

Code of Business Conduct and Ethics

United in Purpose. Stronger Together.
Rooted in Integrity.





CEO Message

Building a respected reputation does not happen by chance. It is the result of actions and behaviors that demonstrate a commitment to doing the right thing—with ethics and integrity.

The Mosaic Code of Business Conduct and Ethics does more than confirm our commitment to comply with the law and adhere to the highest ethical standards. It defines our expectations on how we serve our customers, operate our business, work with partners, collaborate with one another, and support the communities where we live and work. It's our public statement validating that we conduct our work with an emphasis on integrity and excellence, for the benefit of all our stakeholders.

Within these pages, you will find the road map of the principles and priorities that guide our work. No matter where Mosaic operates in the world, each of us has an obligation to read the Code, understand it and follow it, every day, without exception. Our continued success depends on it.

Thank you for your ongoing commitment to follow our Code, and for your continued efforts to make Mosaic the most respected name in the crop nutrition industry.

Sincerely,

JOC O'ROURKE
PRESIDENT AND CEO

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Our Mission

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We help the
world grow the
food it needs.





Our Principles

We are responsible, innovative, collaborative and driven.

We are accountable for the safety and well-being of our colleagues and our company. We act with integrity and conviction. We are careful stewards of natural resources. We collaborate across departments and geographies to accelerate our performance. We foster innovation and encourage ideas that make us better. We strive to achieve excellence knowing that we can always improve.

Our Priorities

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Develop, Engage and Empower Our People

Work together to build a culture based on our guiding principles, where people are proud to work and grow.



Grow and Strengthen Our Business

Maximize efficiency, accelerate growth and deliver exceptional products and services for our customers—safely and sustainably.



Create Value for Our Stakeholders

Be transparent, operate responsibly, build trusted relationships and help our stakeholders thrive.





Our Code

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How We Use Our Code

Our Code defines our expectations for how we conduct our business, serve our customers, work with partners, respect each other and support the communities where we live and work.

The Code cannot provide every answer to every situation. However, the Code is a valuable resource to guide our daily actions and interactions to ensure that we conduct our business with ethics, integrity and fairness at all times, while holding true to our principles and following all laws and regulations.

Importantly, the Code also provides information on where you can go to reach out for help or support, or to report any suspected violations.



Our Responsibilities

We are all responsible for complying with the Code. The Code helps guide our actions to ensure compliance with our principles, ethics and the law. Provisions of our Code cannot be waived.

Violations of our Code could lead to serious employment consequences, up to and including termination of employment, and could affect Mosaic's reputation and license to operate. As employees we:

- Understand and comply with our Code, our policies and all relevant laws and regulations
- Conduct all business honestly, ethically and with integrity
- Respect our co-workers and working environment
- Report any suspected violations of our Code or the law

Our leaders play a special role in guiding our culture. While all employees, regardless of position, are responsible for understanding and following the Code, we hold our leaders to a higher standard in upholding Mosaic's values and principles, enforcing the Code and cultivating an environment where employees are valued, respected and feel safe speaking up and reporting concerns. Our leaders:

- Lead by example
- Uphold our standards for maintaining safe, sustainable work environments
- Encourage a speak-up culture and support those who raise concerns
- Create a respectful and inclusive culture where every employee feels welcomed, valued, respected and safe to bring their entire self to work
- Resolve concerns fairly and in alignment with our Code
- Act to immediately address and eliminate violations of our Code

Safeguarding Our Reputation

Mosaic's reputation for quality, excellence and innovation has grown out of a commitment to our mission and principles. Our customers, business partners and other stakeholders know they can rely on Mosaic to act with integrity and as a responsible steward of our workforce, relationships and the environment. We are honored with their trust and faith, and we are all responsible for maintaining it.

