

GINKGO BIOWORKS HOLDINGS, INC. CODE OF BUSINESS CONDUCT AND ETHICS

(As of September 16, 2021)

At Ginkgo, we care about how our platform is used and we also care about the users of our platform and the ecosystem in which our platform exists. These users and stakeholders include our (a) stockholders and (b) other stakeholders, including Ginkgo’s workforce, customers, suppliers, academic researchers, governments and communities, in the case of this clause (b), as may be identified or revised by the Board from time to time. The success of our business depends on the trust we establish with our various stakeholders. We gain their trust by honoring our commitments and maintaining integrity in the conduct of our business, in our personal and professional interactions and the decisions we make on a day-to-day basis.

This Code of Business Conduct and Ethics contains general guidelines for how we work. We expect everyone to operate with honesty and the highest standards of business ethics, even if those standards may not be explicitly delineated in this Code or our other corporate policies. When we say everyone, that includes everyone that works for or represents Ginkgo Bioworks Holdings, Inc., Ginkgo Bioworks, Inc. and any of their subsidiaries (we refer to these entities in this Code collectively as “Ginkgo” or the “Company”). This Code applies to all of the directors, officers, employees and contractors of Ginkgo—when we refer to “you” in this Code, this is who is included.

1. Speak Up!

If you have questions, or feel uncomfortable about a situation or have any doubts about whether this Code addresses a particular situation, we want to hear from you! This Code cannot and is not intended to address every situation. We encourage you to contact your manager for help first. If your manager cannot answer your question or if you do not feel comfortable contacting your manager, contact the General Counsel. We have also established a hotline (“EthicsPoint”) managed by a third-party service provider, NAVEX Global, that is available 24 hours a day, 7 days a week, by telephone at +1 844-408-0289 or online at www.ginkgobioworks.ethicspoint.com. You may remain anonymous and will not be required to reveal your identity using this hotline, although providing your identity may assist us in addressing your questions or concerns.

2. Reporting Violations of the Code

All employees and directors have a duty to report any known or suspected violation of this Code, including violations of the laws, rules, regulations or policies that apply to Ginkgo. If you know of or suspect a violation of this Code, immediately report the conduct to your manager

and/or submit a report through EthicsPoint as described above. If your manager believes there has been a violation of this Code, your manager will be required to report the conduct on EthicsPoint. If your concern relates specifically to any practices, procedures, or circumstances that raise concerns about the integrity of Ginkgo's financial disclosures, books, and/or records, then you should consult Ginkgo's Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud, or Auditing matters.

We safeguard our reputation and preserve our culture by requiring each of us to hold ourselves accountable. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, could result in serious consequences for both you and the Company. If you are accused of violating this Code, you may be given an opportunity to present your version of the events at issue prior to any determination of appropriate discipline. We will take appropriate steps to maintain confidentiality; however, in some cases, we cannot guarantee absolute confidentiality or anonymity. If you are found to have violated this Code, we will take appropriate action, which may range from training, to warnings, to termination of employment or other business relationship(s), among other possible actions.

3. No Retaliation

We maintain a zero-tolerance policy regarding retaliation. It is against our values and the law to retaliate against any director, officer, consultant, or employee who in good faith reports a known or suspected violation of this Code. An employee who retaliates against someone who has reported a known or suspected violation of this Code is subject to discipline up to and including termination of employment. Good faith reporters can be assured that they will not face adverse employment consequences, discrimination, harassment, or threats. A reporter who believes that she or he is being retaliated against should contact our Chief People Officer or our General Counsel.

4. Conflicts of Interest

a) Identifying Potential Conflicts of Interest

We recognize and respect your right to engage in outside activities that you deem proper and desirable, provided that these activities do not impair or interfere with the performance of your duties to Ginkgo or your ability to act in Ginkgo's best interests. In most, if not all, cases, this will mean that you must avoid situations that present a potential or actual conflict between your personal or business interests and Ginkgo's interests.

A conflict of interest occurs when your personal or business interest interferes (or appears to interfere) with the interests of the Company, which for example may involve time commitments working for other companies or organizations that are inconsistent with the time commitments that we expect you to devote to Ginkgo. A conflict of interest can arise whenever you, as an employee, officer, director or contractor, take action or have an interest that prevents you from

performing your Company duties and responsibilities honestly, objectively, and effectively. Each individual's situation is different and in evaluating whether your own situation involves a conflict of interest, you may have to consider many factors.

