

CODEXIS, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

INTRODUCTION

This Code of Business Conduct and Ethics (the “**Code**”) contains general guidelines for conducting the business of Codexis, Inc. (the “**Company**”) consistent with the highest standards of business ethics. To the extent this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, we adhere to these higher standards.

This Code applies to all of our directors, officers and other employees. Agents and contractors to the Company are also expected to read and abide by the Code, to the extent relevant to their role. We refer to all officers and other employees covered by this Code as “employees,” unless the context otherwise requires. In this Code, we refer to our principal executive officer, principal financial officer and controller, or persons performing similar functions, as our “principal financial officers.”

Seeking Help and Information

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact Human Resources or the Company’s General Counsel or Chief Financial Officer. The Company has also established a Codexis Ethics Helpline that is available 24 hours a day, 7 days a week (see details in the next section). You may remain anonymous and will not be required to reveal your identity when you contact the Codexis Ethics Helpline, although providing your identity may assist the Company in addressing your questions or concerns. If you have any questions about applying the Code, it is your responsibility to seek guidance. This Code is not the exclusive source of guidance and information regarding the conduct of our business. You should consult applicable policies and procedures in specific areas as they apply. The Code is intended to supplement, not replace, the other policies and procedures of the Company.

Reporting Violations of This 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 the Company. If you know of or suspect a violation of this Code, immediately report the conduct to the head of Human Resources and your supervisor, or the head of Human Resources and the Company’s General Counsel or Chief Financial Officer. The Company’s Human Resources Department, General Counsel or Chief Financial Officer (and their designees) will work with you and your supervisor or other appropriate persons to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor, or you do not get a satisfactory response, you may contact the head of Human Resources, General Counsel or Chief Financial Officer directly. You may also report known or suspected violations of the Code on the Codexis

Ethics Helpline that is available 24 hours a day, 7 days a week by phone at 1-866-476-4623. The Codexis Ethics Helpline is also available online at www.codexis.ethicspoint.com. Regardless of how you contact the Codexis Ethics Helpline, you may remain anonymous and will not be required to reveal your identity, although providing your identity may assist the Company in investigating your concern. All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor, the Company's General Counsel or the Chief Financial Officer, as applicable, and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern.

It is Company policy that any employee or director who violates this Code will be subject to appropriate discipline, which may include termination of employment or removal from the Board of Directors, as appropriate. This determination will be based upon the facts and circumstances of each particular situation. If you are accused of violating this Code you will be given an opportunity to present your version of the events at issue prior to any determination of appropriate discipline. Employees and directors who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms. The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with the law or with this Code, can result in serious consequences for both you and the Company.

Policy Against Retaliation

The Company prohibits retaliation against an employee or director who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee because the employee, in good faith, sought help or filed a report will be subject to disciplinary action, including potential termination of employment or removal from the Board of Directors.

Cooperation With Company Investigations

All Company employees and directors are expected to cooperate with any investigation by the Company into known or suspected violations of this Code. Failure to provide such cooperation will be subject to appropriate discipline, which may include termination of employment or removal from the Board of Directors, as appropriate.

Waivers of the Code

Any waiver of this Code for our directors, executive officers or other principal financial officers 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 Nasdaq Stock Market. Waivers of this Code for other employees may be made only by the Company's Chief Executive Officer, General Counsel or Chief Financial Officer and may be reported to our Audit Committee.

CONFLICTS OF INTEREST

Identifying Potential Conflicts of Interest

A conflict of interest can occur when an employee's or director's private interest interferes, or appears to interfere, with the interests of the Company as a whole. You should avoid any private interest that influences your ability to act in the interests of the Company or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. While it is not feasible to describe all possible conflicts of interest that could develop, some of the more common conflicts that employees and directors should avoid include the following activities (with respect to themselves and their close family members/companions):

