

## Global Corporate Policy

### Statement of Global Customs and Import Policy

|                                 |   |
|---------------------------------|---|
| <b>Policy Ownership</b>         | Global Trade Compliance – St. Louis, Missouri USA |
| <b>Effective Date</b>           | January 17, 2012                                  |
| <b>Audience</b>                 | All Global Operations                             |
| <b>Policy No. &amp; Version</b> | CORP010   |
| <b>Supersedes</b>               | New   |

#### 1... Governance

- 1.1. Monsanto Company (“Monsanto” or “Company”) will manage all international trade with direct supervision, control and reasonable care to ensure compliance with all U.S. trade and anti-corruption laws, regulations and policies and, where not contradictory to U.S. law, the relevant local regulations of the countries in which Monsanto is doing business.

#### 2... Purpose

- 2.1. Monsanto is committed to the implementation and maintenance of a robust Global Customs and Import Compliance Program. The Customs and Import Compliance Program will be supported by operating procedures and practices necessary to ensure compliance with global Customs and import laws and regulations. Customs and import laws and regulations safeguard a country’s domestic industries, homeland security, and trading rights, while also preventing prohibited items from entering that country.

#### 3... Scope

- 3.1. This policy applies to all regular and contract employees worldwide. All divisions, businesses, subsidiaries, majority-owned joint ventures, branch offices and other Monsanto controlled entities wherever located must operate in compliance with this policy. For joint ventures in which Monsanto holds a minority interest, the Company will make a good faith effort to influence the joint venture to adopt and implement appropriate trade control policies and procedures.

#### 4... Policy

- 4.1. Where not contradictory to U.S. law, it is Monsanto’s policy to fully comply with the applicable customs and import laws, regulations and policies of all countries in which the Company does business. Monsanto recognizes that the United States Government and the governments of other countries in which the Company operates have laws, regulations, and policies, which control the import of products.

- 4.2. Monsanto's commitment to work with customs and import authorities around the globe to ensure compliance with all applicable laws, regulations, and policies extends from senior management to all employees involved in the movement of the Company's products and technology. To this end, Monsanto Company has established a Global Customs and Import Compliance Program that is based on the implementation, maintenance and continuous improvement of global operating procedures, employee training programs and periodic internal reviews designed to ensure that the Company is acting in accordance with all applicable customs and import requirements.
- 4.3. All employees are required to contact Monsanto's Legal Department or Global Trade and Compliance Department regarding any import-related questions, government inquiries or potential violations of this policy.

### **5... Commitments**

- 5.1. Monsanto will maintain and update its Global Customs and Import Compliance Program to ensure that the Company's activities are in full compliance with all applicable customs and import laws, regulations, and policies. As part of this program, Monsanto will designate certain employees to assume the authority and responsibility for supporting day-to-day customs and import compliance issues.
- 5.2. Monsanto will determine the correct tariff classification, value, and country of origin of all of its imports.
- 5.3. Monsanto will ensure that its employees have sufficient training and resources to carry out their customs and import related responsibilities, including the requirement to maintain proper documentation. At a minimum, such documentation must be complete, accurate, and contain sufficient detailed information to establish that Monsanto exercised reasonable care.
- 5.4. Monsanto will conduct periodic reviews of its Customs and Import Compliance Program to ensure that the Company is complying with all applicable customs and import regulations. If program deficiencies are found, appropriate action will be taken by the Company to correct such deficiencies.