Identifying potential conflicts of interest may not always be clear-cut. If you believe a circumstance or situation would be reasonably expected to give rise to a conflict of interest, such circumstance or situation should be identified to the General Counsel, who will, together with senior management, make a determination of whether there is a conflict of interest that would prevent you from participating in an activity. Depending on the circumstance, a conflict of interest determination may be escalated to the Board of Directors.

b) Corporate Opportunities

As an employee, officer or director of the Company, you have an obligation to the Company to advance Ginkgo's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with Ginkgo, you should first present the business opportunity to Ginkgo. You are not permitted to use corporate property, information or your position within Ginkgo for personal gain while employed by us or, if you are a director, while serving on our Board of Directors.

You should disclose to your manager the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your manager will contact the General Counsel and the appropriate management personnel to determine whether Ginkgo wishes to pursue the business opportunity. If Ginkgo waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code.

5. Confidential Information

You have access to sensitive confidential information by virtue of your relationship with Ginkgo. Confidential information includes, without limitation, non-public information that might be of use to competitors or others, or, if disclosed, harmful to Ginkgo or its collaborators, customers or suppliers. You have a duty to safeguard all confidential information of Ginkgo or third parties with which Ginkgo conducts business, except when disclosure is legally authorized or mandated. In such a case, you should raise any questions or concerns to the General Counsel or the Head of Intellectual Property. Unauthorized disclosure of any confidential information is prohibited. Your obligation to protect confidential information continues after you leave the Company. Unauthorized disclosure of confidential information could cause competitive harm to Ginkgo or its collaborators, customers or suppliers and could result in legal liability to you and Ginkgo.

6. Competition and Fair Dealing

We value fairness in our interactions and dealings internally and externally. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. You should maintain and protect any intellectual property licensed from licensors with the same care as you employ with Ginkgo's intellectual property. You should also handle the nonpublic information of our collaborators, licensors, suppliers and customers responsibly and in accordance with our agreements with them, including information regarding their technology and product pipelines.

7. Gifts and Entertainment

The giving and receiving of gifts is a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. Gifts and entertainment, however, should not compromise, or appear to compromise, your ability to make objective and fair business decisions. In addition, it is important to note that the giving and receiving of gifts are subject to a variety of laws, rules and regulations applicable to our operations, including, without limitation, laws regarding the marketing of products, bribery and kickbacks. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If you plan to provide a business gift, the value of which exceeds a de minimis amount, please consult Ginkgo's Anti-Corruption Policy.

It is your responsibility to use good judgment in this area of gifts and entertainment. As a general rule, you may give or receive gifts to or from, or engage in entertainment with, collaborators, customers or suppliers only if the gift or entertainment is infrequent, modest, intended to further legitimate business goals, in compliance with applicable law, and provided the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. All gifts given or received on Ginkgo's behalf should be discussed with your manager, and any gifts or entertainment expenses you incur should be properly accounted for on expense reports. If you conduct business in other countries, you must be particularly careful that gifts and entertainment are not construed as bribes, kickbacks or other improper payments. See Ginkgo's Anti-Corruption Policy for a more detailed discussion of our policies regarding giving or receiving gifts related to business transactions in other countries.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your manager or the General Counsel for additional guidance.

Note: Gifts and entertainment may not be offered or exchanged under any circumstances to or with any employees of the U.S. government or state or local governments. If you have any questions about this policy, contact your manager or the General Counsel for additional guidance. Please direct questions to the Legal team at ethics@ginkgobioworks.com. For a more

detailed discussion of special considerations applicable to dealings with the U.S., state and local governments, see “Interactions with the Government.”

8. Protection and Use of Company Assets

You should be aware that Company property includes intellectual property. This intellectual property may include inventions, discoveries, results, trade secrets, or know-how. Loss, theft or misuse of our assets has a direct impact on our business and financial status. You are expected to protect Ginkgo’s assets that are entrusted to your or your designated agent and to protect Ginkgo’s assets in general. You are also expected to take steps to ensure that our assets are used only for legitimate business purposes.

Employees and other users of Company property, including equipment, software, or electronic systems should have no expectation of privacy with respect to communications and data stored in or transmitted through such property. To the extent permitted by law, Ginkgo has the ability, and reserves the right, to monitor all electronic communications. These communications may also be subject to disclosure to law enforcement or government officials.

