

ZYMERGEN INC.
CODE OF ETHICS FOR CEO AND SENIOR FINANCIAL
OFFICERS

Adopted April 21, 2021

Zymergen Inc. (the “**Company**”) has a Code of Business Conduct and Ethics (the “**Code of Conduct**”) that applies to all directors, officers and employees of the Company. The Chief Executive Officer (the “**CEO**”) and all senior financial officers, including the Principal Financial Officer and principal accounting officer, are expected to engage in ethical conduct, avoid conflicts of interest, comply with specific company policies and comply with applicable law. In addition to the Code of Conduct and other associated policies, the CEO and senior financial officers are subject to the following additional specific policies:

1. The CEO and all senior financial officers are responsible for full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission as well as in other public communications made by the Company. Accordingly, it is the responsibility of the CEO and each senior financial officer to promptly bring to the attention of the Chief Legal Officer any material information of which they may become aware that affects the disclosures made by the Company in its public filings and communications.
2. The CEO and each senior financial officer shall promptly bring to the attention of the Chief Legal Officer and the Audit Committee any information they may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company’s ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company’s financial reporting, disclosures or internal controls.
3. The CEO and each senior financial officer shall act with honesty and integrity in the performance of their duties at the Company, shall comply with laws, rules and regulations of federal, state and local governments and other private and public regulatory agencies that affect the conduct of the Company’s business and the Company’s financial reporting.
4. The CEO and each senior financial officer shall promptly bring to the attention of the Chief Legal Officer and the Audit Committee any information they may have concerning any violation of the Code of Conduct, including any actual or apparent conflicts of interest between personal and professional relationships, involving any management or other employees who have a significant role in the Company’s financial reporting, disclosures or internal controls.
5. The CEO and each senior financial officer shall promptly bring to the attention of the Chief Legal Officer and Audit Committee any information they may have concerning

evidence of a material violation of the securities or other laws, rules or regulations applicable to the Company and the operation of its business, by the Company or any agent thereof.

6. The Board of Directors shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of the Code of Conduct or of these additional procedures by the CEO and the Company's senior financial officers. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code of Conduct and to these additional procedures, and may include written notices to the individual involved that the Board of Directors has determined that there has been a violation, censure by the Board of Directors, demotion or re-assignment of the individual involved, suspension with or without pay or benefits (as determined by the Board of Directors) and termination of the individual's employment.

In determining what action is appropriate in a particular case, the Board of Directors or such designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past.