



Code of Conduct and Ethics

Introduction

Purpose of Our Code

At Benson Hill, we value doing the right thing with integrity, transparency, and the highest ethical standards. We are guided by our core values: Be Bold, Be Inspired, and Be Real. But our core values alone cannot guide all our actions. Our Code of Conduct and Ethics (the “Code”)—alongside our policies, procedures, and the law—exists to help guide our actions.

The Code is our guidebook for how we act with integrity, transparency and the highest ethical standards. It sets a clear standard of conduct that we expect all our people and those acting on our behalf to follow.

Oversight and Administration

Our Code has been approved by our board of directors (the “Board”). The overall administration of our Code is handled by our Chief Legal Officer. The day-to-day administration of the Code is managed by our local management teams and human resource team.

Applicability of the Code

Our Code applies to several groups of people. Our Board members are bound by it. So are all our employees, no matter where they work or what their jobs are. We also expect contractors, consultants, trainees, temps/agency workers, interns and volunteers, whom we collectively refer to as “associates,” to follow our Code. In addition, we expect all our suppliers, consultants, law firms, agents, sales representatives, distributors, and other service providers to uphold similar standards. We aspire to do business only with third parties that have a reputation for integrity.

The number of laws and regulations around the world affecting Benson Hill increases and becomes more complex each year, particularly as we strive to grow our business. To the extent practicable, this Code will be modified to conform to changes in laws and customs. In some cases, the laws of various jurisdictions may conflict. When you encounter a conflict, you should consult with Benson Hill’s legal department to understand how to resolve any conflict. If any requirement of our Code violates or conflicts with the laws of a country, the requirement shall not apply in that country. Each of us has an important responsibility to know and follow the laws that apply wherever we work. If you have questions about the laws that apply to your work activities, contact Benson Hill’s legal department for guidance.

This Code is intended to ensure Benson Hill operates in compliance with all laws and regulations applicable to its business. As such, this Code reinforces the Benson Hill’s and our employees’ and

associates' existing obligations under the law and is not intended to create any additional obligations on the part of Benson Hill.

Failure to comply with this Code may subject employees to discipline, up to and including termination. Failure of an associate to comply with the Code, where applicable, may be considered grounds to modify or terminate our relationship with them. Please note that our Code is not a contract. Benson Hill has the right to amend, modify or revise this Code at any time with or without notice to Benson Hill employees or Benson Hill's associates.

After carefully reviewing this Code, you must sign an acknowledgement attached as Exhibit A hereto, indicating that you have received, read, understand and agree to comply with this Code. The acknowledgment must be signed within ten business days of your receipt of this Code.

Statement of Our Core Values

Company Vision

Benson Hill endeavors to build a healthier and happier world by unlocking nature's genetic diversity with the leading food innovation engine. By leading the pace of innovation in the food system, Benson Hill will catalyze and broadly empower innovation from plant to plate so great-tasting, healthy, and sustainable food choices are available to everyone.

Core Values

Our Core Values are a set of common principles we share that are fundamental to Benson Hill's identity. Living by our Core Values promotes clarity of expectations, alignment on direction, and commitment to ourselves and our community.



Be Bold!

We redefine boundaries by providing new solutions to difficult problems. Together we are driven to transform the future and will not allow the fear of failure to prevent us from innovating. We voice our opinions, embrace change, and challenge each other to think creatively.



Be Inspired!

We have purpose in our work—we are curious, engaged, and have fun. We maintain an active learning mindset and are motivated by diverse people and thoughts. We are energized by all innovators and together we aim to make an impact and contribute to building a better world.



Be Real!

We understand who we are, what we want to achieve, and what it takes to get there. We hold each other accountable through timely, candid, and well-intentioned feedback. Together we engage in honest communication and healthy debate that leads to success through true alignment.

Reporting and Non-Retaliation

Reporting

Benson Hill cannot live up to its commitment to act with integrity if we, as individuals, do not speak up when we should. That is why, in addition to knowing the legal and ethical responsibilities that apply to your job, you should speak up if you:

- are unsure about the proper course of action and you need advice;
- believe that someone acting on behalf of Benson Hill is doing, or may be about to do, or is contemplating doing, something that violates the law, this Code, or other ethical standards; or
- believe that you or any other employee or associate may have been involved in misconduct.

