

## **Policy on Economic Sanctions and International Trade Controls Compliance**

This Economic Sanctions and International Trade Controls Compliance Policy supplements Rizobacter’s Code of Ethics and applies to all officers, directors, employees, contractors, and third parties acting on behalf of Rizobacter or its controlled companies

Rizobacter conducts business worldwide and is committed to obeying all applicable economic sanctions and trade controls laws, rules and regulations, including through identifying, managing, and minimizing the risks of a violation. Rizobacter is committed to complying with the laws, rules, and regulations wherever it does business (see Code of Ethics section 1.5).

Many countries maintain economic sanctions and trade controls. For example, the U.S. Treasury Department’s Office of Foreign Assets Control (OFAC) has primary responsibility for administering U.S. economic sanctions programs, and the U.S. Department of Commerce’s Bureau of Industry and Security has primary responsibility for administering U.S. trade controls. In the United Kingdom, Her Majesty’s Treasury’s Office of Financial Sanctions Implementation plays the same role with respect to economic sanctions. The Argentine government imposes economic sanctions pursuant to the Customs Code.

**Policy Statement on International Trade Controls and Economic Sanctions:** Rizobacter will not conduct business or have any dealing in, or with the government of, any country or territory that is the subject of comprehensive sanctions (currently, Cuba, Iran, North Korea, Sudan, Syria, and the Crimea region of Ukraine) or with any individuals or entities who are the subject or the target of any economic sanctions adopted, administered or enforced by the U.S. Government, the United Nations Security Council, the European Union, Her Majesty’s Treasury, or any other relevant sanctions authority (collectively, “Sanctions”), unless the business or dealing is permitted by the Sanctions or by licenses from all relevant Sanctions authorities. Rizobacter also will not provide goods or services, directly or indirectly, in violation of any applicable trade controls.

Rizobacter will not tolerate any Sanctions or trade controls violations. Violations—regardless of whether they are intentional or unintentional—may result in disciplinary action and termination. Violations may also result in civil or criminal liability.

Economic sanctions and trade controls vary greatly by country. If you have any questions about Sanctions or trade controls, you should ask the Legal Department or the Internal Audit Department.

[This Q&A section addresses common questions about the Company’s Policy on Economic Sanctions and International Trade Controls Compliance.](#)

***What are Sanctions and trade controls?*** Sanctions and trade controls are limitations that target trade, financial, and other dealings with a country, person, or entity. The subject or target of Sanctions may be a foreign government or government official, all individuals and entities in a comprehensively sanctioned country or territory, or a private individual or entity.

Sanctions can be total or partial. Total sanctions block all dealings with a designated country, person, or entity, while partial sanctions restrict a narrower set of dealings, such as dealing in the longer-term debt of a designated entity. For example, under current U.S. economic sanctions regulations, almost all dealings with the government of Iran and individuals and

entities in Iran are prohibited (which are total sanctions). Partial sanctions block only certain transactions. Under the Sectoral Sanctions (which are partial sanctions) targeting certain Russian financial services firms.

Similarly, trade controls may prohibit all exports to a country, entity, or individual, or they may prohibit only certain exports. Trade controls generally follow the controlled commodity, software or technology, and therefore U.S. trade controls apply to U.S. origin commodities, software and technology, and certain foreign made items that incorporate U.S. origin commodities or software, or that are produced using U.S. origin technology, regardless of where in the world they are re-exported or transferred.

***How can I find out if a person or entity has been sanctioned?*** To find out if a person or entity has been sanctioned, you should ask the Legal Department or designated trade-controls person.

***Who must follow this Policy on Economic Sanctions and International Trade Controls Compliance?*** Everyone who conducts business for Rizobacter must follow this Policy. This includes all officers, directors, and employees, and third parties acting on behalf of Rizobacter.

***How does someone violate Sanctions or trade controls, and what are the penalties?*** Sanctions and trade controls violations can be direct or indirect. In the case of a direct violation, a person does business with a Sanctions target, or goods are sold to a restricted individual or entity. In the case of an indirect violation, the prohibited dealing occurs through a third party. For example, an indirect violation occurs if a company sells goods to a distributor, and the distributor then sells those goods in a comprehensively sanctioned country.

In addition to potential disciplinary action, including termination, for violations of this Policy, an individual may face civil or criminal liability, including fines and imprisonment, for violating applicable Sanctions and trade controls. For example, all U.S. citizens and permanent resident aliens, regardless of where in the world they are located, and all persons in the United States, must follow U.S. Sanctions. Rizobacter may also face liability for the Sanctions and trade controls violations of its officers, directors, employees, and third parties acting on its behalf.

***Can I ever do business with a sanctioned person or entity?*** In certain cases, Rizobacter may seek a license from the applicable regulatory authority to do business with an otherwise sanctioned person, entity, or country. You should ask the Legal Department or the Internal Audit Department. if you have any questions or Sanctions concerns.

***What is Rizobacter doing to prevent Sanctions and trade-control violations?*** Rizobacter is committed to following applicable Sanctions and trade-controls laws, rules and regulations. To ensure compliance, the Company has implemented a screening process to prevent dealings with sanctioned individuals and entities, and to detect exports, re-exports and transfers that may be prohibited by trade controls. Before doing business with a third party, Rizobacter checks if that third party has ties to a country subject to total U.S. Sanctions (Cuba, Iran, North Korea, Sudan, Syria, and the Crimea region of Ukraine). We next check if the third party has ties to a high-risk country (the Balkan countries, Belarus, Iraq, Lebanon, Russia, and Venezuela) as needed. We then check the company, its major shareholders,

officers, its directors, and its beneficial owners to see if they are on the U.S. Specially Designated Nationals and Blocked Persons List (“**SDN List**”). Even if the third party clears all screening and does not have known ties to a blocked or high-risk country, Rizobacter screens the third party, its major shareholders, its officers, its directors, and its beneficial owners whenever the deal is over US\$1,000,000 in value.

***What should I do if I think a coworker or third party has violated, or may violate, Sanctions or trade controls?*** If you suspect that a coworker or third party acting on behalf of Rizobacter has violated Sanctions or trade controls, is violating Sanctions or trade controls, or will violate Sanctions or trade controls, you should report it according to Rizobacter’s Compliance Reporting Policy. Every person in Rizobacter is responsible for helping to ensure that the Company complies with applicable Sanctions and trade controls laws, rules and regulations. Known or suspected violations of applicable Sanctions and trade controls laws or this Policy should be immediately reported to the Legal Department, pursuant to the Company’s Compliance Reporting Policy. No one will face any adverse consequence for raising concerns in good faith. You can also make anonymous reports through the Company’s compliance hotline, which can be accessed at: [www.rizobacter.com.ar/argentina7compliance-hotline](http://www.rizobacter.com.ar/argentina7compliance-hotline).