

**TWIST BIOSCIENCE CORPORATION  
CODE OF BUSINESS CONDUCT AND ETHICS**

**I. Introduction**

All directors, employees and contractors (individually, a “Twist Worker” and collectively, “Twist Workers”) of Twist Bioscience Corporation (“Twist,” or the “Company”) and its subsidiaries are expected to comply with this policy, unless otherwise indicated.

**II Policy**

**1. General Statement**

Twist Workers should comply with both the letter and spirit of all applicable laws, rules and regulations. No Twist Worker shall commit an illegal or unethical act or instruct others to do so for any reason.

**2. Company Records and Communications; Quality of Disclosures**

Twist Workers must strive to ensure that all information transmitted, both within and outside the Company, is honest and well-founded; misrepresentation of information to create a misleading business picture is not permitted. Twist Workers must never withhold or fail to communicate information that should be brought to the attention of any level of management, or intentionally falsify records, including digital copies and computer records. All Company accounts, financial reports, research reports, marketing information, sales reports, competitive bids, requests for proposals, tax returns, expense accounts, time sheets, claims and any other Company documents, including those submitted to governmental agencies, must be accurate. All entries on the Company’s books and records must represent, and not conceal, the true nature of each transaction.

Company reports and documents filed or submitted to any governmental authority (including, if applicable, the Securities and Exchange Commission, the Food and Drug Administration and the Internal Revenue Service) and any public communications shall include full, fair, accurate, timely and understandable disclosure.

**3. Conflicts of Interest**

All Twist Workers must avoid any situation that interferes with, or appears to interfere with, the independent and objective exercise of their responsibilities.

The following list describes prohibitions on behavior that may be conflicts of interest. This list is not exhaustive. A conflict may occur when (i) a Twist Worker takes an action or has an interest that may make it difficult for him or her to perform his or her work objectively and effectively, or (ii) when a Twist Worker (or his or her family members)\* receives improper personal benefits as a result of his or her position in the Company.

### Conflicts of Interest: Prohibited Behavior

- Gifts. Except as provided below, Twist Workers and members of their immediate family may not directly or indirectly solicit, accept or provide gifts, gratuities, or other items of value, including private or personal discounts, or entertainment of any other form of similar consideration, from or to any person, corporation, partnership or other entity with which the Company does business or is likely to do business.
- Twist Workers may accept such gifts or gratuities (or any series of gifts or gratuities in the aggregate) with a nominal value of \$50.00 or less or, when in the form of entertainment, \$100.00 or less; and
- Twist Workers may give such gifts or gratuities if (i) pre-approved by the chief executive officer or the senior legal officer or, in the case of executive officers, by the audit committee of the Twist Board of Directors, (ii) such gift or gratuity is in the form of entertainment with a nominal value of \$150 or less per person, unless otherwise pre-approved by the chief executive officer or the senior legal officer, or, in the case of executive officers, by the audit committee of the Twist Board of Directors.
- For the avoidance of doubt, Twist Workers are not prohibited from attending conferences or similar such events in the ordinary course of business at the invitation of entities or individuals with which Twist does or is likely to do business. If Twist Workers are going to such a conference or event as an attendee, they may not accept free travel (e.g., airfare) or lodging from such entity or individual. If Twist feels that there is a business reason for you to attend this event, Twist will pay the costs associated with attendance with approval of your manager or an executive officer of Twist. Twist Workers may, however, accept a waiver of the conference fee, if offered to encourage attendance. Twist Workers may accept meals that are included in the cost of attendance and which are provided to all other attendees. Twist Workers also may participate in reasonable after-hour leisure activities offered to all conference participants. Additionally, Twist Workers may be permitted to accept meals and entertainment offered to a limited number of individuals attending the conference, provided that the value of what is offered is reasonable in the context of the event and your attendance does not create an appearance of impropriety. Any aspect of attending a conference or similar such event that departs from the above policy requires pre-approval by the chief executive officer or the senior legal officer of Twist or, in the case of executive officers, by the audit committee of the Twist Board of Directors.

### Notwithstanding the foregoing and regardless of value

- Twist Workers may not accept or provide gifts of cash, cash equivalents (including gift certificates), stock or stock equivalents; and
- Twist Workers should decline any item offered with the intent to improperly influence a Twist Worker in the performance of his or her duties.
- Twist Workers should always inform their managers when receiving gifts or gratuities if anyone could perceive a conflict of interest, even if the Twist Worker doesn't believe the gift or gratuity would violate our guidelines.

If any question exists about whether the gift is excessive in value, then the item should be returned or submitted to Human Resources for distribution in such a way that the value rule is not violated.