You are encouraged to direct questions about our Code to your immediate supervisor or other supervisors in your immediate organization. Associates should report all violations or suspected violations of our Code to the Benson Hill Chief Legal Officer at yfunder@bensohill.com.

We take our responsibilities for compliance very seriously and encourage employees and associates to report violations or concerns. Consequently, reports of violations or potential violations of our Code may also be submitted by calling our ethics hotline, reporting the incident to our ethics hotline via email, or utilizing the ethics hotline on-line portal, as managed by an outside third-party vendor, or by following the instructions for reporting a violation through the ethics hotline website. Because the manner in which reports of violations or suspected violations varies from country to country, you may also contact the ethics hotline for guidance on matters to report, to whom to report and how such matters may be reported.

Report an Incident to the Ethics Hotline at:

Email: absolute@integritycounts.ca

Phone: North America Toll Free 1-866-921-6714

Online: www.integritycounts.ca/org/bensonhill

Reports made through the ethics hotline may be made anonymously or by identifying oneself, as permissible. Because it may be more difficult to thoroughly investigate reports that are made anonymously, you are encouraged to share your identity when reporting rather than doing so anonymously.



Employee and associate reports of Code violations or potential violations should be made in good faith, based on the reasonable belief of the reporting person, and will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, take appropriate remedial action, or comply with applicable law. Reports of violations or potential violations should supply detailed information to allow us to investigate and address the concern. We will look favorably on good faith reporting by employees and associates in accordance with the Code.

All employees and associates will be held accountable for adherence to this Code. It is company policy that any employee who violates this Code will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation. Employees who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. Benson Hill may also face substantial fines and penalties and many incur damage to its reputation and standing in the community. Your conduct as a representative of Benson Hill, if it does not comply with the law or with this Code, can result in serious consequences for both you and Benson Hill.

Non-Retaliation

Benson Hill understands that reporting actual or suspected misconduct is not always easy. Any employee or associate who, in good faith, lawfully and truthfully, seeks advice, raises a concern or reports misconduct, is following this Code. Benson Hill will not tolerate retaliation against that person.

We maintain a firm commitment to non-retaliation. Individuals engaging in retaliatory conduct will be subject to disciplinary action, up to and including termination of employment. If you suspect that you or someone you know has been retaliated against for raising a good faith compliance or integrity issue, you should immediately contact the Benson Hill Chief Legal Officer at yfundler@bensonhill.com. Allegations of retaliation will be investigated and appropriate action will be taken.

Waivers of the Code

Waivers of this Code for employees who are not directors, executive officers or other principal financial officers may be made only by Benson Hill's Chief Legal Officer. Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by our Board or the appropriate committee of our Board and will be promptly disclosed to the public as required by law or regulation of the Securities and Exchange Commission ("SEC") or the rules of the New York Stock Exchange.



Our Commitment to Our People

Diversity, Equity, and Inclusion

We understand and appreciate the value that diversity contributes to Benson Hill and to the communities in which we live and work. We embrace all the ways in which we differ and strive to build an environment of fair treatment, access, opportunity and advancement. We strive to create an environment in which any individual or group can be and feel welcomed, respected, supported and valued to fully participate. All employees and associates have a responsibility to act accordingly.

Equal Opportunity Employment

Benson Hill does not unlawfully discriminate against any employee or applicant for employment because of race, color, religion, sex, national origin, ancestry, citizenship status, pregnancy, childbirth, (or related medical conditions, including, but not limited to lactation), disability, age, military status or status as a Vietnam-era or special disabled veteran, marital status, registered domestic partner or civil union status, gender (including sex stereotyping and gender identity or expression), medical condition (including, but not limited to, cancer related or HIV/AIDS related), genetic information, or sexual orientation in accordance with applicable federal, state and local laws.

Prohibition of Harassment

Benson Hill is committed to providing its employees and associates with a work environment free of any type of harassment. Benson Hill will not tolerate harassment of its employees and associates by anyone, including executives, officers, directors, managers, co-workers, vendors or customers of Benson Hill. Harassment encompasses all types of unwelcome, offensive, demeaning or intimidating conduct toward another person. Harassment can be verbal, physical, electronic or visual, and can be sexual or nonsexual in nature. Further information can also be found in the Benson Hill Employee Handbook.