9. Accuracy of Financial Reports and Other Public Communications

As a public company we are subject to various securities laws, regulations and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete information regarding Ginkgo’s business, financial condition and results of operations. We expect you to provide accurate, complete and timely reporting to Ginkgo as applicable to your responsibilities at Ginkgo. Please refer to Ginkgo’s Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud, or Auditing Matters for more details.

The people working in our finance department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate in all material respects, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all applicable standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

10. Compliance with Laws and Regulations

You have an obligation to comply with all laws, rules and regulations applicable to our operations. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should promptly seek advice from your manager or the General Counsel.

a) Interactions with the Government

We conduct business with a variety of governmental authorities. We are committed to conducting our business with governments and their representatives with the highest standards of business ethics and in compliance with all applicable laws and regulations, including the

special requirements that apply to communications with governmental bodies that may have regulatory authority over our products and operations, including by government contracts and in government transactions.

If your job responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to your job position, as well as with any applicable standard operating procedures that we have implemented. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your manager and the General Counsel.

In addition to the above, you must obtain approval from Ginkgo's Chief Executive Officer or General Counsel for any work activity that requires communication with any member or employee of a legislative body or with any government official or employee.¹ Work activities covered by this policy include meetings with legislators or members of their staffs or with senior executive branch officials on behalf of Ginkgo. Preparation, research and other background activities that are done in support of lobbying communication are also covered by this policy even if the communication ultimately is not made. Further, to the extent you interact with and/or retain lobbyists or individuals who make contact with government officials on Ginkgo's behalf, you must inform the General Counsel of any new arrangements and/or changes to ongoing arrangements. If any doubt exists about whether a given work activity would be considered covered by this provision, you should seek advice immediately from your manager and the General Counsel.

b) Political Contributions and Volunteer Activities

We encourage you to participate in the political process as individuals and on your own time. Federal and state contribution and lobbying laws severely limit the contributions we can make to political parties or candidates. It is our policy that our funds or assets not be used to make a political contribution to any political party or candidate, unless prior approval has been given by our Chief Executive Officer or General Counsel. We will not reimburse you for personal political contributions. When you participate in non-Ginkgo political affairs, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company. Please contact the Company's General Counsel if you have any questions about this policy. In addition, given Ginkgo's involvement at the state level, employees should notify the General Counsel of any planned donations to non-federal political candidates, political action committees, or the like.

c) Compliance with Antitrust Laws

Antitrust laws of the United States and other countries are designed to protect consumers against unfair business practices and to promote and preserve competition. Our policy is to

¹ Certain employees are authorized by the Chief Executive Officer or General Counsel to interact with government officials through a standing approval and/or project-based approval. Absent such an authorization, the general presumption is that any interactions with government officials require separate approvals.

compete vigorously and ethically while complying with all antitrust, monopoly, competition or cartel laws in all countries, states or localities in which the Company conducts business.

d) No Insider Trading

Insider trading occurs when a person buys or sells a security while having material nonpublic information. As a platform company, Ginkgo works with a large number of businesses across numerous industries. You may learn material nonpublic information about these businesses while working at Ginkgo. You may not use that information to make decisions to buy or sell securities. Additionally, you cannot advise another person to buy or sell a security based on that information. Please refer to our Insider Trading Compliance Policy for additional information, and direct any questions to the General Counsel at ethics@ginkgobioworks.com.

11. Public Communications and Regulation FD

a) Public Communications Generally

We value transparency and want to build and maintain trust with our stakeholders and the broader community. What is written or said about us in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide accurate information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. We have adopted Guidelines for Corporate Disclosure to build trust with our stakeholders and in the community, to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data.

b) Compliance with Regulation FD

In connection with our public communications, we are required to comply with a regulation under the federal securities laws referred to as Regulation FD (which stands for “fair disclosure”). Regulation FD requires that, when we disclose material nonpublic information about Ginkgo to securities market professionals or stockholders (where it is reasonably foreseeable that the stockholders will trade on the information), we must also disclose the information to the public. “Securities market professionals” generally include analysts, institutional investors and other investment advisors.

We have designated certain individuals as “spokespersons” who are responsible for communicating with analysts, institutional investors and representatives of the media. If you are not a designated spokesperson of Ginkgo, you should not communicate information about Ginkgo to analysts, institutional investors or representatives of the media, except at the request of our designated spokespersons.

