



**Indigo Agriculture, Inc.**  
**SUPPLIER CODE OF CONDUCT**  
(Last Updated: December 5, 2024)

**I. PURPOSE**

Indigo Agriculture, Inc., and its affiliates, including without limitation Indigo Ag, Inc., Indigo Carbon, PBC, Indigo Agriculture Europe, GmbH (collectively, the “*Company*”) is committed to maintaining the highest standards of ethics and business conduct. The purpose of this Supplier Code of Conduct (the “*Supplier Code*”) is to demonstrate the Company’s commitment to business practices and principles of behavior that promote the highest personal ethical standards in making business decisions and more specifically, in handling supplier relations. To the extent that this Supplier Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, the Company adheres to these higher standards.

**II. SCOPE OF COMPLIANCE**

Suppliers and their employees, agents, affiliates, and subcontractors (collectively the “*Suppliers*”) must adhere to this Supplier Code while conducting business with or on behalf of Company. Suppliers must promptly inform their Company contact (or a member of the Company’s management) in the event Supplier has a reasonable belief that this Supplier Code has or will be violated by Supplier. Suppliers are expected to and shall ensure adequate compliance with this Supplier Code. Company may, from time to time, audit Suppliers or inspect Suppliers’ facilities to confirm compliance with this Supplier Code and Company reserves the right, to require the immediate removal of any Supplier representative(s) or personnel who behave in a manner that is unlawful or inconsistent with this Supplier Code or any Company policy.

**III. SUPPLIER RESPONSIBILITIES & LEGAL OBLIGATIONS**

A. Human Rights

Company complies with all applicable laws and regulations in our business activities and is committed to respecting the rights under the UN Guiding Principles on Business and Human Rights (UNGPs) and the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. Company does not discriminate on the basis of race, color, religious creed, gender, gender identity or expression, national origin, ancestry, age, sexual orientation, physical or mental disability, pregnancy, veteran or military status, genetic information or any other protected class under federal, state or local law and Company requires all Suppliers to conduct themselves in full compliance with the same. As such, Suppliers shall: (i) not engage in unlawful discrimination in any manner (e.g., hiring and compensation practices), and (ii) prohibit any form of child labor, human trafficking, or involuntary labor through threat, force, fraudulent claims, or other forms of coercion and comply with all employment and labor laws.



## B. Environment; Health & Safety

Company is committed to protecting the environment and its employees, and its Suppliers are expected and required to do the same by integrating sound environmental, health, and safety management practices into all aspects of its business. Suppliers must comply with all applicable environmental, hazardous materials, safety, emergency preparedness, occupational injury and illness, machine safeguarding, and sanitation laws and/or regulations. In doing so, Supplier should: (i) establish adequate preventative steps to minimize the cause of hazards, (ii) prohibit the use, possession, distribution, or sale of illegal drugs while on Company property or acting on behalf of Company, (iii) adopt appropriate conservation and preventative hazardous waste measures in its business practice and facilities, (iv) and maintain required environmental permits and registrations.

## C. Compliance with Laws and Regulations

Suppliers must conduct their business activities in an ethical manner and in full compliance with applicable laws or regulations, which shall include without limitation, compliance with and/or adherence to:

- Anti-laundering and anti-corruption laws of the countries in which Company operates (including the U.S. Foreign Corrupt Practices Act).
- Antitrust and fair competition laws in the jurisdiction Supplier operates.
- Record retention laws and regulations.
- Requests by regulatory agency representatives and government officials.
- Conflict of interest prohibitions and disclosures.
- Restrictions or prohibitions on gift giving between interested parties.
- Trade controls, as well as applicable export, re-export, and import laws and/or regulations.

## D. Intellectual Property

Supplier will respect and protect the intellectual property of all parties, including Company, by only using intellectual property in accordance with their associated licenses or terms of use or other business-related purpose communicated by Company. and Supplier is strictly, prohibited from using Company's intellectual property to: (i) create, access store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate, or (ii) send any false, derogatory, or malicious communications.

## IV. **REPORTING**

If you wish to report questionable behavior or a possible violation of this Supplier Code, you are encouraged to work with your primary Company contact to resolve the concern. If this is not possible or appropriate, you may either contact Adam Lazarov, Senior Counsel, [alazarov@indigoag.com](mailto:alazarov@indigoag.com), as the designee of the General Counsel or report such violation to



Company's designated Ethics Hotline located at [hotline.indigoag.com](http://hotline.indigoag.com) or by phone call at 1-800-461-9330.