Workplace Violence

Benson Hill will not tolerate any threatening or hostile behavior in the workplace. Employees and associates must not engage in any assaults, hostile physical contact or intimidation, fighting, verbal, nonverbal, or written threats of physical harm or violence while on company property, at company events, or on company business.



Drugs and Alcohol

Improper use of alcohol, illegal drugs, and other controlled substances can adversely affect job performance and create safety risks. Benson Hill employees and associates may not work or report to work while improperly impaired by alcohol, illegal drugs or any other controlled substances.

Workplace Safety

Benson Hill is committed to providing a safe and secure work environment and complying with all relevant legal requirements regarding health, safety and security. Each employee or associate is responsible for observing the safety and security rules and practices that apply to his or her job. Employees and associates are also responsible for taking precautions necessary to protect themselves and their co-workers, including immediately reporting accidents, injuries and unsafe or threatening practices or conditions. Appropriate action will be taken to correct known unsafe or threatening practices or conditions.

Our Commitment to Our Customers and Business Partners

Benson Hill is committed to the highest standards of integrity and safety in our research and development and commercialization activities. Benson Hill employees and associates are responsible for continuing our tradition of integrity and safety by upholding the highest ethical, scientific and technical standards in our research and development activities. Benson Hill believes compliance is the baseline.

Responsible Interactions with Business Partners

Benson Hill receives competitive and fair value from its suppliers and service providers by maintaining its objectivity and building relationships based on integrity and trust. As a responsible company representative, you should select suppliers and service providers that are best able to meet our business needs in terms of quality, cost, delivery and innovation. Incentives or participation in any activities that may improperly influence, or appear to influence, your business judgment should not be considered or accepted. You should be certain that personal or family relationships do not influence, or appear to influence, objective purchasing decisions.

Competitive Information

Information about competitors, customers and suppliers is a valuable asset in the highly competitive markets in which Benson Hill operates. While it is entirely appropriate for Benson Hill to gather competitive information, we must do so properly and in accordance with all



applicable legal requirements. Benson Hill can collect competitive information from public sources, published surveys and appropriate dealings with customers.

Benson Hill prohibits the misappropriation of a competitor's proprietary information, the inducement of disclosures by a competitor's past or present employees in violation of contractual commitments and any improper agreements with competitors to exchange competitive information.

Compliance with Competition Laws

Benson Hill's policy is to comply with competition laws (known as "antitrust" law in the United States) of the jurisdictions in which it does business. Competition laws help foster and preserve fair and honest competition in the market. While these laws are complex and vary from country to country, they generally prohibit competitors from working together to limit competition or control prices, among other things.

Examples of prohibited anti-competitive practices include price fixing; bid rigging, allocating customers, markets or territories; and coordinating with others to refuse to deal with a customer. If a competitor attempts to discuss any of these anticompetitive practices with you, you should communicate your disapproval, stop the conversation immediately and report the conversation to the Benson Hill legal department.

Our Commitment to Our Company and Owners

Accurate Financial Reporting

We are committed to full and accurate financial disclosure, and to maintaining our books and records in compliance with all applicable laws, rules and regulations, accounting standards, accounting controls and audit practices. Accurate information is critical to our success. Our customers must be confident that our records and statements are complete, truthful, and accurate. Accurate information is also essential to allow us to meet our legal, regulatory and contractual obligations. It is our policy to maintain accurate and complete accounting records and accurately report our financial results at all times. If you are in any way involved with maintaining our accounting records or preparing our financial statements, you must ensure that all transactions are recorded and reported in accordance with generally accepted accounting principles and comply with our accounting policies and procedures, including our established systems of internal controls.



In addition to making and keeping accurate books, records, and accounts, it is also our policy to maintain a system of internal accounting controls sufficient to provide reasonable assurances that:

- transactions are executed in accordance with management’s general or specific authorization;
- transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles, or any other criteria applicable to such statements, and to maintain accountability for assets; and
- access to assets is permitted only in accordance with management’s general or specific authorization.

