

ANTITRUST COMPLIANCE POLICY OF SEED INNOVATION AND PROTECTION INITIATIVE ASIA PACIFIC LTD.

The **Seed Innovation and Protection Initiative Asia Pacific Ltd** (hereinafter referred to as "**SIPI**") is firmly committed to complying with all applicable federal, state, and international antitrust and competition laws. The purpose of this policy is to ensure that all activities, including meetings, events, and communications, are conducted legally and ethically, fostering fair competition within the seed industry.

All members, directors, officers, employees, and participants in **SIPI** activities are required to be familiar with and strictly adhere to this policy.

I. General Principle

It is the unequivocal policy of **SIPI** to compete fairly and lawfully. The Association provides a forum for members to address common industry issues and advocate for the industry as a whole, but it is not a mechanism for members to coordinate competitive activities.

Any agreement, understanding, or even informal conversation among competitors that might restrain trade is **STRICTLY PROHIBITED**.

II. Prohibited Activities and Discussions (The "Don'ts")

Participants in any **SIPI** activity must NOT discuss, agree upon, or exchange information concerning the following competitively sensitive topics:

- **Pricing and Terms of Sale:** Do NOT discuss current or future prices, price changes, discounts, rebates, credit terms, freight charges, profit margins, pricing policies, or proprietary cost information.
 - **Market Allocation:** Do NOT agree to allocate or divide markets, territories, customers, or suppliers.
 - **Production and Supply:** Do NOT agree to limit or control production levels, product quality, new product introductions, or capacity.
 - **Boycotts and Refusals to Deal:** Do NOT agree to boycott, blackball, or collectively refuse to buy from, sell to, or deal with any supplier, customer, or competitor.
 - **Confidential Information:** Do NOT share any company-specific, non-public, or proprietary business data.
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III. Permissible Activities (The "Do's")

SIPI encourages active participation in lawful and pro-competitive activities, such as:

- Advocating for the seed industry on legislative and regulatory matters.
- Developing and promoting voluntary, non-competitive standards (e.g., seed quality testing, labelling standards etc).
- Conducting general discussions on public domain industry trends, economic outlooks, and market conditions (using only publicly available data).

- Collecting and disseminating aggregated statistical data through an independent third party, ensuring no individual company's data is identifiable.
 - Engaging in lawful collaborative research and development efforts, provided they comply with specific antitrust guidelines reviewed by legal counsel.
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IV. Meeting Procedures and Compliance

To ensure meetings remain compliant, the following procedures are mandatory for all **SIPI** meetings, conferences, and events:

1. **Agendas:** All meetings must operate with a prepared, written agenda distributed in advance. Discussions must strictly adhere to this agenda.
 2. **Minutes:** Accurate minutes must be taken and approved at the following meeting.
 3. **Legal Counsel:** SIPI encourages the presence of legal counsel at all official meetings, especially those touching upon sensitive industry topics.
 4. **Member's Responsibility:** Every participant is personally responsible for adhering to this policy. If any discussion drifts into a prohibited area, you must:
 - a. Immediately voice an objection;
 - b. Ask that the discussion revert to the approved agenda; and
 - c. If the discussion continues, you must immediately leave the meeting and ensure your departure is noted in the minutes.
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V. Consequences of Violation

Antitrust violations carry severe penalties for both **SIPI** and the individuals involved, including significant corporate fines, civil lawsuits (treble damages), substantial individual fines, and even imprisonment.

Any member or participant who violates this policy will be subject to immediate disciplinary action by **SIPI's** Board, which may include suspension or termination of membership.