To ensure we uphold our reputation, we:

- Maintain optimal operations to preserve our reputation for quality
- Act with integrity and conviction, with both our team members and our broader community of customers, partners and other stakeholders
- Communicate openly and honestly to keep our business flexible, adaptable and competitive
- Advocate for Mosaic products and services in a respectful and professional manner
- Assess and minimize risks to our operations and workers
- Perform due diligence on our business partners to ensure value alignment
- Follow all policies, procedures and laws that pertain to our business everywhere in the world

How We Act Ethically

At times, we may be unsure how best to act ethically. We make sound decisions by asking:

- Is it legal?
- Is it honest?
- Does it comply with the Mosaic Code and policies?
- Would it reflect well on me and Mosaic if reported in the news?

If the answer to any of the above questions is no, do not proceed. Seek further guidance from team members, a People Leader, our Code, Human Resources, the Law Department or another Mosaic resource. When in doubt, seek guidance. We must ensure that our choices and actions are legal, ethical and in compliance with our Code and policies, and do not jeopardize Mosaic's mission, values or reputation.



How We Speak Up

Speaking up takes courage. It takes employees at all levels across the organization to build and sustain a culture of integrity, trust and responsibility. Remember that each of us has a right and a responsibility to ask questions, raise concerns and report suspected misconduct. Mosaic encourages, values and protects the reporting of concerns.

If you have a concern about a violation of this Code or Mosaic policy, you should share that concern immediately with your People Leader or local Human Resources Representative. This is a critical first step. If for any reason you are uncomfortable going to your People Leader, or the issue is not resolved by your local leadership, you may escalate the issue to a more senior leader, the Law Department or Mosaic's EthicsPoint Helpline.

No one should fear making a report in good faith. Retaliation against someone for raising a concern or participating in an investigation is prohibited by our [Non-Retaliation Policy](#) and will result in discipline, up to and including termination.

If you are unclear about the best course of action, or if something doesn't seem right, ask questions or raise a concern. Never look the other way if you believe someone is failing to follow the Code. By speaking up, you protect yourself, your co-workers, your workplace, your environment and Mosaic's reputation.

Resources are available to support you.

For assistance or to report a concern, contact:

- **Human Resources / HR Connect:** 1-855-660-6947
For issues related to employee relations
- **Law Department:** Law@mosaicco.com
For legal and regulatory issues, particularly in the event of a government inquiry or investigation, sanctions, fraud, corruption or bribery
- **Internal Audit:** Robotics.InternalAudit@mosaicco.com
For financial and accounting issues, including misappropriation of assets
- **Investor Relations:** investor@mosaicco.com
For shareholder issues
- **Public Affairs:** public.affairs@mosaicco.com
For issues related to politics, charitable giving and media inquiries
- **Environmental, Health and Safety (EHS):** [My Mosaic](#)
For environmental, health and safety issues
- **Chair of the Audit Committee of the Board:**
auditchair@mosaicco.com
For accounting and audit issues

To make a report through an independent third party, use the EthicsPoint Helpline. Although we encourage reporters to provide contact information so that we can investigate as thoroughly as possible, reports through the helpline can be anonymous. EthicsPoint is available on the Web at www.mosaic.ethicspoint.com or via phone:

- | | |
|-----------------------------------|----------------------------------|
| • Australia: 1-800-290-653 | • Peru: 0800-77-582 |
| • Brazil: 0800-892-0309 | • Saudi Arabia: 1-800-10, |
| • Canada: 1-877-261-2609 | at the prompt dial |
| • China: 4006000859 | 877-261-2609 |
| • India: 000-800-040-2098 | • United States: |
| • Paraguay: | 1-877-261-2609 |
| 0098004410207 | |

Our People

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Insisting on Fair Treatment

At Mosaic, we provide opportunity based on skill and aptitude. We are committed to providing equal employment opportunities to all qualified Mosaic applicants and employees on the basis of competence and merit, and not on the basis of any protected characteristic. We work to improve access and remove barriers so that we can attract, retain and promote a more innovative, collaborative and diverse workforce.

We do not tolerate discrimination of any kind. Our culture thrives when we base decisions on merit and fairness because it ensures we bring in the best people—and bring out the best in ourselves.