We wish to encourage employees, associates and interested third-party customers, suppliers and business partners to make us aware of any practices, procedures, or circumstances that raise concerns about the integrity of our financial disclosures, books, and records.

The following is not an exhaustive list of matters that should be reported:

- fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to the SEC or the investing public;
- violations of SEC rules and regulations or any other laws applicable our financial accounting, maintenance of financial books and records, internal accounting controls and financial statement reviews or audits;
- fraud or deliberate error in the preparation, evaluation, review or audit of any of our financial statements;
- fraud or deliberate error in the accounting of, or the recording and maintaining of, our financial records;
- deficiencies in or intentional noncompliance with our internal accounting controls;
- misrepresentation or false statements regarding a matter contained in our financial records, financial reports or audit reports; and
- deviation from the full and fair reporting of our financial condition.



Creating, Maintaining, and Managing Accurate Business Records

Accurate and reliable records are critical to investors and our business managers. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our business decision-making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, emails, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business. Our business practices must be conducted with the highest standard of ethical behavior, and our transactions must be accurately and properly documented and accounted for.

Each of us must ensure that business transactions are properly reflected in our books and records and that all transactions are documented in a manner consistent with their economic substance. A strong records and information management program helps us meet legal requirements and commitments to our owners, business partners, and customers.

Our policy applies to all records. You cannot make false claims on items such as expense reports, falsify quality or safety results, record false sales or improperly record them early, understate or overstate assets or liabilities, or defer recording items that should be expensed. No entry may be made on the books and records of Benson Hill that intentionally hides or disguises the true nature of any transaction. You must follow all laws and internal Benson Hill policies regarding record retention. Contact the Benson Hill legal department if you have any questions.

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 our business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage Benson Hill and result in legal liability.

Our principal financial officers and other employees working in the accounting department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. In order to fulfill such obligation, the principal financial officers and each other employee working in the accounting department must:

- Carefully review drafts of reports and documents we are required to file with, or submit to, the SEC before they are filed, or submitted, and press releases or other public communications before they are released to the public, with particular focus on disclosures each such person does not understand or agree with and on information

known to such person that is not reflected in the report, document, press release or public communication.

- Comply with our disclosure controls and procedures as in effect from time to time, which have been designed to ensure that the information required to be disclosed by us in our SEC filings is collected, processed, summarized and disclosed in a timely fashion and accumulated and communicated to the appropriate persons.
- Promptly bring to the attention of the Chief Legal Officer or Chief Financial Officer any material information of which such person may become aware that affects the disclosures made by us in our public filings, any material information that may assist the Chief Legal Officer or Chief Financial Officer in fulfilling its responsibilities, matters that such person feels could compromise the integrity of our financial reports or disagreements on accounting matters.
- Always act with the highest standards of personal and professional integrity: do not tolerate others who attempt to deceive or evade responsibility for actions.

In addition, these employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

Proper use of company assets

We all have a responsibility to protect our assets against loss, theft and misuse. Our assets include cash, equipment, inventory and computer software, systems and other intellectual property. Our funds and property should be used only for the benefit of Benson Hill. Theft, embezzlement or misappropriation of Benson Hill's property by any employee or associate is prohibited and may be subject to criminal prosecution.

Proper use of confidential information

Benson Hill has developed and continues to develop and use commercially valuable confidential and/or proprietary technical and non-technical information. Our confidential information includes, among other things, information concerning products, personnel, medical, non-public financial data, information related to associates, agents, shareholders, borrowers, customers, vendors, internal programs or practices, technology and technical data, recipes and formulas, research and development information, including new product concepts, current and future marketing plans, commodity market positions, recipes, trading information and strategies.



Such confidential information shall be used solely by employees or associates in the performance of their job duties for Benson Hill and shall not be used in any other manner whatsoever during their employment. Employees shall not, without the prior written consent of Benson Hill, use, access, disclose, divulge, or publish to others any such confidential information acquired in the course of their employment, except when such disclosure is legally mandated. This prohibition expressly includes such information in verbal, written, visual or electronic form. Such confidential information is the exclusive property of either Benson Hill or its customers, and under no circumstances whatsoever shall employees have any rights to use, access, disclose, divulge or publish to others such confidential information following the termination of their employment, unless the Benson Hill legal department provides written authorization for an employee to disclose confidential information about Benson Hill to persons outside of Benson Hill.

