or other altering substances in the workplace. We never report to work impaired.
- Call law enforcement or first responders in case of imminent danger.

We Deal Fairly and Honestly

We conduct business ethically. Every time we represent the company, it is our chance to make a positive impression. We speak with pride, honesty, and transparency about our work to promote trust, confidence, and a sustainable business.

Preventing Bribery and Corruption

Our business thrives through transparency and trust. We never offer or accept any improper incentive.

To prevent bribery, kickbacks, and other forms of corruption, we:

- Never offer or accept bribes or kickbacks.
- Keep accurate and complete records so all payments are transparently described and company funds are used lawfully.
- Never use an agent or other third party to make improper payments.
- Never provide any unofficial fees or "facilitating payments."
- Follow policies related to giving and receiving gifts and entertainment.
- Only do business with customers and business partners who share our commitment to integrity.
- Decline business opportunities rather than pay bribes.
- Report any concerns about potentially improper payments to Legal.
- Know who we are dealing with and conduct timely and appropriate due diligence on business partners.

Corruption and Bribery

Bribe: A payment (money, gift, or other thing of value) offered in exchange for favor.

Kickback: A payment (money, gift, or other thing of value) made to someone who enabled or facilitated a transaction or appointment.

Facilitating Payment: An unofficial fee paid to expedite a permit or other routine government action.

Bribes, kickbacks, and facilitating payments:

- Are often illegal and can result in fines and even prison time for those involved.
- Harm communities and business relationships and put our reputation at risk.
- Are never tolerated in any form.

Working with Government Officials

It is crucial to understand the rules when conducting business with a government official of any country, whether directly or through a third party.

We should review any anticipated gifts, entertainment, or payments to a government official with Legal and Government Affairs first.

Who are government officials?

- Officers and employees of government-owned or state-owned commercial enterprises.
- Officers and employees of national, federal, regional, local, or other governmental departments, agencies, and other entities.
- Academics of publicly funded or owned universities.
- Members of Congress, Parliament, or other legislative bodies.
- Candidates for political office, political parties, and political party officials.
- Officers, employees, and representatives of public (quasi-governmental) international organizations.
- Any person acting as an official government figure. This includes family members or private persons.

We Compete Ethically and Responsibly

We grow our relationships with high-quality products and unparalleled services. We do not have discussions with competitors about manipulating markets. We obtain competitive information ethically and legally.

Free and Fair Competition

Fair marketplace competition is based on service, product, and price.

Violations of competition or antitrust laws can include agreements among competitors to:

- Fix or control prices.
- Set other terms and conditions of sale (for example, credit terms).
- Boycott specified suppliers or customers.
- Allocate customers, products, territories, or markets.
- Limit the production or sale of products.

Violations of competition laws will result in significant consequences. This includes fines, damage to our reputation, and even prison sentences.

How We Stay Upstanding

To stay upstanding with our competitors, we:

- Obtain competitive data legally and ethically.
- Represent ourselves or our reason for requesting information truthfully and honestly.
- Represent our competitors' products accurately.
- Respect our competitors' business relationships without interference.
- Do not discuss or negotiate customer pricing, bidding processes, or dividing markets with competitors.
- Compete fairly and lawfully regardless of our market strength or market information.

To stay upstanding with our suppliers and customers, we:

- Deal fairly with all parties, avoiding any false or dishonest practices.
- Behave professionally during negotiations and treat everyone with respect.

We Build Strong Partnerships

We choose to do business with partners who share our commitment to the highest ethical standards. We are committed to the protection and advancement of human rights and will not tolerate the use of forced labor, slavery, human trafficking, the exploitation of children, or their engagement in hazardous work.

How We Stay Upstanding

To build strong partnerships, we:

- Use equal and fair treatment with all our suppliers and business partners.
- Choose partners who best meet our business needs and objectives.
- Make objective decisions based on quality, price, service, and ethical business practices.
- Avoid inappropriate gifts or any other kind of favoritism.
- Never share another company's confidential information, except with permission.
- Communicate and collaborate honestly with our business partners.
- Ensure procured technology protects our company assets and information.
- Prohibit the physical punishment, abuse, or servitude of any child or worker within company or third-party operations.

