

## Compliance

The Syngenta Code of Conduct sets out clear standards of ethical, environmental and social responsibility that all employees must adhere to in everything they do. The Code, together with supporting policies on specific issues, helps to minimize risks to our business and ensures we comply with local and national regulations in each market we operate in.

Our Global Compliance Officer collaborates with a cross-functional working group – comprised of representatives from legal, financial compliance, risk management, corporate responsibility, security and health, safety and environment (HSE) – to develop consistent policies and guidelines as well as the tools to ensure these are implemented. A network of regional compliance functions are responsible for the implementation of these policies locally, monitoring and reporting on key business processes.

Our commitment to uphold human rights is an important part of the Code of Conduct. We extend this requirement to our suppliers and conduct assessments to monitor compliance.

We recognize the value of expert opinion and consultation, and engage in dialogue with external experts on worker and human rights. These consultations provide valuable input as we develop our codes and guidelines. We consult annually with labor representatives about employment conditions and salaries. We are members of the Fair Labor Association and we continue to work closely with them to conduct audits and stakeholder consultations to improve working conditions in our seed supply chain.

## Corporate conduct

Syngenta aims to uphold the highest standards of corporate conduct, and establishes its commitments and expectations through the global Code of Conduct. The Code provides a set of principles that all our employees must follow regarding our commitment to ethical, social and environmental responsibility, including human rights and fair labor practices.

Building awareness of the Code of Conduct is critical to embedding its principles into our corporate culture. Every new employee receives a personal copy of the Code when they join the company. In 2010, we continued the roll-out of our Code of Conduct through online and face-to-face training. In 2011 we will extend the training to include our external employees and contractors. We encourage employees to speak up and report potential violations of the Code of Conduct, either directly to their line manager or to a member of our Legal, Compliance or Human Resources teams. Alternately, alleged violations can be reported anonymously, in certain jurisdictions confidentially, through our outsourced Compliance Helpline, which is managed by a third party and is available in 20 languages. Employees can also use the Helpline to get advice on dilemmas they may be facing.

Syngenta received 78 cases through the Compliance Helpline in 2010, up slightly from 76 in 2009. Every issue raised through this process is investigated and the final number of cases are reported to our Compliance function and reported to the Compliance and Risk Management Committee, a sub-division of the Syngenta Executive Committee.

Corporate conduct	2010	2009	2008
Cases reported through the compliance helpline	78	76	31
EAME	28%	17%	19%
NAFTA	13%	26%	19%
LATAM	5%	15%	23%
APAC	54%	42%	39%

## Supplier assessments

Syngenta aims to be a leader in ethical conduct and we expect our suppliers to uphold the same high ethical standards as we set ourselves. In 2010, we implemented our new global minimum standards for suppliers, which focus on health, safety and environmental performance, as well as labor and human rights issues. To ensure our suppliers meet these requirements, we revised our assessment process to cover these standards. Our HSEQ team assessed 70 chemical suppliers of crop protection products in China, India and Europe.

We also assessed nearly 12,400 seed supply farms in India, using the methodology developed with the Fair Labor Association (FLA). These assessments focus on health and safety, child labor, awareness of workers' rights, wages and benefits, work hours, harassment and abuse, and discrimination. In 2010 we assessed 100% of the farms supplying us seeds from the three key regions of Maharashtra, Karnataka and Gujrath in India.

The FLA conducted independent audits of 176 of our supply seed farms in 2010 in India, including farm visits, document checks, and interviews with workers and growers. Each of these audits lasted three days and was timed to coincide with peak production seasons when the risk of non-compliance is greatest. The monitoring covered farms producing watermelon, tomato, egg plant, chili, squash and sweet peppers.

In 2010, the findings of the FLA and Syngenta audits were again broadly consistent in highlighting health and safety as areas of

concern, as well as a number of cases where wages were below minimum levels. In addition, FLA detected cases of child labor, most of which were on farms of growers who are first time producers in our supply chain. In order to address this Syngenta is undertaking corrective actions targeted at strengthening the awareness program among its new growers.

Based on stakeholder consultation and the FLA code, child labor is defined as below 15 years old. According to Indian legislation child labor is defined as below 14 years old, however the minimum age for the completion of compulsory education is 15 years. Taking this into account, the FLA monitoring is conducted keeping in mind the higher standard of 15 years.

In consultation with the FLA, Syngenta develops detailed remediation plans in response to the audit findings. Records are published on the [FLA website](#)

<b>Health, Safety, Environment and Social compliance in supply</b>	<b>2010</b>	2009	2008
Number of HSEQ assessments at chemical suppliers	<b>70</b>	65	59
Number of seed supply farms included in Syngenta/FLA monitoring	<b>12,395</b>	8,169	2,312

## Animals in research

Syngenta aims to reduce animal testing in our research and we seek to use alternatives wherever possible. However, animal testing is legally required in many countries and in some industries to ensure the safety of our customers and the environment.

Where animals are used in our research, we set high standards for animal care. To ensure these standards are consistently applied, we audit compliance at our sites and those of major contractors. In 2010, we conducted six audits and found no instances of non-compliance.

Syngenta supports the UK National Center for the Replacement, Refinement and Reduction of Animals in Research (NC3Rs), and chairs the Center's Regulatory Toxicology Forum.

<b>Animal welfare</b>	<b>2010</b>	2009	2008
Number of audits performed in contract laboratories	<b>6</b>	3	6
Number of instances of non-compliance found	<b>0</b>	0	0

## Environmental compliance

Our robust health, safety and environment (HSE) management systems ensure that we comply with all environmental regulations. One of the main risks of non-compliance with environmental regulations is the risk of an unplanned release from our chemical manufacturing activities. This can result in off-site environmental impacts and formal complaints from neighbors or regulators. There were no unplanned releases from any of our sites in 2010.

<b>Environmental compliance</b>	<b>2010</b>	2009	2008
Significant unplanned releases	<b>0</b>	0	2