

CODE OF CONDUCT

It is the policy of Seedco to foster a positive working environment built upon a foundation of mutual trust, respect, open communication, and ethical behavior. Therefore, Seedco expects its employees, interns, and volunteers (referred to in this Code of Ethics as "employees") to act in accordance with the highest standards of personal and professional integrity in all aspects of their work-related activities. These standards include honesty, integrity, civility, mutual respect, and acceptance and support of a diverse work environment.

Employee responsibilities include but are not limited to those listed below:

Protection of Seedco's Information and Resources

All employees shall take appropriate steps to protect and preserve Seedco assets, property, and financial resources. At no time should an employee use Seedco assets or financial resources for personal gain or profit. All employees shall comply with established internal policies and procedures to protect and appropriately use assets and to maintain financial records.

All employees shall protect the private and confidential information of our customers, clients, employees, and others associated with the business of Seedco throughout and after their employment with Seedco. Employees shall not disclose or provide access to non-public information, obtained or developed in the course of conducting Seedco business to anyone other than those who have a legitimate business need to know such information—except when authorized and/or unless legally obligated to do so. This policy applies to all forms of confidential material and information, whether in electronic form or hard copy form.

All employees shall comply with the federal, state, and local laws, regulations, and guidance for the programs in which they work, familiarize themselves with the relevant law, as applicable to their job function, and report any discovery of non-compliance with any federal, state, or local law, regulation, or guideline to Seedco's Compliance Officer.

Employees shall not participate in the submission to any governmental entity a record or report that such person knows is false where the record or report relates to a contract or program that receives funds from the United States, and any employee who learns of a violation of that rule shall notify Seedco's Compliance Office, in writing, of such a violation within 14 days of its discovery.

All employees shall maintain and comply with security procedures, and be alert to situations that may lead to loss, theft, or misuse of assets.

All employees shall refrain from engaging in or knowingly supporting any activity that would not be consistent with the basic aims and values of Seedco.

Employees should not authorize outside use of Seedco intellectual property (copyrighted or trademarked content) if such use gives the appearance of Seedco endorsing another organization's products or company.

Employees who are in doubt about the use of Seedco's name and logo should contact Seedco's Communications department for further guidance.

Any and all rights in data, information, papers, articles, notes, books, or other documents and property produced by an employee within the scope of employment duties and relating in any way to the actual or anticipated activities of Seedco shall belong to Seedco.

Avoidance of Conflicts of Interest

Employees are required to read and adhere to Seedco's Conflict of Interest Policy and submit to Human Resources a completed disclosure form and certification that the Conflict of Interest Policy has been read and appropriate disclosures have been made.

The Conflict of Interest Policy states the employee's duty of loyalty, including his or her duty to refrain from conflicts of interest; provides examples of conflicts; and describes the process for disclosing potential conflicts of interest.

The Conflict of Interest Policy includes the following important points:

- Each employee has the responsibility at all times to be loyal to Seedco and to promote Seedco's best interests. To this end, each employee should avoid conflicts of interest or the appearance of conflicts of interest.
- A conflict of interest occurs when employees permit the possibility of gain to themselves or their immediate families to influence their judgment in acting on behalf of Seedco. An action may constitute a conflict of interest without being in violation of any laws, rules, or regulations.
- Employees should not engage in activity with or provide gifts or favors to any person or organization where they might tend, in any way, to influence objective judgment concerning Seedco policies or procedures. Similarly, employees should not accept gratuities or gifts valued in excess of a minimal value (about \$25) from other companies or individuals who do business with Seedco or seek to do business with Seedco.
- This duty of loyalty means that employees must raise concerns when they become aware that a Seedco consultant or contractor has a conflict of interest or apparent conflict of interest that would violate this policy if that consultant or contractor were an employee. Such conflicts may arise when the consultant or contractor markets services to clients outside the scope of services agreed to by Seedco or encourages Seedco to serve a client in which the consultant/contractor or the consultant/contractor's family member has a financial interest.

Separation of Personal Opinions from the Organization's Positions

When formally or informally expressing personal opinions to outside groups or individuals, either orally or in writing, employees should avoid the implication that they represent an official Seedco position or are endorsed by Seedco, unless the employee has been authorized to do so. Prior to any public activity, employees should seek guidance from their manager or Human Resources to ensure that a conflict of interest does not exist.