Ethical Procurement Practices

We do not make any purchases through illegal or unethical means. We meet and set the standards for fair business dealings across the world.

We stay upstanding by ensuring that each payment is:

- Justified and reasonable in value according to industry norms.
- Properly documented and clearly defined in scope and purpose.
- Made by check, bank transfer, or credit note to the specified business entity, per payment terms defined in the agreement.
- Payable or charged to only the business entity and not to individual officers, employees, or agents.
- Free of any falsification, misrepresentation, or deliberate overbilling.
- In accordance with standard, written trade terms. This includes paid commissions, rebates, credits, discounts, and allowances.

We Disclose and Resolve Conflicts of Interest

We act in the best interests of the company. We do not let personal interests interfere, or appear to interfere, with our role in the company.

Potential conflicts of interest may include:

- Outside activities or employment that interferes with our duties at Vylor.
- Personal and family relationships with anyone in agriculture. Examples include:
  - Family-owned farms.
  - Sales agents.
  - Suppliers.
  - Distributors.
  - Competitors.
- Romantic relationships with a leader, direct report, or business partner.
- Significant financial interests in a competitor, customer, or business partner.
- Business opportunities discovered through our work for the company.
- Advisory boards or outside consulting about agriculture or company topics.

How We Stay Upstanding

To resolve conflicts of interest, we:

- Understand what a potential conflict of interest is and why it's important to avoid.
- Immediately disclose any potential conflicts to our leader.
- Cooperate with our leader and others to avoid, manage, or resolve actual and perceived conflicts of interest.

Conflict of Interest

Question: My parents own and operate a farm that does business with Vylor. Do I need to disclose this to the company?

Answer: Yes. Employees' personal relationships may not intersect with their work at Vylor, but they could create the appearance of doing so. Disclosure allows the company to put mitigating actions in place when family members work in the areas in which we do business.

Gifts and Entertainment

Business relationships can help our company thrive. In some settings it may be appropriate to give or receive gifts to strengthen relationships. But we avoid gifts that affect, or appear to affect, our decisions.

Entertainment includes meals and drinks, hospitality, travel, lodging, and social events. Gifts include anything of value and are generally tangible items.