HOW WE STAY ROOTED IN INTEGRITY

We ensure fair treatment when we:

- Focus on the quality, skill and value we each bring to Mosaic
- Make all employment decisions based on qualifications and merit
- Never discriminate based on a protected characteristic, including but not limited to:
 - Race
 - National or ethnic origin
 - Religion
 - Age
 - Gender, gender identity or sexual orientation
 - Military or veteran status
 - Marital status
 - Disability
- Ensure our workplaces provide reasonable accommodations to all qualified persons with disabilities to allow them to perform the essential functions of their job

Building Our Culture

Together, we are building a culture based on our principles, mutual respect, understanding and priorities. Mosaic encourages continued learning for all employees to advance their careers. Always keep the following in mind:

- Take opportunities to learn
- Leverage the Mosaic Leadership Model
- Share objectives cooperatively and partner with others to get things done
- Share information and resources with team members
- Think about what is best for Mosaic and credit others when they achieve something
- Help your team members grow
- Always listen attentively and seek different points of view
- Be persistent and ethical in accomplishing objectives
- Recognize and interrupt bias



LEARN MORE

[Equal Employment Opportunity Policy](#)
[Equal Employment Opportunity Statement and Commitment](#)
[Discrimination, Harassment and Retaliation Prevention Policy](#)
[Reasonable Accommodation Policy](#)

Maintaining Workplace Respect

Our collaborative work environments are built around trust and respect. We ensure our well-being and do our best work when we value, respect and include all people. Harassment and intimidation of any kind are not tolerated at Mosaic.

HOW WE STAY ROOTED IN INTEGRITY

We maintain respect in the workplace when we:

- Recognize the inherent value of all people, always
- Speak up if we witness harassment or offensive conduct
- Acknowledge contributions and accomplishments of others
- Build environments of trust by being open, honest and transparent
- Recognize bias and work to interrupt it



LEARN MORE

[Discrimination, Harassment, and Retaliation Prevention Policy](#)

Harassment and Intimidation

We have zero tolerance for any forms of intimidation or harassment. Unwelcome sexual advances, bullying, hazing, and threats of violence have no place at Mosaic.

Harassment is any unwelcome verbal or physical conduct that directly or indirectly alters an employee's work environment, unreasonably interferes with an employee's job performance or creates an intimidating, hostile or offensive work environment. Remember that harassment is not about what we intend with our words and actions but how others may perceive them. Harassment can come in many forms, including:

- What we say or write, such as racial or gender-based slurs, stereotypes and threatening or abusive language
- What we do, such as unwelcome touching, sexual advances or conditioning employment opportunities on inappropriate or unlawful favors
- What we display, such as sexually suggestive materials, inappropriate photos, offensive or vulgar language, or inappropriate websites



Q&A

Our Code in Action

Q: I've been with Mosaic for three years now. One of my co-workers is passionate about his political beliefs. Usually I'm fine with this, but lately he's been saying things that make me uncomfortable. I don't want to engage him in a political debate, but I think some of the things he says are inappropriate for work. Should I just ignore him?

A: At Mosaic, we all have a right to our political views; however, political speech should never be disrespectful, threatening or offensive. Discuss the matter with Human Resources to find a solution. If you find your co-worker's statements offensive, others in your department probably do too. Speak up to ensure a respectful work environment for everyone.



Focusing on Health and Safety

We are all accountable for our health and safety. In our relentless pursuit of injury-free and healthy workplaces, we are vigilant in identifying and sharing risks so that we can work to eliminate or minimize them. Every worker and visitor to our sites deserves to go home safely—no operational metric is more important. When employees feel safe and supported speaking up, sharing ideas and asking for help without fear of reprisal, they are more engaged, innovative and adaptable to change. We incorporate safety into all we do, look out for each other's safety and speak up if we have safety concerns.