In addition, Twist Workers should be sure to read and follow the Company's Anti-Corruption Policy regarding payments and gifts.

Corporate Opportunities. Twist Workers may not:

- take advantage of business opportunities that arise by using corporate property, information or position for direct or indirect personal gain;
- compete with the Company (which includes engaging in the same line of business as the Company, or any situation where the Twist Worker takes away from the Company opportunities for research and development, or sales or purchases of products, services or interests); or
- engage in any outside employment or business activities that conflict with, have the potential to conflict with, or even appear to conflict with, his or her ability to properly perform work for the Company.
- Competition with the Company. Twist Workers, and members of their immediate families, shall not knowingly have any material financial interest in any: (a) transaction to which the Company is a party; (b) corporations, partnerships or other entities with which the Company does business or is likely to do business; or (c) corporations, partnerships, or other entities that compete with the Company. Whether a financial interest is material will depend on the facts and circumstances in each case, but any financial interest that could potentially cause divided loyalty or the appearance of divided loyalty should be considered material. For example, owning 100 shares of a publicly traded company is unlikely to cause divided loyalty. However, investing a substantial portion of your savings in a competitor, supplier or customer of Twist is likely to present a conflict of interest, particularly if the Twist Worker can in any way influence the business relationship between the Company and the competitor, supplier or customer. If you have a question regarding whether a financial interest is material, you should consult with the senior legal officer of the Company.
- Employment with Customers. Twist Workers may not work for a customer of the Company without written approval from the senior legal officer of the Company.
- Loans and Guarantees. Twist Workers shall not knowingly receive a loan or guarantee of an obligation as a result of his or her position with the Company.
- Outside Directorships. A Twist Worker may not accept a position as a member of the board of directors of any competitor. A Twist Worker may not be a director of a company that supports or promotes a competitor's products or services without approval from the senior legal officer of the Company. A Twist Worker may not be a director of a supplier or customer or reseller without approval from the senior legal officer of the Company. If a Twist Worker is serving as a director of a company or other organization, and encounters any situation where the role as a director may be in conflict with the Company's interests, the Twist Worker must either withdraw from that situation or resign as a director.

#### 4. **Outside Business Contacts**

Twist Workers should only perform services, provide information, and answer questions that fall within the realm of their responsibilities.

Inquiries from the news media should be directed to the most senior Worker of the Company designated to handle public relations, unless you have received permission from the chief executive officer or chief financial officer to engage in certain outbound communications. Inquiries from stockholders and other investors in the Company should be directed to the most senior Worker of the Company designated to handle investor relations. Other inquiries regarding stock ownership or record keeping should be directed to the senior legal officer of the Company.

#### 5. **Conduct Involving Suppliers**

- **General Policy.** The Company's relationships with suppliers are of great strategic importance. Twist Workers must use common sense, good judgment and the highest standards of integrity when they deal with suppliers.
- **Choosing Suppliers.** Twist Workers are not obligated to deal with all potential suppliers, and they are not required to award the Company's business to a supplier based solely on the lowest price or the fact that the supplier is also a customer. At the same time, the Company's good reputation with suppliers depends on making choices based on the merits. Twist Workers must avoid decisions that could appear to be based on personal favoritism or other factors unrelated to the Company's best interests. Twist Workers should not establish or maintain a business relationship with any supplier if they believe that its practices violate any laws.

#### 6. **International Business Laws.**

Twist Workers are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where the Company otherwise does business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. In addition, the Company expects Workers to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S.

These U.S. laws, rules and regulations, which extend to any activities outside the U.S. include:

- The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving or offering anything of value to a government official to obtain or retain business or favorable treatment, and requires the maintenance of accurate books of account, with all Company transactions being properly recorded, and which is covered in more detail in the Company's Anti-Corruption Policy;

- U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from doing business with, or traveling to, countries subject to sanctions imposed by the U.S. government (including Iran, North Korea, Sudan and Syria), as well as specific companies and individuals identified on lists published by the U.S. Treasury Department;
- U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibits transfers of U.S.-origin items to denied persons and entities; and
- Anti-boycott Regulations which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

Trade compliance is covered in more detail in the Company's Trade Controls Compliance Manual.

If a Twist Worker has a question as to whether an activity is restricted or prohibited, seek assistance before taking any action, including giving any verbal assurances that might be regulated by international laws. Twist Workers are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where the Company otherwise does business, including

#### 7. **Government Inquiries, Investigations and Lawsuits**

Twist Workers must immediately contact the chief executive officer or the senior legal officer of the Company in the situations set forth below:

- If he or she obtains any knowledge that would lead to a belief that a government investigation, inquiry or lawsuit is underway or imminent.
- Any time any government investigator wants to ask questions about individual activities, whether the questions are asked on or off Company property.
- Any time anyone receives a government inquiry through a written subpoena or written request for information, such request should immediately be submitted to the general counsel.