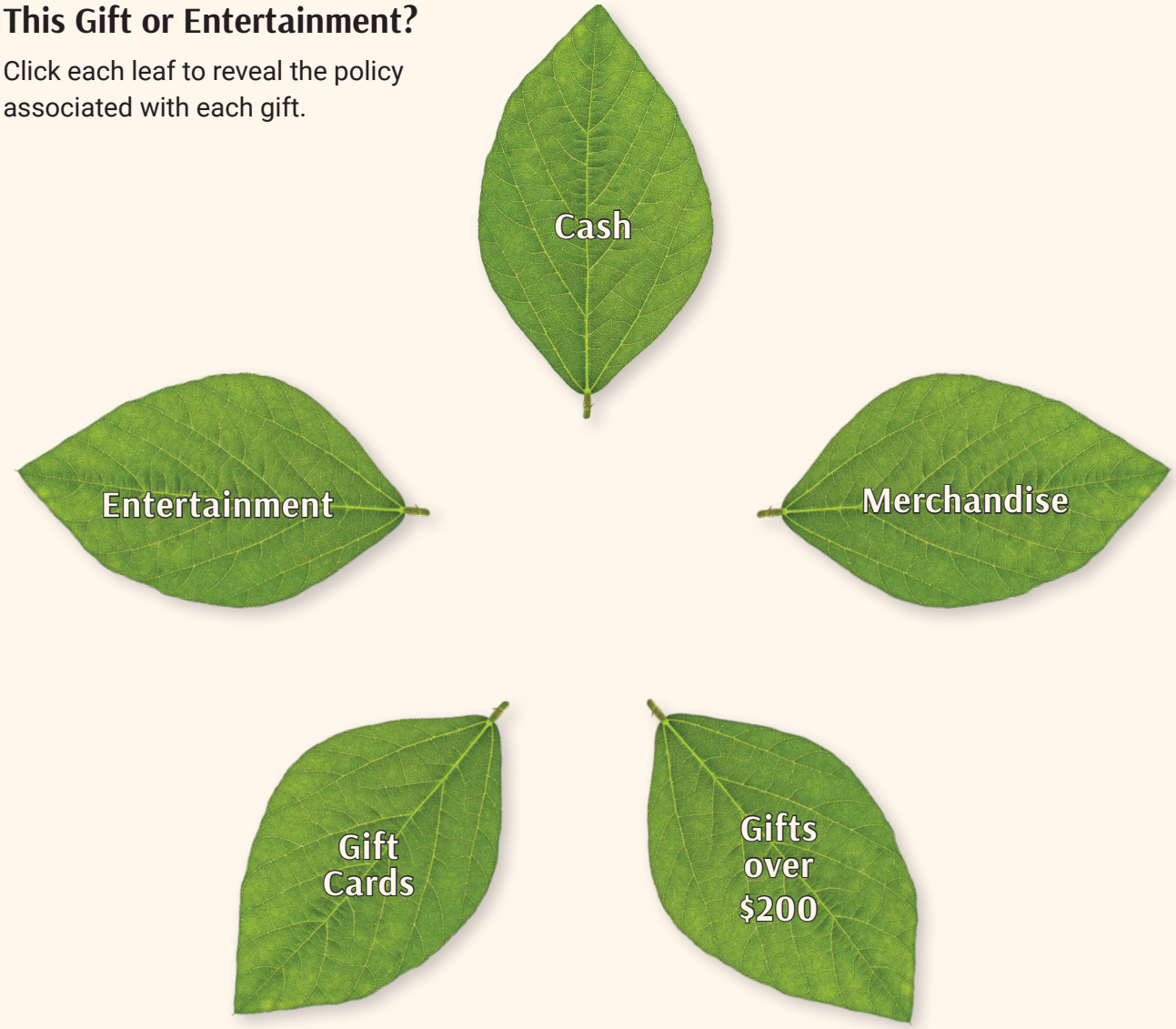
Gifts and Entertainment

Question: An outside business partner has gifted me a watch. Its value exceeds $200 USD, which is the maximum value designated as "acceptable" at Vylor. I don't think this gift constitutes a bribe. However, I want to uphold our company's Gift and Entertainment policy without being rude. What should I do?

Answer: We recognize that gift-giving is an intrinsic part of some business communities. Our policy isn't meant to disrupt the normal course of business. Rather, it ensures that we do business ethically and free from undue influence. If you accept the gift, immediately disclose it to your leader and seek Executive Leadership approval since the value exceeds $200 USD. You should then donate the watch to a company charity and disclose it on your annual Business Ethics and Compliance Certification.

Can I Give or Accept This Gift or Entertainment?

Click each leaf to reveal the policy associated with each gift.



Giving Gifts and Entertainment

Any gift or entertainment we provide must:

- Be for a proper business purpose.
- Be legal and accurately documented.
- Be permitted by our policies and the recipient's policies.
- Be reasonable in value, appropriate, and consistent with Our Values.
- Not be cash, gift certificates, or other cash equivalents.
- Not be intended to secure an improper advantage.
- Not be intended to improperly influence the recipient.

Consult Government Affairs prior to giving any gifts or entertainment to government officials.

Accepting Gifts and Entertainment

It is important to avoid even the appearance of improper conduct. To ensure the integrity of our procurement processes, we must:

- Not ask for gifts.
- Not accept cash, gift cards, or cash equivalents.
- Not accept gifts that could sway our decisions.
- Avoid gifts that might be interpreted as a bribe.
- Avoid gifts or hospitality from competitors.
- Accept only small gifts on an infrequent basis.