For more information on the Company's policies and procedures regarding public communications and Regulation FD, please contact the General Counsel for a copy of the Company's Policy Statement – Guidelines for Corporate Disclosure or with any questions you may have about disclosure matters.

12. Anti-Bribery and Anti-Corruption

The Company is committed to complying with the U.S. Foreign Corrupt Practices Act (the "FCPA") and other applicable anti-corruption laws. Consequently, the Code incorporates Ginkgo's Anti-Corruption Policy, which you should consult for further information. For further guidance, please contact Ginkgo's General Counsel.

13. International Trade Laws

The United States and many other countries have laws that restrict or otherwise require licensing for the export or import of certain goods and services to other countries or to certain parties. U.S. laws and regulations also impose various trade sanctions or embargoes against other countries or persons, and prohibit cooperation with certain boycotts imposed by some countries against others. We do not participate in prohibited boycotts. The Code incorporates Ginkgo's Trade Controls Compliance Policy, which should be consulted for further guidance.

The scope of these licensing requirements, trade sanctions, and trade embargoes may vary from country to country. They may range from specific prohibitions on trade of a given item to a total prohibition of all commercial transactions. It is important to note that Ginkgo may not facilitate or encourage a non-domestic company to perform a transaction that it could not perform itself pursuant to sanctions laws.

If you are involved in export transactions or international operations, you must familiarize yourself with the list of countries against which the United States maintains comprehensive sanctions and the rules relating to exporting to or transacting with such countries, either directly or indirectly through foreign subsidiaries or other third parties. Due to the complexities of these international trade laws, contact ethics@ginkgobioworks.com before exporting or importing goods or services, or engaging in transactions, with countries or persons that may be affected by economic or trade sanctions. If requested to participate in or cooperate with an international boycott, immediately report this request to the General Counsel.

14. Environment, Health and Safety

We are committed to providing a safe and healthy working environment and to avoiding adverse impact and injury to the environment and the communities in which we do business. You must comply with all applicable environmental, health and safety laws, regulations and Company standards. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. You should contact EHS@ginkgobioworks.com if you have any questions about the environmental, health and safety laws, regulations and policies that

apply to you. Please report any concerns to EthicsPoint, a hotline managed by our third-party service provider, NAVEX Global, that is available 24 hours a day, 7 days a week, by telephone at +1 844-408-0289 or online at www.ginkgobioworks.ethicspoint.com and follow the relevant prompts for further instructions.

15. Employment Practices

We pursue fair employment practices in every aspect of our business. The following is only intended to be a summary of certain of our employment policies and procedures. Copies of the Company's detailed policies are available on our internal website. Company employees must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association and privacy. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. Failure to comply with labor and employment laws can result in civil and criminal liability against you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the Company's General Counsel if you have any questions about the laws, regulations and policies that apply to you.

16. Harassment and Discrimination

We strictly prohibit and do not tolerate discrimination against employees, directors, officers, contractors, or applicants on the basis of race, color, religion, creed, national origin or ancestry, ethnicity, sex, gender (including gender nonconformity, status as a transgender individual, and gender identity), pregnancy and pregnancy-related conditions (including breastfeeding), sexual orientation, age (assuming a legal age for employment purposes), physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, or any other characteristic protected under applicable federal, state, or local law. You are prohibited from engaging in unlawful discrimination.

Ginkgo also prohibits harassment, whether physical or verbal, and whether committed by managers, non-supervisory personnel or non-employees. Please refer to our Anti-Harassment Policy for further details.

17. Conclusion

This Code contains general guidelines for conducting business consistent with the highest standards of business ethics. Policies referenced in this document are incorporated into this Code by reference. If you have any questions about these guidelines or policies, please contact your manager or the General Counsel. We expect all of the directors, officers, employees and contractors of Ginkgo to adhere to this Code.

This Code, as applied to Ginkgo's principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, shall be

deemed our “code of ethics” within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing policy. We reserve the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

Any waiver of this Code for our directors, executive officers or other principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions may be made only by our Board of Directors and will be disclosed to the public as required by law or the rules of the New York Stock Exchange, when applicable. Waivers of this Code for other employees may be made only by our Chief Executive Officer or General Counsel and will be reported to our Audit Committee.

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