#### 8. **Community and Professional Organizations**

Twist supports and encourages Twist Workers to participate in community activities and professional organizations in a responsible manner that will reflect favorably upon the Twist Worker and the Company. Before accepting any position with a community or professional organization, Twist Workers should evaluate carefully whether the position could cause, or even appear to cause, a conflict of interest.

#### 9. **Political Contributions and Activities**

Any political contributions made by or on behalf of the Company and any solicitations for political contributions of any kind must be lawful and in compliance with Company policies.

This policy applies solely to the use of Company assets and is not intended to discourage or prevent individual Twist Workers from making political contributions or engaging in political activities on their own behalf. No one may be reimbursed directly or indirectly by the Company for personal political contributions.

10. **Loans and Gifts of Company Goods**

No Twist Worker, without prior approval by the appropriate supervisor, manager, or officer, may offer Company property, loans, contributions or unpaid services to a member of the public, or to any employee or agent of another Company or governmental entity. Bribes, kickbacks or illegal political contributions are expressly forbidden. The Company shall not extend or maintain credit, arrange for the extension of credit, or renew credit in the form of a personal loan to or for any director or officer of the Company. Please refer to the Company's Anti-Corruption Policy regarding payments and gifts and transactions with governmental entities.

11. **Protection and Proper Use of Company Assets**

Twist Workers shall protect Company assets and comply with internal controls to safeguard Company assets against damage or loss from unauthorized use or disposition. Any suspected loss, misuse or theft should be reported to the chief financial officer of the Company. Twist Workers may not use Company assets (including equipment, material, supplies, contractors or personnel) for personal gain and must use Company property only to conduct Company business.

All laptops, portable computers and mobile devices acquired for or used on behalf of the Company shall be considered Company property. Each Twist Worker issued a laptop or mobile device is responsible for the security of that laptop or mobile device, including the information stored in the laptop or mobile device, regardless of whether the laptop or mobile device is used in the office, at the Twist Worker's place or residence, or in any other location such as a hotel, conference room, car or airport. The loss of a laptop computer or mobile device must be reported immediately to the Company's IT department.

12. **Public Company Reporting**

As a public company, it is of critical importance that the Company's filings with the Securities and Exchange Commission and other public agencies and bodies be full, fair, accurate, timely and understandable. Depending on their respective positions with the Company, employees, officers or directors may be called upon to provide information necessary to assure that the Company's public reports meet these requirements. The Company expects employees, officers and directors to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to the Company's public disclosure requirements.

13. **Trading on Inside Information**

Under the federal securities laws, Twist Workers may not sell or purchase, or otherwise transact in Company securities if he or she is in possession of material non-public information. Twist Workers should refer to the Company's Insider Trading Policy for additional information.

14. **Protection of Confidential and Proprietary Information**

Confidential and Proprietary Information

Twist Workers shall protect and maintain confidential and proprietary information in strict confidence, except when disclosure is authorized by the Company or required by law. The use or disclosure of this information is for Company purposes only and not for personal benefit or for the benefit of others. To preserve confidentiality, disclosure and discussion of proprietary or competitive information should be limited to those Twist Workers who have a need to know the information.

Confidential and proprietary information includes, but is not limited to:

- all non-public information that might be useful to competitors or that could be harmful to the Company or its customers or vendors if disclosed;
- intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, research and new product plans, objectives and strategies, records, databases, salary and benefits data, Twist Worker medical information, customer, employee and suppliers lists and any unpublished financial or pricing information; and
- information concerning Twist Workers, stockholders or regulatory processes and status with respect to the Company's products.

Twist Workers shall respect the property rights and protect the proprietary information of other companies.

Copyright and Intellectual Property

Every Twist Worker shall respect copyright and intellectual property laws and shall observe the terms and conditions of any license agreements to which the Company has agreed. This means that Twist Workers do not have a personal right to copyrighted or other protected materials, including computer software that is licensed. Intellectual property laws and Company policy also prohibit individuals from using or reproducing, for personal purposes, certain programs or materials they use at work.

The obligation to protect and hold confident all confidential and proprietary information shall survive termination of employment or service. Upon their termination of employment or service, all Twist Workers will return confidential and proprietary information to the Company.