An employee's obligation to protect confidential information continues after he or she leaves Benson Hill. Upon termination of employment, employees must deliver to Benson Hill immediately any and all confidential information, whether stored electronically or in paper format, including but not limited to all copies of such documents prepared or produced in connection with their employment with Benson Hill that pertain to Benson Hill's business or the employee's services for Benson Hill, whether made or compiled by the employee or furnished to the employee in connection with such services to Benson Hill. In addition, at termination, employees must return to Benson Hill all of Benson Hill non-confidential property, documents, or electronic information.

Unauthorized disclosure of confidential information could cause competitive harm to Benson Hill or its customers and could result in legal liability to you and Benson Hill. Employees who improperly use or disclose confidential information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information, as well as possible prosecution. Any questions or concerns regarding whether disclosure of Benson Hill information is legally mandated should be promptly referred to the Benson Hill legal department.

Conflicts of Interests

Benson Hill's policy on conflicts of interest is straightforward. You should act in the best interest of Benson Hill, and your business dealings on behalf of Benson Hill should not be influenced, or even appear to be influenced, by personal or family interests. To ensure that we resolve any conflicts of interest, Benson Hill employees and associates must immediately disclose any potential conflicts of interest to their leader or Benson Hill representative, then Benson Hill can take action to avoid, manage, or resolve actual and/or perceived conflicts of interest. Benson Hill directors must report any conflicts of interest to the Nominating and Corporate Governance Committee of the Board. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in "Waivers of the Code" above.

Potential conflicts of interest may include:

- accepting outside employment that is inconsistent with Benson Hill's interest;
- allowing a personal relationship to influence a business decision;
- discovering a potential business opportunity for Benson Hill during your job and using it for your own gain;
- accepting gifts or entertainment over a value of \$100 that affect—or could appear to affect—your business objectivity;
- having romantic relationships with a supervisor, subordinate, or business partner; or
- having a significant financial interest in a competitor, customer, or business partner.

Corporate Opportunities

As a Benson Hill employee, you have an obligation to advance Benson Hill's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity related to our business activities through the use of corporate property, information or because of your position with Benson Hill, you should first present the business opportunity to Benson Hill before pursuing the opportunity in your individual capacity. No employee may use corporate property, information or his or her position with Benson Hill for personal gain, nor may any employee compete with Benson Hill.

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

Fair Dealing

All employees should endeavor to deal fairly with fellow employees and with our customers, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Relationships with Customers

Our business success depends upon our ability to foster lasting customer relationships. We are committed to dealing with customers fairly, honestly and with integrity. Specifically, you should keep the following guidelines in mind when dealing with customers:

- Information we supply to customers should be accurate and complete to the best of our knowledge. Employees should not deliberately misrepresent information to customers.
- Customer entertainment should not exceed reasonable and customary business practices. Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for, customer purchase decisions.

Relationships with Suppliers

We deal fairly and honestly with our suppliers. This means that our relationships with suppliers are based on price, quality, service and reputation, among other factors. Employees or associates dealing with suppliers should carefully guard their objectivity. Specifically, no employee should accept or solicit any personal benefit from a supplier or potential supplier that might compromise, or appear to compromise, their objective assessment of the supplier's products and prices.

Relationships with Competitors

We are committed to free and open competition in the marketplace. Employees should avoid actions that would be contrary to laws governing competitive practices in the marketplace, including federal and state antitrust laws. Such actions include misappropriation and/or misuse of a competitor's confidential information or making false statements about the competitor's business and business practices. For a further discussion of appropriate and inappropriate business conduct with competitors, see "Compliance with Competition Laws" above.

Gifts and Entertainment

The giving and receiving of gifts are a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. However, gifts and entertainment should not compromise, or appear to compromise, your ability to make objective and fair business decisions.

It is your responsibility to use good judgment in this area. As a general rule, you may give or receive gifts or entertainment to or from suppliers, customers, contractors, partners or lenders

only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision and each should not exceed \$100 in value. All gifts and entertainment expenses should be properly accounted for on expense reports. The following specific examples may be helpful:

- **Meals and Entertainment:** You may occasionally accept or give meals, refreshments, or other entertainment if:
 - The items are of reasonable value;
 - The purpose of the meeting or attendance at the event is business related; and
 - The expenses would be paid by Benson Hill as a reasonable business expense if not paid for by another party.