HOW WE STAY ROOTED IN INTEGRITY

We maintain health and safety in our workplaces when we:

- Do not take unnecessary risks in the workplace, or direct others to do so
- Follow all safety rules and procedures
- Stop work if we consider it unsafe and notify a People Leader
- Report unhealthy or unsafe working conditions, as well as hazards or damaged equipment
- Do not undertake a task unless we are trained, competent and fit to do so
- Never work under the influence of drugs or alcohol, and report those who do
- Know all emergency procedures and participate in safety trainings and drills
- Watch out for the well-being of our colleagues, visitors, contractors and other guests
- Facilitate and encourage everyone to speak up without fear of retaliation or ridicule
- Come to work well-rested and develop schedules that promote adequate rest prior to coming to work
- Monitor our psychological wellness and that of others and seek assistance when needed

Our Safety Questions

- Am I compromising my health, wellness or safety, or someone else's?
- Am I paying attention?
- Am I following the proper procedure?
- Am I taking the time to be safe?
- Has anything changed that I should consider?

Wellness at Mosaic

Live Well. Work Well.

Mosaic strives to always provide employees with a psychologically safe and healthy work environment. We are dedicated to supporting employees in overcoming barriers that interfere with their health both at work and at home. Employees are encouraged to manage their physical and psychological health to help support a safe work environment. The Mosaic wellness program includes resources to help employees manage their overall wellness, including physical, psychological and financial health.



LEARN MORE

[Environment, Health and Safety Policy](#)
[Employee Assistance Programs](#)



Q&A

Our Code in Action

Q: I'm an apprentice on a maintenance crew. Recently, while repairing machinery, the tech I was training with dropped a heavy tool that nearly hit my foot. He told me I didn't need to report it because no one was hurt. Was he right?

A: No. Our goal is zero harm to our people, and part of that is speaking up when something is unsafe. We should always report safety incidents, even near misses. Share your experience with your People Leader and EHS.

Fostering Diversity and Inclusion

Mosaic believes that a diverse and inclusive workforce makes our organization stronger, increases value and better enables us to fulfill our mission of helping the world grow the food it needs. We are committed to creating and cultivating an innovative and collaborative workplace that welcomes, values and respects diversity of people, thoughts and perspectives, a workplace free of discrimination and intolerant of bias. Our [Commitment to Inclusion](#) reinforces that Mosaic is focused on building a representative workforce that embraces the opportunities that diversity brings to the workplace.

HOW WE STAY ROOTED IN INTEGRITY

We foster and maintain a diverse and inclusive environment when we:

- Build our teams with diversity of thought, perspective, education and experience in mind
- Provide fair opportunities for all employees to contribute and participate
- Collaborate effectively by sharing information and seeking input from all team members
- Actively seek out different points of view to find solutions
- Speak out if we feel our views or the views of others are being disrespected or ignored
- Recognize where bias exists and take action to interrupt those biases
- Respect and welcome differing points of view and ideas
- Ensure all employees feel safe speaking up and bringing their whole selves to work



LEARN MORE

[Commitment to Inclusion](#)



To report suspected violations of the Code go to mosaic.ethicspoint.com



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Avoiding Bribery and Corruption

We succeed in business through excellence and innovation. Our business interactions always reflect our commitment to ethical conduct and compliance with anti-bribery and anti-corruption laws. Bribes, kickbacks and facilitation payments are all forms of corruption and are never permitted. Such practices are bad for business and can harm our reputation and our license to operate. They are also illegal in virtually every country and contrary to Mosaic principles.

HOW WE STAY ROOTED IN INTEGRITY

We avoid bribery and corruption when we:

- Never offer or make payments:
 - To improperly influence a business decision
 - To obtain or retain business
 - That could give Mosaic an improper business advantage
- Never offer or accept bribes, kickbacks or facilitating payments
- Only use third parties that have gone through and been approved through our third-party screening processes, and never use a third party to make a payment we wouldn't make ourselves
- Keep complete records of all payments with appropriate supporting documents
- Make all customs payments in accordance with local law, and never directly to government officials
- Report any potential improper payments immediately



LEARN MORE

[Worldwide Anti-Bribery and Anti-Corruption Policy](#)

Improper Payments

Improper payments can come in many forms, both cash and non-cash, including:

- **Bribes:** When something of value (cash or non-cash) is given to influence the recipient's actions (e.g., to obtain or keep business, gain a business advantage or affect a decision or approval)
- **Kickbacks:** Payments made for fostering an improper business relationship (e.g., compensating someone for choosing to do business with a company independent of a fair selection process)
- **Facilitation Payments:** Money paid to a government official to expedite a routine, non-discretionary government action, such as issuing a permit or approving the import/export of products

Government Officials

As a global company, our business at times involves government officials. Special care must be taken to ensure we maintain these relationships with integrity. A government official may be defined as any government employee, candidate for political or government office, member of a public international organization or political party, or employee of a business owned by a foreign government. Any close business associate or family member of such a person will also be deemed a risk. Sometimes these individuals are referred to as Politically Exposed Persons, or PEPs. We never give improper payments to or accept them from government officials or PEPs, even in countries where this may be customary. Even the appearance of corruption can harm our business.

Q&A

Our Code in Action

Q: I work in sales and procurement. My team is working on securing business with a government client in South America. We have been in discussions with government officials, and one member of our team has gotten friendly with one of the government officials. This team member learned that the government official's daughter has always wanted to visit Orlando, Florida. He suggested to me privately that we offer the government official an all-expenses-paid trip to Orlando for his daughter as a gesture of goodwill. It seems unethical to me. Wouldn't that basically be a bribe?

A: Yes, offering such a trip to a government official could be seen as a bribe. You are right to be concerned. Report the issue to your People Leader, the Law Department or the EthicsPoint Helpline.

Q: After years of planning, I'm finally ready to build my dream house. I got a quote from a local construction company that was a lot lower than quotes from other builders. When I spoke with the owner, he said it was a "Mosaic discount" and mentioned that I might put in a good word with Mosaic for a contract his company had recently bid on at my site. What should I do?

A: The unusually low bid on the house and the company owner's comments raise concerns that the company is trying to gain a business advantage through a bribe. Report your concern about this particular vendor to the Law Department for further review.



Following Trade Regulations and Sanction Laws

We provide product, directly and indirectly, to farmers in more than 40 countries around the world, so we are careful to comply with the laws that govern international trade, including economic sanctions, export controls and anti-boycott laws.

The United States and other jurisdictions in which we do business have economic sanctions programs and trade embargoes that limit or rule out our ability to do business in certain designated countries and regions and with certain designated individuals and companies. Similarly, export control laws regulate which products and technical information we are allowed to share, and with whom. Anti-boycott laws prohibit Mosaic from participating in or cooperating with boycotts that are not supported by the U.S. government and require us to report boycott-related requests we receive.

We expect everyone in our company to do their part to help us ensure we are complying with these international trade laws.

HOW WE STAY ROOTED IN INTEGRITY

We respect our obligation to comply with international trade laws when we:

- Follow all applicable laws and policies, and seek guidance when questions occur
- Require our business partners to share sufficient information for us to comply with applicable international trade laws, including information about their ownership, the origin of the products and services we buy from them, and the destination of the products we sell to them
- Do not participate in prohibited boycotts

If you receive a request to cooperate with a prohibited boycott, report the request to your People Leader and the Law Department immediately. The same applies if you receive a request to conduct business in an area or with a person or company in violation of applicable economic sanctions.



Employees Engaged in Sales or Located in Countries Affected by Sanctions

Only engage in transactions with third parties that have been screened in accordance with Mosaic's Worldwide Screening Policy. Check with the Law Department if you have questions.



LEARN MORE

[Worldwide Economic Sanctions Policy](#)

[Worldwide Screening Policy](#)



Q&A

Our Code in Action

Q: A trader recently let me know of a supply of ammonia that we can get at a great price. He plans to buy it from a company on the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) "Specifically Designated Nationals" list, which names parties sanctioned under U.S. law. I know we are not permitted to buy the ammonia from the sanctioned company, but we would not be buying it from them; we would be buying it from the trader. Is that allowed?