Seek Executive Leadership approval and disclose any gifts that exceed $200 USD in value or entertainment that exceeds $500 USD in value. Stricter value limits may apply to local organizations or within specific functions.

We Comply with International Trade Laws

We lead the way in our field by making connections and bridging barriers across the globe. To do so, we comply with all applicable laws that govern international trade.

How We Stay Upstanding

To comply with international trade laws, we:

- Never recruit, market, or distribute anything across international borders without first knowing the relevant regulations.
- Follow our policies and procedures designed to address and comply with trade regulations.
- Never market, sell, or provide services to businesses or people on embargo or sanction lists.
- Conduct risk assessments and due diligence checks on business partners.
- Alert Ethics and Compliance if we are asked to participate in a boycott.

Boycotts and Trade

Many countries have laws requiring a company to either refuse or not refuse to do business with another country. For instance, U.S. laws generally prohibit U.S. companies from cooperating with international boycotts not sanctioned by the U.S. government.

Violations of import and export controls, trade sanctions, and boycotts can result in severe fines, revocation of permits, or even imprisonment. By following these regulations, we protect our company and make the world a safer place.

We Do Not Engage in Insider Trading

We Stand Tall in our industry. We never engage in insider trading. Doing so would undermine our reputation as an ethical leader in the marketplace.

How We Stay Upstanding

To avoid insider trading, we:

- Do not trade securities of our company or another company based on inside information.
- Maintain confidentiality of company information.
- Do not tip or signal nonpublic information to anyone outside of the company.
- Only trade once material, inside information has been publicly disclosed. In addition, follow company policy and wait until any applicable trading blackout period has expired.

Inside Information

"Inside information" is any material, nonpublic information a reasonable investor would consider when deciding to buy, hold, or sell securities of the company. This may include:

- Changes in expected earnings or unusual gains or losses.
- Mergers, acquisitions, divestitures, or investments.
- Major product releases or significant regulatory developments.
- Major developments related to litigation.
- Changes in executive management or restructurings.
- Gain or loss of a significant customer or supply source.

It is against the law to trade in a company's securities while possessing material inside information. The penalties for violating these laws are severe. If in doubt, do not trade, and contact Legal for guidance.

We Use Company Assets, Technology, and Information Responsibly

As innovators, we are curious and embrace technology and information. We protect company assets, technology, and information. We use them thoughtfully and with care. Doing so protects our relationships and strong reputation.

How We Stay Upstanding

We use company assets, technology, and information responsibly by:

- Safeguarding computers, portable devices, passwords, data, and credit cards from improper access or theft.
- Using company-provided phones, computers, and other technology for company business. We keep our personal use of company assets to a minimum.
- Respecting company security settings and only accessing information for which we are authorized.
- Not using, taking, selling, or giving company or another party's assets, technology, or information without specific authority to do so.
- Ensuring our use of new technology, like artificial intelligence, protects an individual's privacy, secures our data, respects intellectual property rights, incorporates meaningful human oversight, and demonstrates transparency.

Company Assets

A company asset is any tangible or intangible resource that has economic value and is owned or controlled by a company. Tangible assets have a physical presence (equipment, supplies) while intangible assets have no physical presence (information systems or information created and used while conducting company business). All company assets are the sole property of Vylor.

We Create, Maintain, and Manage Accurate Records, Accounts, and Statements

We exercise good business writing practices and manage our records and information properly. Doing so reduces risk and drives performance. It also helps us meet legal requirements and commitments to shareholders, customers, and business partners.

What is a company record?

Any type of record created or received while conducting company business. This includes, but is not limited to:

- Agreements and contracts.
- Correspondence, including memoranda, letters, email (including attachments), social media posts, and text messages.
- Photos, digital data, and typed or handwritten notes.
- Policies and procedures.
- Purchase orders and invoices.
- Reports, such as financial, accounting, technical, and sales reports.
- Product information.
- Analyses, formulas, schedules, tables, presentations, and financial models.
- Personnel files.
- Marketing information.
- Business plans.
- Environment, health, and safety information.

