

California Transparency Act Disclosure

DISCLOSURES REQUIRED PURSUANT TO THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

1. Internal Accountability

Nutrien signed onto the United Nations Global Compact in April 2008. As a Global Compact participant, we are committed to the 10 principles including the two principles related to human rights and labor which are the elimination of all forms of forced and compulsory labor, and the effective abolition of child labor.

As part of this commitment, we share publicly the progress we've made in aligning our business practices with the 10 Global Compact principles. The following link summarizes where we share our performance or programs related to each principle: <http://www.Nutrien.com/en/sustainability/overview/performance/united-nations-global-compact-index>

Nutrien's Code of Ethics is a key document that outlines our expectations for employee behavior. We expect every employee in every geographic region to act with integrity in all that they do. The full text can be found at <https://www.nutrien.com/sites/default/files/uploads/2018-02/Nutrien%20Code%20of%20Ethics.pdf> As part of the Code of Ethics we acknowledge *"It is our responsibility to know our suppliers, customers and business partners. We should strive to conduct business with those who act in a responsible manner and refuse to work with those that we know commit human rights abuses, violate anticorruption laws, or otherwise risk impugning the reputation of Nutrien."*

Nutrien maintains an employee Compliance Hotline that is accessible throughout the world in all major languages common for the countries in which we operate. Nutrien has a non-retaliation policy designed to enable employees to raise good faith issues in a safe environment without fear of retaliation. The Hotline also promises anonymity where legally permissible. Nutrien employees are encouraged to report to their supervisors, any member of senior management, or to the anonymous Hotline, any violations of our company's Code of Ethics. Nutrien will disclose the nature of the calls received to this Hotline in its Sustainability Reports. All calls to the Hotline or to the Legal Compliance Department are taken seriously. High Risk matters are managed and handled by the Legal Compliance Department. Lower Risk matters are handled by relevant departments (e.g., EHS&S and HR). For those matters that are substantiated, discipline is determined on a case-by-case basis, but can include punishment up to and including termination.

2. Training

All employees, including management, are trained on Nutrien's Code of Ethics and strategic risks on an annual basis and were all informed about the addition of the Supplier Code of Ethics. The standard Code of Ethics training for Nutrien includes certifications of past and future compliance with the Code of Ethics. Refresher training in these areas is mandatory for all Nutrien employees in modules that highlight different aspects of our Code of Ethics each year. Nutrien will disclose in our [sustainability reports](#) the number of employees that received training related to the Code of Ethics, anticorruption and competition law each year. For those employees working in High Risk supply chain management roles, employees are

educated about risks identified through our supply chain due diligence that may include human rights abuses including slavery, child labour or any other risk discovered.

3. Verification

In addition to the Code of Ethics for our employees, Nutrien has a Supplier Code of Ethics. The Supplier Code of Ethics identifies those principles that Nutrien believes are important for Corporate Social Responsibility. The Supplier Code of Ethics sets out requirements in terms of Human Rights and other CSR issues, and states clearly that suppliers “*must not tolerate Child, Exploitative, Forced or Compulsory Labour, or Corporal Punishment.*” Additionally, suppliers are encouraged to: allocate appropriate resources to achieve compliance with the Supplier Code of Ethics, offer related employee training, develop related management systems, including procedures and assessments and communicate the requirements of the Supplier Code of Ethics through their supply chain among others.

As part of the Supplier Code processes, Nutrien has a due diligence program developed to evaluate potential suppliers for the issues outlined in its Supplier Code of Ethics. This process is conducted internally and, where appropriate, externally. Because Nutrien does not have operations in countries where risks of slavery or human trafficking in a commercial setting are high, Nutrien uses a risk-based approach developed by an external provider and internal experts to identify those suppliers that warrant more detailed reviews.

4. Certification

Since the inception of the Supplier Code of Ethics, Nutrien began asking new suppliers to contractually commit to compliance with Nutrien’s Supplier Code of Ethics. Where new Suppliers refuse to follow the principles of our Supplier Code of Ethics or show signs that they are not committed to improving their practices to comply with the principles of the Supplier Code of Ethics, Nutrien will review its relationship with the Supplier. Where contractual commitments and local law permit, this review may include termination of our relationship with the noncompliant Supplier.

5. Audits

As part of the Supplier Code of Ethics process, Nutrien began conducting in-person audits of suppliers on a risk basis. These audits have and will continue to use external experts or internal experts based on risk and cover a wide range of human rights issues including child and forced labour.