A: No. You cannot do something indirectly that you would not be able to do directly. OFAC sanctions generally prohibit transactions involving, directly or indirectly, a sanctioned individual or company, absent permission from OFAC.

Managing Business Partners

We want business partners who share our principles and values. This means they operate ethically, in compliance with all applicable laws and Mosaic's Business Partner Code of Conduct. To ensure we do not create unnecessary reputational or supply risks for Mosaic, we choose our suppliers and contractors carefully.

HOW WE STAY ROOTED IN INTEGRITY

We ethically manage third parties when we:

- Choose business partners based on objective criteria such as safety, quality, reliability and price
- Operate a fair and equitable procurement process
- Never offer or accept anything of value from a potential business partner during the selection process that could be seen to influence the decision
- Never work with business partners that share confidential information without appropriate agreements in place
- Conduct regular reviews of business partner relationships and performance
- Communicate honestly with business partners to resolve issues and collaborate openly toward solutions
- Ensure third parties show a commitment to ethical and lawful behavior by screening all third parties through our screening process
- Report any unethical or unlawful issues that may arise in dealings with third parties



LEARN MORE

[Worldwide Screening Policy](#)
[Business Partner Code of Conduct](#)

Screening Third Parties

We should carefully consider the qualifications and reputations of potential third-party business partners prior to establishing a relationship and throughout the life of the business relationship. This includes examining any unethical or unlawful practices, prior criminal conduct, history of fines or penalties, and other conduct that could affect Mosaic's reputation or disrupt our operations. Only with appropriate and reasonable due diligence can we better understand any risks posed by our business relationships and take steps to mitigate that risk.

Be aware of the following red flags when screening a third party:

- Background check reflects a flawed background or reputation
- Background check reveals possible involvement in money laundering or terrorist financing
- Sanctions screening reveals an associated economic sanction applicable to our business
- Transaction involves a country known for corrupt payments
- Agent was suggested by or has a relationship with a government official
- Agent objects to anti-bribery and anti-corruption compliance requirements
- Contract terms are unusual
- Agent requests to keep identity secret
- Commission is in cash or exceeds the customary rate
- Agent requests false invoices or facilitation payments
- Payment is in another party's name

Supporting Fair Trade

We earn business by creating value for our customers. We never seek unfair advantages in the marketplace. Fair competition and antitrust laws ensure a level playing field for all businesses, encouraging innovation and better products and services for all. We follow these laws wherever we do business. This protects our reputation and our competitive advantage.

HOW WE STAY ROOTED IN INTEGRITY

We support fair trade when we:

- Never discuss pricing, production, markets, customers or any other topics of a competitive nature with competitors
- Promptly report to the Law Department any attempts by competitors to enter into improper agreements
- Obtain competitive intelligence only through legal means and with public sources
- Never use our market position to prevent competition
- Always behave respectfully when dealing with customers, suppliers, and competitors
- Use caution when interacting with competitors to avoid even the appearance of anti-competitive behavior
- Respect competitors' intellectual property

Q&A

Our Code in Action

Q: I've been with Mosaic for four years. Recently I noticed an employee of one of our competitors at my daughter's soccer games. It turns out this competitor's daughter is on the same team as my daughter. In fact, the girls are becoming friends. I've been polite with the competitor, but I'm reluctant to talk at any length. Is it okay to discuss business operations with this person?

A: You should never discuss anything of a competitive nature with the employee of a competitor, even casually. This would include information about pricing, production and customers. You may speak with this person about your daughters' team and other everyday topics. If business ever comes up, though, politely decline to go into any detail. Excuse yourself from the conversation if the person discloses any competitive information and report the interaction to the Law Department.

Cultivating Honest Marketing Practices

When it comes to Mosaic's capabilities, we speak with integrity and conviction. When we are clear and truthful, we win the trust of our customers and business partners. We never market ourselves dishonestly because doing so diminishes trust and opportunity.