How We Stay Upstanding

We manage our records effectively by:

- Identifying, maintaining, safeguarding, and disposing of records in accordance with our records retention schedule.
- Ensuring records are accurate, accessible, organized, and secure.
- Never editing or discarding records in a manner contrary to our retention policy without an approved exception, nor directing anyone else to do so.
- Providing complete and accurate records if requested in connection with an audit, investigation, or litigation.
- Ensuring that our records comply with laws, relevant policies, procedures, and standards.

Improper Recordkeeping

Examples of improper record keeping include intentionally:

- Misclassifying amounts between cost and capital.
- Accelerating or deferring costs or revenue in a manner inconsistent with accounting best practices.
- Misclassifying unsalable inventory as acceptable finished product.
- Falsifying company documents, including:
  - Financial records.
  - Safety records.
  - Research, quality, operations, or test data and reports.
  - Time and attendance records.
  - Travel and expense reports.

We Safeguard Intellectual Property and Privacy

Our future business success depends on innovative products and solutions. Our confidential business information and intellectual property distinguishes us from competitors. We safeguard these assets for our company, employees, customers, and other stakeholders. We must protect them from unauthorized disclosure or misuse.

How We Stay Upstanding

We protect our company by:

- Sharing confidential and proprietary information only with authorized people who have a legitimate business need.
- Securing documents, data, and devices with effective physical measures, passwords, and encryption.
- Labeling and managing files and emails to protect information.
- Not discussing confidential matters in public places.
- Not making confidential information visible to others. This might include working on a laptop during an airplane flight or accessing an unsecured Wi-Fi network.
- Ensuring that only authorized people access company facilities.
- Escorting visitors and not allowing them to enter restricted areas.
- Reporting possible security or privacy incidents or breaches. This includes improper use of personal information.

What are some examples of confidential information and trade secrets?

- Proprietary information such as industrial designs, breeding pedigrees, genetic identities, and chemical formulas.
- Nonpublic financial information, including pricing and projections.
- New product and marketing plans.
- Customer and supplier lists.
- Research and development ideas, plans, data, and processes.
- Manufacturing and seed production processes and related information.
- Procurement information.
- Information concerning potential acquisitions, investments, and divestitures.
- Company application code and designs.

Privacy and Personal Information

We protect the personal data of our employees, customers, suppliers, and other third parties. We collect, use, and process personal data only for legitimate business purposes and in accordance with company policies, contractual obligations, and local laws.

We are often required to provide notice to, and sometimes collect consent from, people whose personal data we collect. Local laws, our policies, and industry standards require security controls for the physical and electronic protection of personal information. Special requirements may apply when transferring personal data across country borders.

We ensure proper use and processing of personal data in all aspects of our business. This includes engaging vendors, entering into contracts, and negotiating acquisitions and divestitures. We limit use and transfer of personal information to the minimum amount necessary for business use.

Personal Information

Personal information is any information sufficient to identify an individual or that relates to an identifiable individual. This can include:

- Name.
- Email address.
- Date of birth.
- Account credentials.
- Business or personal contact information.
- Credit card number.
- Biometric data (e.g., fingerprints, health information).
- Passport number or national identification (ID) number.
- Internet Protocol (IP) address/device ID.

We Protect Our Brands, Trademarks, and Copyrights

Our good name is one of our greatest assets. We safeguard our company name by protecting our brands, trademarks, and copyrights.

How We Stay Upstanding

We protect our brands by:

- Understanding and following our brand guidelines.
- Safeguarding the Vylor brand and tradename, along with its trademarks and copyrights, from misuse or infringement.
- Reporting brand abuse or infringement to Legal.

We Follow Our Internal Controls and Financial Procedures

We follow our controls and procedures, which are designed to ensure reliable financial reporting. This helps us keep the trust of our stakeholders.