Entertainment of reasonable value may include food and tickets for sporting and cultural events if they are generally offered to other tenants, contractors, real estate brokers/agents, partners or lenders.

- **Advertising and Promotional Materials:** You may occasionally accept or give advertising or promotional materials of nominal value.
- **Personal Gifts:** You may accept or give personal gifts of reasonable value that are related to recognized special occasions such as a graduation, promotion, new job, wedding, retirement, or a holiday. A gift is also acceptable if it is based on a family or personal relationship and unrelated to the business involved between the individuals.
- **Gifts Rewarding Service or Accomplishment:** You may accept a gift from a civic, charitable, or religious organization specifically related to your service or accomplishment.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your leader or Benson Hill representative. Your leader or Benson Hill representative will bring the gift to the attention of the Benson Hill legal department, which may require you to donate the gift to an appropriate community organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your leader or Benson Hill representative or the legal department for additional guidance.

We do not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No director, officer or employee should offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment.

Note: Gifts and entertainment may not be offered or exchanged under any circumstances to or with any employees of the U.S., state, local or foreign governments. If you have any questions about this Code, contact the Benson Hill legal department for additional guidance.

No Insider Trading or Tipping

As a publicly traded company, Benson Hill is obligated by various laws to make timely, full, fair and accurate public disclosure of information that may materially affect the market for its stock. It is against Benson Hill policy, and the law, to trade Benson Hill's stock while possessing inside information. "Inside information" is any material, non-public information a reasonable investor would consider when deciding to buy, hold, or sell stock.

Examples of inside information may include:

- forecasts, estimates or projections of earnings or results of operations for current or future periods;
- news of a pending or proposed merger, acquisition, tender offer, divestiture or disposition of significant assets;
- significant new products, services or markets;
- actual or threatened major litigation, or the resolution of such litigation;
- major events regarding securities, including the declaration of a stock split or the offering of additional securities (debt or equity);
- new major contracts, tenants, or finance sources, or the loss thereof;
- a change in management; or
- financial liquidity problems.

Additionally, employees and associates cannot pass inside information to others who could use it to trade our stock. Benson Hill employees and associates also need to keep in mind that they



are prohibited from buying or selling the stock of any other public company while in possession of inside information about that company.

If you have any questions about inside information or tipping, please consult with the Benson Hill legal department for additional information.

Public Communications and Regulation FD

Public Communications Generally

We place a high value on its credibility and reputation in the community. What is written or said about Benson Hill in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of material nonpublic information. To ensure compliance with this policy, all news media or other public requests for information regarding Benson Hill should be directed to the Authorized Spokespersons (as defined below).

Social Media

Social media includes personal email, postings on personal or public blogs, online social networking websites and other similar public communication venues (including, but not limited to, Facebook, Instagram, Twitter or LinkedIn), as well as posting to and use of video- and photo-sharing websites (including, but not limited to, youtube or flickr).

Participation in online forums is permitted when it is personal; however, employees are not authorized to act as representatives or spokespersons of Benson Hill. Employees also may not disclose, post or disseminate nonpublic, confidential Benson Hill information including, but not limited to trade secrets, customer information, financial figures, sales, intellectual property or business plans.

Compliance with Regulation FD

In connection with its public communications, we are required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for “fair disclosure”). Regulation FD prohibits Benson Hill from disclosing material nonpublic information to securities professionals (including, for example, analysts, investment advisers and portfolio managers) and investors unless the information is simultaneously disclosed to the public generally.



To ensure compliance with Regulation FD, we have designated the following officials as “Authorized Spokespersons:”

- The Chief Executive Officer;
- The Chief Financial Officer;
- The Chief Legal Officer; and
- The Senior Director of Investor Relations.

Only the Authorized Spokespersons are authorized to communicate any information regarding Benson Hill to third parties. Employees who regularly interact with securities market professionals are specifically covered by Regulation FD and have a special responsibility to understand and comply with Regulation FD. Contact the Benson Hill legal department if you have any questions about the scope or application of Regulation FD. Benson Hill also has a detailed policy on Regulation FD, which may be obtained from the Benson Hill legal department.