- Accepting personal gifts or entertainment from current or potential competitors, customers, suppliers ("suppliers" includes vendors, consultants and other goods and services providers), or collaborators;
- Working for a competitor, supplier, collaborator, or customer, or serving on a board or committee of an entity whose interests reasonably would be expected to conflict with those of the Company;
- Engaging in self-employment in competition with the Company;
- Using proprietary or confidential information of Company for personal gain or to the Company's detriment;
- Having a direct or indirect financial interest in or relationship with a competitor, customer, collaborator, or supplier, except that ownership of less than one percent (1%) of the publicly traded stock of a corporation will not be considered a conflict;
- Using Company property or labor for personal use;
- Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to the Company;
- Committing the Company to give its financial or other support to any outside activity or organization; or,
- Developing a personal relationship with an employee of the Company or with an employee of a competitor, supplier, collaborator, or customer that might interfere with the exercise of impartial judgment in decisions affecting the Company or any employees of the Company.

Disclosure of Conflicts of Interest

The Company requires that employees and directors disclose any situations that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your manager and the head of Human Resources who, if the circumstances warrant, will consult with the General Counsel and Chief Financial Officer. The matter will be addressed at the applicable level. Board members must provide notice of conflicts or potential conflicts to the CEO and General Counsel. Conflict of interest issues concerning Board

Revised November 9, 2023

members will be addressed by the appropriate committee of the Board of Directors.

CORPORATE OPPORTUNITIES

As an employee or director of the Company, you have an obligation to advance the Company'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 the Company, you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee may use corporate property, information or their position with the Company for personal gain or should compete with the Company while employed by us.

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

CONFIDENTIAL INFORMATION

Employees and directors have access to a variety of confidential information regarding the Company. Confidential information includes all proprietary and non-public information of the Company, and such information that might be of use to competitors, or, if disclosed, harmful to the Company or its customers. Employees have a duty to safeguard all confidential information of the Company and/or third parties with which the Company conducts business or has agreed to keep confidential, except when disclosure is authorized or legally mandated. An employee's or director's obligation to protect confidential information continues after they leave the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its customers and could result in legal liability to you and the Company.

Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to the Legal Department.

All employees are required to sign a Proprietary Information, Inventions and Employment Agreement promising to protect information that belongs to the Company and that ideas and inventions developed while working for the company are the property of the Company.

COMPETITION AND FAIR DEALING

All employees should endeavor to deal fairly with fellow employees and with the Company's customers, suppliers, collaborators, 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.

The Company is 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.
- Employees should not refuse to sell, service, or maintain products the Company has produced simply because a customer is buying products from another supplier.
- Customer entertainment should not exceed reasonable and customary business practice. Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for, customer purchase decisions. Please see “Gifts and Entertainment; Improper Payments” below for additional guidelines in this area.

Relationships with Suppliers/Collaborators

The Company deals fairly and honestly with its suppliers and collaborators. This means that our relationships with suppliers are based on price, quality, service and reputation, among other factors. Employees dealing with suppliers and collaborators should carefully guard their objectivity. Specifically, no employee should accept or solicit any personal benefit from a current or potential supplier or collaborator that might compromise, or appear to compromise, their objective assessment of the supplier’s products and prices. Employees can give or accept promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice. Please see “Gifts and Entertainment” below for additional guidelines in this area.

Relationships with Competitors

The Company is 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 further discussion of appropriate and inappropriate business conduct with competitors, see “Compliance with Antitrust Laws” below.

GIFTS AND ENTERTAINMENT; IMPROPER PAYMENTS

The giving and receiving of gifts is a common business practice, but is subject to this Code as well as other internal Company rules, regulations and policies as may be applicable. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among customers, suppliers, and other collaborators. Gifts and entertainment, however, should not compromise, or appear to compromise, your ability to make objective and fair business decisions, and you must be careful that gifts and entertainment are not construed as bribes, kickbacks or other improper payments. You should not authorize, offer, promise or give, or solicit or accept, money, gifts, entertainment, privileges, gratuities, benefits or other items of value intended to improperly influence, directly or indirectly, any business decision or that otherwise violate law or create the appearance of impropriety. You should contact the Legal Department or the Finance Department if you have any questions as to whether

Revised November 9, 2023

a payment is proper.