15. **Fair Dealing**

Each Twist Worker should endeavor to deal fairly with customers, business partners, competitors, the public and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

16. **Equal Opportunity; Discrimination or Harassment**

The Company provides equal opportunity in employment to all Twist Workers and applicants for employment. Equal opportunity rights are applicable to recruitment, hire, employment and employment-related decisions (including, but not limited to, hiring, firing, layoffs, assignments, transfers, promotions, wage/salary adjustments, and/or bonuses). The Company prohibits discrimination on the basis of race, creed, color, religion, national origin, physical or mental disability, sex, age, veteran status, sexual orientation, or other legally protected status.

The Company strives to promote an atmosphere free from verbal or physical harassment or discrimination. This includes any unwelcome comment regarding race, color, religion, sexual orientation or other characteristic protected by applicable law. The Company supports open communication to resolve questions, concerns or complaints involving discrimination or harassment. If a Twist Worker experiences or is aware of any discrimination or harassment they should contact a supervisor.

17. **Responsibility for Compliance**

Every Twist Worker is responsible for compliance with the standards outlined in this Code. Managers and supervisors should maintain an open-door policy regarding this Code.

18. **Reporting of Any Illegal or Unethical Behavior**

Twist Workers should report concerns as follows:

- Report matters relating to accounting, auditing or internal controls to the chief financial officer of the Company.
- Report other matters to the most senior Twist Worker of the Company designated to handle human resources.
- Managers to whom Twist Workers raise concerns should report those concerns to the chief financial officer of the Company.

Twist workers should review the Company's Policies and Procedures for Reporting Complaints Regarding Accounting, Internal Accounting Controls, Fraud or Auditing Matters for additional information on reporting violations.

The chief executive officer and the senior legal officer of the Company will have primary authority and responsibility for the enforcement of this Code, subject to the supervision of the Audit Committee of the Board of Directors, and the Company will devote the necessary



resources to enable the chief executive officer and the staff of the chief executive officer to establish such procedures as may be reasonably necessary to create a culture of accountability and facilitate compliance with the Code. Questions concerning this Code should be directed to the chief financial officer or senior legal officer of the Company.

Any person with behavior to report can call 1-866-203-1642. Employees who call this number need not leave their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from any employee call in a manner that protects the confidentiality and anonymity of the employee making the call. You may also submit a written report at the following address:

Twist Bioscience Corporation  
455 Mission Bay Boulevard South  
San Francisco CA 94158  
Attn: Legal Department

19. **Policy of Non-Retaliation**

Twist Workers who submit, in good faith, any concern or report of a violation or suspected violation of the Code, should do so without fear of retaliation. If any Twist Worker believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company or its agents for expressing a concern or reporting a violation or potential violation of the Code, he or she may file a complaint with the senior legal officer. If it is determined that such Twist Worker has experienced any improper employment action in violation of the Code, the Company shall promptly take corrective action. However, Twist Workers who file reports or provide information which they know to be false, or without reasonable belief in the truth and accuracy of such information, will not be protected by the above policy statement and may be subject to disciplinary action up to and including termination of employment.

20. **Failure to Comply**

Any Twist Worker who violates this policy is subject to disciplinary action, up to and including suspension or termination. The Company is entitled to report to the appropriate authorities any violations of this Code that involve illegal behavior.

21. **Waivers and Amendments**

- Waivers of the provisions in this Code for officers or directors may only be granted by the Board of Directors and may require public disclosure.
- Waivers of this Code for other Twist Workers may only be granted by the chief executive officer of the Company.
- Amendments to this Code must be approved by the Board of Directors and any such amendments applicable to the chief executive officer and the senior financial officers (including the chief financial officer and any other senior financial Twist Workers designated by the Audit Committee) may require prompt public disclosure.

### **III    Certification**

On an annual basis, each Twist Worker shall certify in writing, in the form requested, that he or she has read this Code as well as all other applicable Company policies made available to Twist Workers on the Company intranet or otherwise and will adhere to the provisions of this Code and such other Company policies.

**No written policy or guidelines can be all-inclusive, and responsibility for proper conduct rests with Twist Workers. There is no substitute for personal integrity and good judgment.**

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### **WHERE TO GO FOR ADDITIONAL INFORMATION AND HELP**

In a complex world, the right course of business conduct is not always clear. The best way to protect yourself and the Company if you have any doubts about what is considered proper business conduct is to ask before you act. If you have questions about whether what you are about to do is ethical or legal, discussing the matter with your supervisor or manager is a good place to start. If you have additional questions or need more information, please contact directly:

Paula Green - VP of Human Resources

Mark Daniels - General Counsel and Chief Ethics and Compliance Officer

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\* A person's immediate family includes that person's spouse, parents, siblings, children, parents-in-law, sons-in-law, daughters-in-law, stepchildren, stepparents as well as any other individual living with that person.