How We Stay Upstanding

We help prevent fraud, waste, and abuse by:

- Operating within the framework of the internal controls relevant to our jobs.
- Never bypassing controls and procedures.
- Never failing to execute a control for which we are responsible.
- Reporting concerns immediately, especially if we become aware that an internal control or procedure has been bypassed or overridden.

We Manage and Report Our Expenses Responsibly and Accurately

We never take advantage of company funds or misrepresent their use.

How We Stay Upstanding

We manage and report our expenses:

- Accurately, with receipts, when required, and explanations that support legitimate business expenses.
- Responsibly, by following our guidelines and avoiding unnecessary expenses.
- Promptly, contributing to the overall success of our expense reporting process.

We Are Environmental Partners

To support our way of life and the food that nourishes us, we must work to protect the environment. We uphold sustainable practices by creating high-quality products through safe and responsible production processes.

How We Stay Upstanding

We contribute to our sustainable practices by:

- Proactively minimizing our environmental impact.
- Working with partners and suppliers who share our vision of sustainability.
- Complying with applicable environmental laws and company policies.
- Reporting spills, leaks, or accidental discharges to the appropriate governmental authorities.
- Following our policies and procedures for waste management and recycling.
- Designing, building, and operating our facilities to minimize risks to the public and environment.

We Steward and Deliver Quality Products

We are dedicated to delivering quality products and playing a role in stewardship. We steward products throughout their life cycle and provide education on proper use. Responsibly managing our products throughout their life cycle supports sustainability and is essential to our customers, communities, and consumers.

How We Stay Upstanding

We steward and deliver quality products by:

- Identifying, analyzing, and managing potential risks.
- Providing information for responsible use of our products.
- Encouraging customers to follow regulatory requirements and best management practices.
- Collaborating with customers to use the right products at the right time.
- Conducting rigorous product development and quality assurance for a positive customer experience.
- Transporting chemical and agricultural materials and products safely to minimize the risk of harm.

When Do I Contact Product Stewardship?

- To receive relevant or necessary Stewardship training.
- To discuss Stewardship implications when changing how a product is used.
- To report a product or container that appears out of place.
- To identify a potential issue that requires a review or decision.
- To support new product launches.
- To report an alleged impact a product may have had on a crop or the environment.

Quality Policy Statement

We take pride in delivering our commitment to our customers, building trust by enabling their success. Our employees' and partners' quality values and behaviors are integral to achieving the Vylor Purpose and delivering on our financial commitments. We listen to and understand customer and consumer requirements, to continually improve our performance and their experience in a changing world.

We Contribute to Our Communities

We Enrich Lives by supporting the communities where we live and work. As we partner with society, we strive to address broad challenges in the countries where we operate.

How We Stay Upstanding

We contribute to our communities by:

- Getting involved in charitable activities in our communities.
- Initiating outreach efforts to understand and assist with local needs.
- Following internal procedures before donating company funds or making contributions in the name of Vylor.
- Encouraging (but not requiring) employees or others to contribute to charitable organizations.

We Communicate Responsibly

We communicate information about our company responsibly. Doing so protects our relationships and strong reputation.

How We Stay Upstanding

When we communicate, we:

- Ensure time spent representing the company on social media adds value to our business objectives.
- Make clear that the views we express on social media are our own.
- Avoid creating the impression that we are speaking on behalf of the company when engaging in business discussions.
- Protect the confidential information of our company, customers, business partners, and competitors.
- Respect trademark, copyright, fair use, and trade secret laws, and company brand guidelines.
- Allow designated Media Relations representatives to approve and coordinate media interviews, respond to media requests, and coordinate news releases.
- Consult Media Relations before presentations or events where the media may be present.
- Consult Legal before responding to a request for information from a government agency or official. This includes a dawn raid.

We Participate Ethically in the Political Process

We embrace active participation in the political process and believe it can make a difference in our communities. We also recognize that our personal political activities are separate from our company.

