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SUBJECT: TAX BASIS INFORMATION/SYNGENTA AND NOVARTIS SHARES

To U.S. Shareholders of Novartis AG:

You have inquired for information to determine the tax basis of shares you hold in Syngenta AG stock (or ADSs in respect of such shares). This letter provides some general information concerning the U.S. federal income tax determination of tax basis for shares of Syngenta AG stock (or ADSs in respect of such shares) received by U.S. shareholders of Novartis AG as a result of the recent spin-off (or "demerger") of the worldwide agricultural business of Novartis AG, and the combination of that business with the worldwide agrichemicals business of AstraZeneca PLC under a Swiss holding company, Syngenta AG (the "Combination").

In connection with the Combination, shareholders of Novartis AG received a distribution of shares of the stock of Novartis Agribusiness Holding Inc., a newly formed Delaware corporation holding the U.S. agricultural business of Novartis AG (the "U.S. Spin-Off"). In addition, Novartis AG shareholders were given the right to purchase shares of the stock of Novartis Agri Holding AG, a newly formed Swiss corporation holding the agricultural business of Novartis AG located outside the United States (the "Swiss Spin-Off"). Following the U.S. Spin-Off and the Swiss Spin-Off, Syngenta AG issued shares of its common stock (or ADSs in respect of such shares) in exchange for all of the outstanding stock of Novartis Agribusiness Holding Inc. and Novartis Agri Holding AG, by operation of separate mergers undertaken in accordance with U.S. corporate and Swiss corporate law, respectively (the "Mergers").

For U.S. federal income tax purposes, as more fully described in the prospectus provided to you dated September 18, 2000 (the "Prospectus"), the U.S. Spin-Off, the Swiss Spin-Off and the Mergers (collectively, the "Novartis Demerger Transactions") were intended to qualify as "nonrecognition transactions" in which U.S. shareholders would not be expected to recognize taxable gain or loss (except to the extent that cash is received in lieu of shares of the stock of Novartis Agribusiness Holding Inc., Novartis Agri Holding AG or Syngenta AG, as the case may be). However, due to the complex and sometimes unsettled nature of the relevant U.S. federal income tax law, there are some uncertainties regarding the qualification of the Novartis Demerger Transactions as nonrecognition transactions. Furthermore, no ruling has been or will be obtained from the U.S. Internal Revenue Service (the "IRS") with respect to the Novartis Demerger Transactions or any other aspect of the Combination, and no assurance can be given that the IRS will not take a contrary position upon an examination, or that a court will not agree with the position of the IRS in the event of litigation.

You are strongly urged to consult your own tax advisor regarding the U.S. federal income tax consequences of the Novartis Demerger Transactions, as well as the tax consequences under applicable state, local and non-U.S. tax law.

Assuming that the Novartis Demerger Transactions qualify as nonrecognition transactions, a U.S. shareholder of Novartis AG would be required to allocate the aggregate tax basis of his or her shares of Novartis AG common stock (or ADSs in respect of such shares) between such shares (or ADSs) and the shares of Syngenta AG common stock (or ADSs in respect of such shares) received pursuant to the Novartis Demerger Transactions. Under relevant Treasury regulations, such allocation should be based upon the relative fair market values of the Novartis AG common stock (or ADSs) and the Syngenta AG common stock (or ADSs) held by such shareholder following consummation of the U.S. Spin-Off and the Swiss Spin-Off. While there is no clear guidance as to how and when the required determination of fair market value should be made, we believe that the average of the high and low trading prices for shares of Novartis AG and Syngenta AG common stock on the Swiss stock exchange on November 13, 2000 (the first day on which Syngenta AG common stock began trading on such exchange) would be the most reasonable approach in this instance.

Using the foregoing methodology, a U.S. shareholder could allocate 2.717% of the aggregate tax basis of his or her shares of Novartis AG common stock (or ADSs in respect of such shares) to the shares of Syngenta AG common stock (or ADS in respect of such shares) received pursuant to the Novartis Demerger Transactions.* We caution, however, that the IRS could challenge the reasonableness of the allocation adopted by a U.S. shareholder of Novartis AG. In this regard, the reasonableness of the allocation described herein would be dependent upon, among other things, the validity of an assumption that the fair market value of Syngenta AG common stock (or ADSs) held by a U.S. shareholder on November 13, 2000 is representative of the fair market value of the shares of common stock of Novartis Agribusiness Holding Inc. and Novartis Agri Holding AG (or ADSs in respect of such shares) to which such shareholder became entitled at the time of the U.S. Spin-Off and the Swiss Spin-Off, respectively (and, thus, that no material changes occurred during the interim period).

In the Swiss Spin-Off, Novartis AG shareholders were required to pay an exercise price of CHF 10 per share (or CHF 2 per ADS) in order to acquire stock of Novartis Agri Holding AG. Although not entirely clear under current U.S. federal income tax law, we believe that a U.S. shareholder could increase the tax basis of his or her shares of Novartis AG common stock (or ADSs in respect of such shares) in an amount equal to the exercise price paid by such shareholder in respect of the Swiss Spin-Off, and to allocate the additional tax basis between such Novartis AG common stock (or ADSs) and the shares of Syngenta AG common stock (or ADSs in respect of such shares) received pursuant to the Novartis Demerger Transactions using

* The allocation percentage represents a ratio the numerator of which is the average trading price of Syngenta AG common stock, and the denominator of which is the sum of the average trading prices of Syngenta AG common stock and Novartis AG common stock, in each as determined on the Swiss Stock Exchange on November 13, 2000. The remaining tax basis would continue to be allocated to the Novartis AG common stock (or ADSs) held by the U.S. shareholder.

the allocation method described above. Under an alternative approach, the full amount paid by a U.S. shareholder as exercise price for the stock of Novartis Agri Holding AG might be allocated entirely to his or her Syngenta AG common stock (or ADSs).

As explained in the Prospectus, The Bank of New York, the ADS Depository, intended to sell a number of shares of Syngenta AG common stock on behalf of the U.S. shareholders of Novartis AG for purposes of obtaining sufficient proceeds to cover the payment of the exercise price in respect of the Swiss Spin-Off. Moreover, some U.S. shareholders of Novartis AG may have been paid cash in lieu of fractional shares of Syngenta AG common stock (or in lieu of fractional ADSs in respect of such shares), which payments generally would be treated as made in redemption of such fractional shares (or ADSs). Accordingly, if you were the beneficiary of such a sale by the ADS Depository, or if you received cash in lieu of fractional shares (or ADSs), you may be required to recognize taxable gain or loss in connection with an actual or deemed sale of Syngenta AG common stock (or ADSs).

Please note that this letter has been furnished to you for general information purposes only, and it is not to be relied upon as tax advice by you or any other person. Furthermore, we do not undertake to inform you if any of the information set forth in this letter is subsequently determined to be inaccurate, or is affected by changes in U.S. federal income tax law or administrative practice. Each U.S. shareholder of Novartis AG is strongly urged to consult his or her own tax advisor regarding the allocation of tax basis to shares of Syngenta AG common stock (or ADSs in respect of such shares) and other tax considerations relevant to the Novartis Demerger Transactions and the Combination under U.S. federal income tax law, as well as under the laws of applicable state, local and non-U.S. jurisdictions.

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