



Supplier Code of Ethics

Supplier Code of Ethics

PART I – GENERAL

Introduction

Nutrien is committed to working with our stakeholders to enhance economic, environmental and social performance. We are guided by the following principles:

- » Operating safely to ensure no harm to our people;
- » Minimizing our environmental footprint, including waste emissions and discharges from our operations;
- » Conducting our business with integrity and respect while fostering a culture of honesty and accountability;
- » Encouraging respect for the human rights, culture, diversity and dignity of all individuals; and
- » Being an active and contributing member of our communities.

Nutrien also expects to build strong, trusting, and sustainable business relationships with its Suppliers. It also expects its Suppliers to act responsibly and ethically and to respect human rights when doing business with or on behalf of Nutrien, and to ensure that its own supply network does the same. This Supplier Code of Ethics (“Code”) clarifies Nutrien’s expectations of its Suppliers in the areas of business ethics, sustainability and human rights.

In this Code, “Nutrien” includes the Nutrien Group of Companies, meaning all of its affiliated entities (i.e., entities in which Nutrien controls or owns, directly or indirectly, more than 50% of the outstanding shares) (collectively referred to as “Nutrien”).

Scope of Application

Nutrien’s Suppliers **must** comply with the Code. Each Supplier must also ensure that its affiliated entities, employees, sub-contractors and its own supply chain will comply with the Code.

This Code benchmarks the **minimum** requirements of acceptable conduct. We strongly encourage Suppliers to exceed the minimum requirements of this Code and to promote best practices and continuous improvement throughout their operations. Where local laws impose less restrictive obligations, Nutrien expects the Supplier to adhere to this Code.

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Practical Application of the Supplier Code

Suppliers are expected to use their best judgment when seeking to comply with the words and spirit of the Code. If the Code does not cover a specific situation, the following questions will help you make the right personal decision. **If the answer to any of these questions is “no,” presume the behavior does not comply with the Code.**

- » Is it legal?
- » Is it fair?
- » Would I want other people to know about it?
- » Would Nutrien be harmed if it became public knowledge?
- » Would a fellow employee, a Supplier, a customer, a shareholder or a member of the community that is affected approve?

Implementation and Oversight

In order to demonstrate to Nutrien that the Supplier is compliant with the Code, the Supplier must:

- » Develop and maintain accurate and complete documentation to demonstrate compliance with the Code and retain such documentation for a minimum of seven years;
- » Provide Nutrien's representatives with access to all documentation upon request;
- » Allow Nutrien's representatives to conduct interviews with Supplier employees and management and scheduled site visits to assess compliance;
- » Respond promptly to reasonable inquiries from Nutrien representatives regarding compliance with the Code; and
- » Acknowledge acceptance of Nutrien's Supplier Code of Ethics via electronic acceptance/signatures when requested by Nutrien. Additional Supplier resources are detailed in Nutrien's Supplier Resource Kit Documents www.nutrien.com/suppliers.

Alignment with other Nutrien policies, procedures, and principles

The Code aligns with broader policies that govern the way Nutrien operates and engages in company-wide business activities. These policies, procedures and principles include but are not limited to the following:

- » Nutrien Procurement Procedure;
- » Diversity and Inclusion; and
- » Nutrien Code of Ethics.

All current and prospective Suppliers are expected to be familiar with the principles detailed in these policies and to meet all requirements as set out at www.nutrien.com/suppliers/becoming-nutrien-supplier before applying to be a Nutrien Supplier. For further information, visit the Nutrien website at www.nutrien.com.

Non-compliance with the Code

Compliance with the Code is mandatory. If a Supplier fails to comply with the Code or shows signs that it is not committed to improving its practices to ensure compliance with the Code, Nutrien will review its relationship with the Supplier. This review may result in consequences up to and including the termination of our relationship with the Supplier.

No third-party beneficiary rights

This Code does not create or intend to create any third-party beneficiary rights.



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PART II – SPECIFIC CODE REQUIREMENTS

Suppliers must comply with the following:

Compliance with Laws and Contracts

- » Comply with all applicable laws, regulations, and contracts that relate to the goods or services supplied to Nutrien, promptly report any violations to Nutrien, and identify a remediation plan;

No Retaliation

- » Not tolerate retaliation of any kind against a person making a report or complaint of a violation of the Code, or other illegal or unethical conduct, or against a person cooperating in an investigation related to a report or complaint;

Conflicts of Interest

- » Disclose at the outset and continue to disclose any relationships and/or interests (financial or otherwise) that might represent an actual conflict of interest or even the appearance of a conflict of interest with Nutrien;

Please see **Nutrien's Code of Ethics** for further information as to what constitutes a Conflict of Interest:

www.nutrien.com/sites/default/files/uploads/2018-11/Nutrien%20Code%20of%20Ethics.pdf

Compliance with Anti-Corruption and Anti-Bribery Laws

- » Abide by all applicable anti-Corruption and anti-Bribery laws, and never directly or indirectly practice or tolerate any form of corruption, bribery, kickbacks, money-laundering, fraud, facilitation payments, embezzlement or extortion;
- » Bribery includes Bribery of a government official, and commercial Bribery of one of our employees or a third party who is engaged to act on Nutrien's behalf;

A **Bribe** can take many forms, including cash and cash equivalents, gifts, entertainment, meals, travel, below-market loans, preferential hiring, favors and political and charitable donations.