HOW WE STAY ROOTED IN INTEGRITY

We cultivate honest marketing practices when we:

- Never misrepresent our products and services
- Estimate delivery and implementation timelines as accurately as possible, based on known information
- Never make false claims or disparaging comments about competitors' products and services
- Never infringe on copyrights, logos or other intellectual property
- Ensure our advertisements are compliant with all laws and regulations
- Never give legal advice to customers and business partners





Our Community

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Engaging with the Community

Mosaic supports initiatives that strengthen communities, and we encourage our employees to get involved. We invest in the strength and vibrancy of our communities. As part of the global community, we want to be a trusted neighbor. Our ability to build relationships with our communities is critical to our long-term success.

HOW WE STAY ROOTED IN INTEGRITY

We best engage with our communities when we:

- Take into account their expectations and concerns, and respect their cultures and customs
- Promptly investigate community concerns and report results to stakeholders
- Encourage team members to contribute to volunteer or charitable organizations
- Ensure that our volunteer activities do not interfere with our work responsibilities
- Seek approval for volunteer activities or donations on behalf of Mosaic
- Respect employees' rights to freedom of association and collective bargaining



LEARN MORE

[Community Investment \(mosaicco.com\)](#)
[Employee Giving Program](#)



Making a Difference

The sustainability of our business and the communities where we operate are indelibly linked. Our people are part of many communities around the world, and they live, work and raise families in those places. Because of this, we strive to be a thoughtful and engaged neighbor that invests carefully and generously through long-term partnerships with organizations that are making a difference.

We are proud to support organizations and initiatives that create growth and have a lasting impact on our communities in three main focus areas: Food, Water and Local Community. Our support also includes investments to remove barriers and increase opportunities for underrepresented communities. Each year, we invest an average of \$15 million through philanthropic grant-making, employee matching opportunities, in-kind products and services contributions, and volunteerism, including pro-bono, skills-based technical assistance and functional-specific services.

Supporting Human Rights

As a signatory to the United Nations Global Compact, Mosaic is committed to respecting all internationally recognized human rights. We make reasonable efforts to identify and assess potential impacts on human rights within our global operations prior to entering business relationships or taking on new endeavors. Human trafficking, slavery and child labor have no place in our global community. We ensure that we safeguard human rights in all we do, and we expect the same from our business partners.

HOW WE STAY ROOTED IN INTEGRITY

We support human rights when we:

- Provide safe and proper working conditions, hours and wages to all employees and work to ensure our business partners provide the same
- Conduct due diligence to ensure our business partners are committed to supporting human rights
- Take action on any reports of human rights violations
- Never use child or prison labor, anywhere we do business
- Report to the Law Department any exploitive labor practices or violations of human rights we may discover



LEARN MORE

[Commitment to Human Rights](#)

[Letter of Support for United Nations Global Compact](#)



Promoting Environmental Responsibility

There is no denying that mining and fertilizer manufacturing are intensive endeavors. Resource extraction, consumption of materials, generation of emissions in operations, water use—these activities are all necessary to fulfill our mission to help the world grow the food it needs. We know that respect for the environment and those who rely on it is essential to the sustainability of our business. We conduct business in a sustainable, environmentally responsible manner, which means upholding rigorous environmental protection standards at all levels and acting as a good steward of resources in all our locations, at each step of the process.

HOW WE STAY ROOTED IN INTEGRITY

We promote environmental responsibility when we:

- Comply with all environmental regulations
- Stop any work that may cause an environmental incident
- Promptly report any spills or other environmental incidents to a People Leader and EHS
- Minimize our environmental footprint incrementally (e.g., through responsible transportation, sustainability targets and so on)
- Report our impacts through annual sustainability disclosures and other initiatives
- Follow all Mosaic plans and procedures for waste management and air and water emissions
- Follow all environmental laws, permits, policies and procedures in our workplaces



LEARN MORE

[Environment, Health and Safety Policy](#)
[Our Efforts to Combat Deforestation](#)
[Our Leadership on Climate Change](#)
[Commitment to Water Stewardship](#)
[Mosaic's ESG Performance Targets](#)

The background of the page is a large-scale industrial scene, likely a quarry or a large-scale construction site. It features massive concrete structures with a grid-like reinforcement pattern. In the lower-left foreground, two workers wearing high-visibility yellow safety jackets, white hard hats, and face masks are standing and looking towards the right. The overall color palette is a warm, monochromatic orange-brown.