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 customers, suppliers, or other collaborators only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. 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;
 - A primary purpose of the meeting or attendance at the event is business related; and
 - The expenses would be paid by the Company 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 customers, suppliers, or collaborators.

- 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.

See “The Foreign Corrupt Practices Act” below 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 it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your supervisor. Your supervisor will bring the gift to the attention of Human Resources, General Counsel or Chief Financial Officer, who 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 supervisor or a principal financial officer 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., state or local governments. If you have any questions about this policy, contact your supervisor, the General Counsel or the Chief Financial Officer for

Revised November 9, 2023

additional guidance. For a more detailed discussion of special considerations applicable to dealing with the U.S., state and local governments, see “Interactions With Government below.”

THE FOREIGN CORRUPT PRACTICES ACT

The Foreign Corrupt Practices Act (the “**FCPA**”) prohibits the Company and its employees, directors and agents from offering or giving money or any other item of value to win or retain business or to influence any act or decision of any foreign government official, political party, candidate for political office or official of a public international organization. Stated more concisely, the FCPA prohibits the payment of bribes, kickback or other inducements to foreign officials. This prohibition also extends to payments to a sales representative, customer, supplier, collaborator, or agent or any other person if there is reason to believe that the payment will be used indirectly for a prohibited payment to foreign officials. Violation of the FCPA is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment.

COMPANY RECORDS

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports, regulatory submissions and many other aspects of our business and guide our business decision-making and strategic planning. Company records include financial records, personnel records, records relating to our product development and manufacturing, regulatory submissions and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable in all material respects. Each employee and director must follow any formal record retention policy of the Company with respect to Company records within such employee’s or director’s control. A request for a copy of any such record retention policy or questions concerning any such policy should be directed to your supervisor, or the Company’s Legal Department or Finance Department.

PROTECTION AND USE OF COMPANY ASSETS

Employees should protect the Company’s assets and ensure their efficient use for legitimate business purposes only, and use of Company’s assets are subject to internal facilities and informatics rules and policies, including those related to data protection and confidentiality. Theft, carelessness and waste have a direct impact on the Company’s financials. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

To ensure the protection and proper use of the Company’s assets, each employee should:

- Exercise reasonable care to prevent theft, damage or misuse of Company property;
- Report the actual or suspected theft, damage or misuse of Company property to a supervisor;
- Use the Company’s telephone system, other electronic communication services, written

materials and other property primarily for business-related purposes;

- Safeguard all electronic programs, data, communications and written materials from unauthorized (including inadvertent) access by others; and
- Use Company property only for legitimate business purposes, as authorized in connection with your job responsibilities

Employees should be aware that Company property includes all data and communications transmitted or received to or by, or contained in, the Company's electronic or telephonic systems. Company property also includes all written communications. Employees and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, the Company has the ability, and reserves the right, to monitor all electronic and telephonic communication. These communications may also be subject to disclosure to law enforcement or government officials.

PRODUCT SAFETY; QUALITY

Each employee must take ownership of our responsibility for protecting product quality and patient safety. The Company is committed to creating the highest quality products and adhering to all regulatory requirements, including as applicable, Good Manufacturing Practices. The Company also requires that our suppliers and other collaborators adhere to high standards.

If you learn of any potential product safety or quality issues or complaints, you must promptly report the issue to qa@codexis.com.

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 the Company's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the Company and result in legal liability.

The Company's Chief Financial Officer and other employees working in the Finance Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. 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.

SOCIAL MEDIA

When using social media personally, you must never suggest that you are speaking on behalf of the Company. When using social media and communicating with the public, you should use good judgment and common sense and avoid any posts that would be illegal, violate this Code, or embarrass the Company. You must never disclose confidential information of the Company or that of employees, customers, suppliers, or other affiliates and collaborators on social media.

Nothing in these requirements, however, should be interpreted to prevent you from engaging in activities that are protected under the law.