Compliance with Competition Laws

- » Not engage in any activity that would constitute an unreasonable restraint of trade, unfair trade practice, or other anti-competitive course of conduct in violation of any applicable competition laws;

Confidential information includes all non-public information the disclosure of which might harm Nutrien, Nutrien's customers, or be used in a way to support Nutrien's competitors. Confidential information can be given verbally or in written or electronic forms.

Protection of Nutrien's Assets and Confidential information

- » Protect Nutrien's assets and confidential information, and not disclose any confidential information to any third party, without the approval of Nutrien's Chief Legal Officer;

Procurement

- » Ensure components utilized in supplied goods and materials do not contain metals derived from minerals or derivatives originated from conflict regions that directly or indirectly finance or benefit armed groups and cause or foster human rights abuses, and are acquired legally and meet legally regulated use requirements;
- » Ensure the legal regulatory classification of supplied materials is communicated accurately;

Health, Safety & Environment

- » Comply with all applicable health, safety and environmental regulations;
- » Provide a work environment that promotes the highest standards of health, safety and environmental behavior;
- » Manage and communicate the health, safety and environmental risks associated with provided goods or services by including such information as Material Safety Data Sheets, operating instructions, personal protective measures and safeguards, etc. as necessary;
- » Maximize environmental protection through efficient use of energy and natural resources;

Please refer to
<https://www.nutrien.com/sustainability/priorities/workplace>

Abuse, Harassment, Discrimination and Disciplinary Action

- » Not tolerate unlawful workplace conduct, including abuse, harassment, discrimination (defined as the unjust or prejudicial treatment of people based on a legally protected status), intimidation, unsafe working conditions or coercion;

Legally protected status includes race, gender, gender identity, gender expression, color, religion, national origin, age, qualifying disability, veteran status, marital status, family status, pregnancy, sexual orientation, or any other classification protected under applicable laws.

Human Rights and Diversity

- » Mitigate the human rights impacts they cause, contribute to or are linked to, in accordance with applicable law and international standards;
- » Reflect the diversity of the communities in which their business operates to grow opportunities for Aboriginal, minority and women-owned businesses;

International standards include the Voluntary Principles on Security and Human Rights and the core conventions of the International Labor Organization's (ILO) and the United Nations (UN) such as the UN's Universal Declaration of Human Rights, the UN's Declaration on the Rights of Indigenous Peoples, and the UN's Guiding Principles on Business and Human Rights.

Forced or Compulsory Labor and Human Trafficking

- » Not directly or indirectly participate in any form of forced or compulsory labor;
- » Not require workers to surrender, as a condition of employment, any government-issued identification, passports, work permits or any other documents necessary for free movement and termination of employment;
- » Allow workers to leave work and freely terminate their employment (taking into account legal notice period requirements);
- » Not directly or indirectly participate in any form of human trafficking;

Forced or compulsory labour includes work or services that are coerced under threat, force or penalty, including any kind of involuntary or compulsory, indentured or bonded labour, slavery, servitude or other slavery-like circumstances.

Human trafficking includes the recruitment, transportation, transfer, harbouring or receipt of persons, under threat or by means of force or other forms of coercion, abduction, fraud, deception or abuse of power.

Child Labor

- » Not employ persons below the minimum age permitted by local law and the core conventions of the ILO including ILO Convention 138;
- » In no circumstances engage in the “worst forms of child labor” contrary to ILO Convention 182;
- » Where local laws impose less restrictive obligations, Nutrien expects the Supplier to adhere to the applicable ILO Convention;

ILO Convention 138 (The Minimum Age Convention, 1973) sets the general minimum age for employment at 15 years (13 for light work), and the minimum age for hazardous work at 18 (16 under certain strict conditions), subject to exceptions.

ILO Convention 182 (The Worst Forms of Child Labour Convention, 1999) seeks to eliminate the worst forms of child labour including work which is likely to harm the health and safety of children.

Compensation, Benefits and Working Hours

- » Ensure that all applicable labor and employment laws are followed, and ensure that all working conditions, including but not limited to wages and hours of work are respected and adhered to at all times;

Freedom of Association

- » Uphold employees’ right to freedom of association, and the rights to collective bargaining and to form and join trade unions, in accordance with local laws; and
- » Provide employees with equal pay for equal work, timely pay, and periodic holidays with pay.

Other Supplier Responsibilities

Nutrien expects its Suppliers to:

- » Allocate appropriate resources to achieve compliance with this Code;
- » Offer employee training to promote and ensure compliance with the Code;

- » Develop management systems, procedures and assessments to ensure compliance with the Code;
- » Communicate the requirements of this Code, or their own Code of Ethics if substantially similar to this Code, throughout their supply chain;
- » Consider externally reporting their commitments, activities and performance related to sustainability, including, but not limited to: human rights; non- discrimination, diversity and equal opportunity; business ethics; stakeholder engagement; community relations; occupational health and safety; environment; and employee relations.

Confidential Contact

Nutrien has established a secure communication channel to enable the Suppliers to confidentially raise concerns and compliance matters related to the Code.

If you have questions about the Code of Ethics, you are encouraged to contact the Nutrien Procurement team at SupplierSupport@nutrien.com or a member of the Compliance Team at compliance@nutrien.com.

If you wish to report a questionable behavior or possible violation of the Code, you are encouraged to contact our confidential Compliance line at 1-800-383-4520 or visit our compliance hotline at <https://secure.ethicspoint.com/domain/media/en/gui/48425/index.html>.