Our Commitment to Society

Compliance with Laws

Benson Hill’s policy is to comply with all applicable laws and regulations that apply to our business. While it is impossible for anyone to know all aspects of every applicable law, Benson Hill expects its employees and associates to understand the major laws and regulations that apply to their work.

Benson Hill employees and associates must comply with the laws applicable in the jurisdictions in which they operate. There may be uncertainty with respect to the scope and application of all of the laws in every jurisdiction. Compliance with our Code requires a good faith effort to satisfy the intent and purpose of the applicable laws, consistent with our policy of ethical and honest business dealings. Any employee or associate who acquires knowledge of a violation of law, or who requires guidance on a matter of law, should consult with and be guided by Benson Hill’s legal department, or may report the same through the ethics hotline.

Technical and Scientific Integrity

Benson Hill conducts research and technical development to unlock the natural diversity of plants to create healthier, better tasting food. Benson Hill employees, associates, and any organization with whom it collaborates, will apply the highest ethical and scientific standards and will adopt robust processes and controls. Integrity in the collection and analysis of data, objectivity in data

interpretation and presentation, and strict adherence to intellectual property laws are foundational principles of our organization. Members of our breeding organization respect all laws and rights governing germplasm access and use, including applicable treaties, patents, plant variety protection certificates, and contractual obligations.

Environmental compliance

Benson Hill's employees and associates must abide by all laws, regulations and company policies relating to the protection of the environment. By following all environmental laws and regulations, we secure a better future for our communities and stakeholders.

Anti-Bribery

Benson Hill will not tolerate any employee, associate or individual on its behalf directly or indirectly offering, promising to pay or authorizing the payment of money or anything of value to foreign government officials, parties or political candidates, or international public organizations or the employees of foreign government officials, parties, or candidates (collectively "government officials") for the purpose of influencing the acts or decisions of government officials.

Human Rights

We are committed to treating people with dignity and respect in the workplace and in the communities where we do business. We are guided by the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work. We are committed to respecting human rights within our value chain, starting with the areas where we have the most control and influence, and where we can have the greatest impact. We commit to continually identifying and assessing relevant adverse impacts on human rights and will establish or support appropriate and effective mechanisms for prevention and remediation.

We respect freedom of association and our employees' right to join, or not to join, third party organizations such as labor unions or other lawful organization of their own selection, along with the right to bargain or not bargain collectively, in accordance with local laws, without fear of reprisal, intimidation, or harassment. We are committed to fostering open communication between all of our employees and managers, regardless of whether they are in unions, and providing our employees with appropriate access to grievance mechanisms and remedial action.

We are committed to engaging with our communities, including residents, businesses, landowners, Tribal Nations, government and other stakeholders on all potential impacts of our



operations, including human rights. We recognize we must continually listen to stakeholder feedback as regards our human rights policy and performance to understand, prevent and mitigate adverse impacts of our activities.

We expect our suppliers to adhere to these same principles, and to respect human rights in their operations and business relationships.

Conclusion

This Code contains general guidelines for conducting the business of Benson Hill consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact the Chief Legal Officer.

The sections of this Code titled “Reporting and Non-Retaliation,” “Accurate Financial Reporting,” “Creating, Maintaining, and Managing Accurate Business Records,” “Accuracy of Financial Reports and Other Public Communications,” “Conflicts of Interest,” and “Compliance with Laws,” as applied to our principal financial officers, shall be our “code of ethics” within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder, including Item 406 of Regulation S-K.

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



Exhibit A

BENSON HILL, INC.

CODE OF CONDUCT AND ETHICS ACKNOWLEDGMENT

I hereby acknowledge that I have received, read, understand and will comply with the Benson Hill, Inc. Code of Conduct and Ethics (the “Code”).

I will seek guidance from, and raise concerns about, possible violations of the Code with my leader or Benson Hill representative, the Benson Hill legal department, or through the ethics hotline.

I understand that my agreement to comply with the Code does not constitute a contract of employment.

Please sign here: _____

Print Name: _____

Date: _____