COMPLIANCE WITH LAWS AND REGULATIONS

Each employee and director has an obligation to comply with all laws, rules and regulations applicable to the Company's operations. These include, without limitation, laws covering bribery and kickbacks, the development, testing, approval, manufacture, marketing and sale of our products, copyrights, trademarks and trade secrets, information privacy, insider trading, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. Compliance with these laws, rules, and regulations includes compliance with Company rules, policies and procedures for Company's compliance with such laws, rules, and regulations. If any doubt exists about whether a course of action is appropriate, you should seek advice from your supervisor or the Company's Legal Department.

INTERACTIONS WITH THE GOVERNMENT

The Company may conduct business or interact with the U.S., state and local governments and the governments of many other countries. The Company is committed to conducting its business with all 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. In your interactions with the government:

- You should be forthright and candid at all times. No employee or director should intentionally misstate or omit any material information from any written or oral communication with the government.
- You should ensure that all required written submissions are made to the government and are timely, and that all written submissions, whether voluntary or required, satisfy applicable laws and regulations.
- You should not offer or exchange any gifts, gratuities or favors with, or pay for meals, entertainment, travel or other similar expenses for, government employees.

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 the Company has implemented. If any doubt exists about whether a course of action is lawful, you should seek advice immediately from your supervisor and the Company's Legal Department.

Company employees with responsibilities in the areas governed by the FFDCA and the FDA are required to understand and comply with these laws and regulations. These employees

are expected to have a thorough understanding of the laws, regulations and other relevant standards applicable to their job positions, and to comply with those requirements. The Company has developed standard operating procedures and provides regular training to aid employees in understanding and complying with the requirements of the FFDCA and the FDA. If any doubt exists regarding whether your job position or a particular course of action is governed by these laws and regulations, you should seek advice immediately from your supervisor and the Company's Legal Department.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

The Company encourages its employees and directors to participate in the political process as individuals and on their own time. However, federal and state contribution and lobbying laws severely limit the contributions the Company can make to political parties or candidates. It is Company policy that Company funds or assets not be used to make a political contribution to any political party or candidate, unless prior approval has been given by the Company's Chief Executive Officer, General Counsel or Chief Financial Officer.

The following guidelines are intended to ensure that any political activity you pursue complies with this policy:

- Contribution of Funds. You may contribute your personal funds to political parties or candidates. The Company will not reimburse you for personal political contributions.
- Volunteer Activities. You may participate in volunteer political activities during non-work time. You may not participate in volunteer political activities during working hours.
- Use of Company Facilities. The Company's facilities generally may not be used for political activities (including fundraisers or other activities related to running for office). However, the Company may make its facilities available for limited political functions, including speeches by government officials and political candidates, with the approval of the Company's Chief Executive Officer, General Counsel or Chief Financial Officer.
- Use of Company Name. When you participate in political activities, you should be careful to make it clear that your views and actions are your own, and not made on behalf of the Company. For instance, Company letterhead should not be used to send out personal letters in connection with political activities.

These guidelines are intended to ensure that any political activity you pursue is done voluntarily and with your own resources and time. Please contact the Company's Legal Department if you have any questions about this policy.

COMPLIANCE WITH ANTITRUST LAWS

Antitrust laws of the United States and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to 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. Violations of antitrust laws may result in severe penalties against the Company and its employees, including potentially substantial fines and criminal sanctions. You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should consult the Company's Legal Department with any questions you may have concerning compliance with these laws. The following is a summary of actions that are violations of applicable antitrust laws:

- Price Fixing. The Company may not agree with its competitors to raise, lower or stabilize prices or any element of price, including discounts and credit terms.
- Limitation of Supply. The Company may not agree with its competitors to limit its quantity or type of production or restrict the supply of its services.
- Allocation of Business. The Company may not agree with its competitors to divide or allocate markets, territories or customers.
- Monopolies. The Company may not engage in any behavior that can be construed as an attempt to monopolize.
- Boycott. The Company may not agree with its competitors to refuse to sell or purchase products from third parties. In addition, the Company may not prevent a customer from purchasing or using non-Company products or services.
- Tying. The Company may not require a customer to purchase a product that it does not want as a condition to the sale of a different product that the customer does wish to purchase.
- Price Discrimination. The Company may under some circumstances be prohibited from charging similarly situated customers different prices for the same good. Consult with the Company's Legal Department before undertaking any such pricing programs.