How We Stay Upstanding

Personal Political Activity

When we participate in the political process as individuals, we:

- Are clear that our own political views and actions do not represent those of the company.
- Conduct political activities on our own time, away from our place of employment, and with our own resources.
- Never wear Vylor or other company-branded merchandise or logos.
- Inform our leader and Government Affairs if we decide to run for political office.
- Seek approval before using company locations for political activities or other purposes.
- Speak up if an employee, partner, customer, or stakeholder pressures us into supporting a political party or candidate. Such pressure is prohibited.

Corporate Political Activity

When engaging in political activity on behalf of the company, we:

- Do not support a specific party or candidate unless authorized by Government Affairs.
- Comply with country, state, and local political campaign finance and election laws.
- Engage in the political process as a corporate citizen working with Government Affairs or Legal.
- Never use corporate facilities for political fundraising activities without prior approval from Government Affairs.

Lobbying

While lobbying is a legitimate activity for achieving political and civic change, we must follow applicable laws. We comply with these laws by:

- Following rules regarding public disclosure and reporting requirements related to lobbying activities on behalf of the company.
- Having contact with government officials only if authorized to do so on behalf of the company.
- Never using improper means to influence government agencies, representatives, judges, or legislators.

Always Speak Up

It is our responsibility to speak up and seek help. This means saying something when we see questionable or unethical behavior, or when we have a question about a policy.

An ethical workplace is built on ethical workers. This means we are willing to raise concerns about questionable behavior and hold each other accountable to Our Values. Upstanding conduct is a team effort.

Asking Questions and Getting Help

If an employee has an ethical concern or question, the employee's leader is the first and best resource. There may be times when our leader is not available, or we are not comfortable discussing the matter with them. The following resources are also available:

- Another leader
- Ethics and Compliance Officer
- Legal
- Finance
- The People Team (Human Resources)
- Vylor Global Hotline

Anonymity and Confidentiality

We treat all reports of ethical concerns as confidential. This includes contacts with the Hotline.

Employees may ask to remain anonymous when filing an ethical report. It is helpful when you identify yourself. This enables us to follow up and ensure thorough review of your concern. Ethical concerns involving criminal or illegal activity may be reported to the appropriate authorities.

Zero Tolerance for Retaliation

We can only maintain Our Values if we feel safe speaking up. We do not tolerate retaliation against anyone who in good faith reports suspected misconduct or assists with an investigation. Retaliation is a violation of our Code and will be subject to disciplinary action, up to and including termination of employment. In some cases, retaliation can result in civil and/or criminal penalties.

Investigations

Being upstanding means speaking up when we see something wrong. We promptly, thoroughly, and fairly investigate any reports of ethical misconduct. Employees must fully cooperate with an investigation and provide truthful information. We protect any employee who reports misconduct in good faith—or who cooperates with an investigation—from retaliation.

Should investigations uncover misconduct, those responsible are subject to disciplinary actions, up to and including termination of employment and possible legal action.

Different countries have different laws governing investigations of misconduct. We always conduct our investigations and possible disciplinary actions in accordance with local laws and regulations.

Fair Process and Disciplinary Action

We strive to provide a consistent and fair disciplinary process. Disciplinary actions may include reduction of bonuses and stock options as well as suspension, with or without pay. Serious offenses may result in demotion or termination of employment. Some violations could also result in legal action.

Waivers

There may be rare cases when an employee requires a waiver from some provision of our Code of Conduct. Employees may request a waiver from the Ethics and Compliance Committee. Any waiver for Executive Officers must also be approved by the Governance and Compliance Committee of the Board of Directors and promptly disclosed to all shareholders.

Click each box to learn more about our investigations process.

ALLEGATION

REFERRAL

INVESTIGATION

DELIBERATION

REPORTING

Living Our Values

By investing in the future of agriculture for generations to come, our work helps feed a hungry world. Doing so with the highest ethical standards, according to Our Values, is a privilege and a responsibility. We take this commitment seriously.

By living these Values each day, we make Vylor an upstanding—and outstanding—global leader.

Vylor

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Issued October 2026