Meetings with Competitors

Employees should exercise caution in meetings with competitors. Any meeting with a competitor may give rise to the appearance of impropriety. As a result, if you plan to meet with a competitor for any reason, you must alert your manager, and if you or your manager have any questions or concerns, contact the Legal Department. You should try to meet with competitors in a closely monitored, controlled environment for a limited period of time. You should create and circulate agendas in advance of any such meetings, and the contents of your meeting should be fully documented. Specifically, you should avoid any communications with a competitor regarding prices, discounts or other terms or conditions of sale; profits or profit margins; costs;

allocation of product, customers, markets or territories; limitations on production or supply; boycotts of customers or suppliers; or bids or the intent to bid.

If you participate in a meeting with a competitor in which any of the above topics are broached, you should affirmatively end the discussion, and you should state your reasons for doing so. During meetings with competitors, avoid sharing or obtaining confidential information from the competitor. Also avoid statements that could be construed as unfair acts such as harassment, threats or interference with the competitors' existing contractual relationships.

Professional Organizations and Trade Associations

Employees should be cautious when attending meetings of professional organizations and trade associations at which competitors are present. Attending meetings of professional organizations and trade associations is both legal and proper, if such meetings have a legitimate business purpose and are conducted in an open fashion, adhering to a proper agenda. At such meetings, you should not discuss the restricted topics listed above, the Company's pricing policies or other competitive terms, plans for new or expanded facilities or any other proprietary, competitively sensitive information. You are required to notify your supervisor prior to attending any meeting of a professional organization or trade association that one or more competitors are likely to attend.

COMPLIANCE WITH INSIDER TRADING LAWS

Company employees and directors are prohibited from trading in the Company's stock or other securities while in possession of material, non-public information about the Company or its subsidiaries. In addition, Company employees and directors are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell the Company's stock or other securities on the basis of material, nonpublic information. Employees and directors who obtain material non-public information about another company in the course of their duties are prohibited from trading in the stock or securities of the other company while in possession of such information or "tipping" others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment or removal from the Board of Directors. You are required to read carefully and observe our Insider Trading Compliance Program, as amended from time to time, which is available from the Legal Department.

PUBLIC COMMUNICATIONS AND REGULATION FD

Public Communications Generally

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company 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 market-sensitive financial data. To ensure compliance with this policy, all news media or other public requests for information regarding the Company should be directed to Company's Corporate Communications Department at

Revised November 9, 2023

media@codexis.com, Investor Relations Department at ir@codexis.com and/or the Company's General Counsel or Chief Financial Officer.

Compliance with Regulation FD

In connection with its public communications, the Company is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for “fair disclosure”). Regulation FD provides that, when we disclose material, non-public information about the Company 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. You are required to comply with this Code as well as all Company policies regarding disclosure of information.

IMPORT LAWS AND COUNTER-TERRORISM

The Company must comply with import regulations as well as counter-terrorism requirements when engaging in international trade. If you are involved with importing, you need to be aware of the applicable governmental regulations and requirements, including those related to embargoes or sanctions against foreign countries or entities, and those required by the Customs-Trade Partnership Against Terrorism (C-TPAT). A failure to comply can result in fines, penalties, imprisonment and/or a loss of import privileges.

EXPORT LAWS

In general, anything the Company ships out of the United States must be covered by an export license. There are certain statutory general licenses which allow the Company to export some products without a specific license. Export control regulations are, however, quite complex and differ for companies located in the United States and abroad. If you are involved in any export transaction:

- You should ensure that there is some export license which allows the export transaction at issue.
- You should familiarize yourself with the list of countries against which the U.S. maintains total or partial bans on U.S. exports and the rules relating to exporting to such countries either directly or indirectly through foreign subsidiaries or other third parties.
- Any information which any employee furnishes to other Company employees, to the government or to companies that the Company may have hired to facilitate its export transactions must be truthful.

It is important to note that a domestic company may not facilitate or encourage a non-domestic company or subsidiary to perform a transaction that the domestic company could not perform directly itself pursuant to the export sanctions laws. If you have questions regarding import/export laws, contact the Finance Department or the Legal Department.

ENVIRONMENT, HEALTH AND SAFETY

The Company is committed to providing a safe and healthy working environment for its employees and to avoiding adverse impact and injury to the environment and the communities in which it does business. Company employees and directors 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. Failure to comply with environmental, health and safety laws and regulations 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 Legal Department if you have any questions about the laws, regulations and policies that apply to you.

Environment

All Company employees and directors should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. You have a responsibility to promptly report any known or suspected violations of environmental laws or any events that may result in an illegal discharge or emission of hazardous materials.

Health and Safety

The Company is committed to complying with all applicable relevant health and safety laws, and conducting its business in a manner that protects the safety of its employees. All employees and directors are required to comply with all applicable health and safety laws, regulations and policies relevant to their positions. If you have a concern about conditions that you believe are unsafe or tasks that you believe present a risk of injury, please report these concerns immediately to your supervisor or the Legal Department.

EMPLOYMENT PRACTICES

Company employees and directors 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 or removal from the Board of Directors. Copies of the Company's policies are available from the Human Resources Department. You should contact the Company's Human Resources Department if you have any questions about the laws, regulations and policies that apply to you.

Harassment and Discrimination

The Company is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, color, religion, national origin, ancestry, sex (including pregnancy), sexual orientation, gender identity, gender expression, marital status, domestic partner status, age, physical disability, mental disability, medical condition, genetic information, military veteran status or any characteristic protected by

Revised November 9, 2023

law. The Company also prohibits harassment based on these characteristics in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment includes, but is not limited to, offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive or racially degrading objects or pictures.

If you have any complaints about discrimination or harassment, report such conduct to your supervisor or the Human Resources Department. You can also call or visit the Codexis Ethics Helpline at 1-866-476-4623 or www.codexis.ethicspoint.com. All complaints will be treated with sensitivity and discretion. Your supervisor, the Human Resources Department and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by the Company, up to and including termination of employment or removal from the Board of Directors. The Company strictly prohibits retaliation against anyone who, in good faith, files a complaint.

Any member of management who has reason to believe that an employee has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the Human Resources Department immediately.

Alcohol and Drugs

You must be fit for duty and capable of performing your job responsibilities in a safe and productive manner free from the use of alcohol, illegal drugs, or any other substances (including prescription or over-the-counter medications) that could impact your ability to do your job safely. The Company will not tolerate substance abuse in the workplace.

There may be instances where drinking alcoholic beverages during Company business hours is appropriate, such as at Company-sponsored social settings, but you must still comply with all laws and Company policies. Always exercise both moderation and good judgment.

Violence Prevention

The safety and security of Company employees is vitally important. The Company will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or that is otherwise related to the Company, you must immediately report the situation to your supervisor and the Human Resources Department.

CONCLUSION

This Code contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your supervisor, the Company's General Counsel or Chief Financial Officer. You can also call or visit the Codexis Ethics Helpline at 1-866-476-4623 or www.codexis.ethicspoint.com. The Company expects all of its employees and directors, to adhere to these standards.

This Code, as applied to the Company's 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.

This Code and the matters contained herein do not affect the at-will nature of your employment with the Company. The Company reserves the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.

Acknowledgment of Receipt and Compliance

To: General Counsel

From: _____

Re: Codexis, Inc. Code of Business Conduct and Ethics

I have received, reviewed, and understand the above-referenced Code of Business Conduct and Ethics and hereby undertake, as a condition to my present and continued employment at Codexis, Inc., to comply fully with the policies and procedures contained therein.

Signature

Date

Print Name

Title