Our Company

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Managing Conflicts of Interest

We make collaborative decisions that are in the best interests of Mosaic and strive to never allow our personal interests to affect our professional judgment. Objective business decisions are always the most effective business decisions. Even the appearance of a conflict of interest can compromise our reputation.

HOW WE STAY ROOTED IN INTEGRITY

We manage or avoid conflicts of interest by:

- Excusing ourselves from any decisions in which we may have, or appear to have, a personal interest
- Disclosing potential conflicts of interest using our Conflict of Interest Disclosure Form
- Remaining alert to situations in which a conflict of interest may arise



LEARN MORE

[Conflicts of Interest Policy](#)
[Conflict of Interest Disclosure Form](#)

Conflict of Interest

A conflict of interest exists when our personal interests are not in alignment with our duties at Mosaic. Such conflicts usually arise in connection with family and personal relationships, outside employment, outside activities, business opportunities and personal investments. Potential conflicts of interest include the following:

- Outside employment with a competitor
- Outside employment that may interfere with our duties at Mosaic
- Business relationships with family members, close friends or current or former romantic partners
- Supervising family members, close friends or current or former romantic partners at Mosaic
- Directing Mosaic business to family members, close friends or current or former romantic partners
- Serving as a director or member of an outside organization that may compete with Mosaic
- Using Mosaic assets to start or support another company
- Having a family member, close friend or current or former romantic partner with a significant financial stake (more than 5 percent) in a company seeking to do business with Mosaic

You may not be sure if a given situation creates a conflict of interest. Discuss your concerns with your People Leader or the Law Department. Having a conflict of interest is not necessarily a violation of the Code, but failing to disclose it is. You must disclose an actual or potential conflict of interest as soon as you become aware of it and no later than 5 working days afterward.

Q&A

Our Code in Action

Q: I've been with Mosaic for the past eight years. My sister-in-law is in sales, and she recently started a new job with a software company. She told me that her new company has some services that could really improve our business processes. Can I help her set up a sales meeting with Mosaic?

A: Because the offer is coming from a family member, you have a possible conflict of interest. You may tell your manager about your sister-in-law's company, but when you do so, discuss steps you will take to disclose your situation. Mosaic may have an interest in what your sister-in-law's company has to offer, but you must not be involved in any decisions regarding that company or its software services.

Q: I'm a Scout leader for my son's Cub Scout pack. The Scout families and leaders in our area have been talking about seeking sponsorship from a Mosaic vendor. This vendor could provide us with some of the supplies we need. I assume it would be okay for me to participate in seeking this sponsorship. I wouldn't be doing so as a Mosaic employee but as a Scout leader.

A: This is a potential conflict of interest. You might use your professional position with Mosaic to influence the vendor's decision. We avoid even the appearance of a conflict of interest, and we never do anything that could harm our reputation. Disclose your situation using the Conflict of Interest Disclosure Form. You will receive guidance from the Company.



Exchanging Gifts and Entertainment Responsibly

We build our business relationships with integrity. Though we may at times accept nominal gifts as part of doing business, we never give or receive inappropriate gifts. Gifts and entertainment may influence or appear to influence our business judgment. Because we make objective business decisions, we avoid even the appearance of unethical influence.

HOW WE STAY ROOTED IN INTEGRITY

We exchange gifts and entertainment responsibly when we:

- Never ask for gifts
- Never accept cash gifts or cash equivalents, including gift cards
- Only accept gifts and entertainment that are nominal in value and given infrequently
- Never accept gifts or entertainment from a supplier we are negotiating with
- Give gifts only for a proper business purpose, and never to influence a business decision
- Obtain approval for the gift with the Gifts and Entertainment Approval Form, and document it appropriately



LEARN MORE

[Global Gifts and Entertainment Policy](#)
[Gifts and Entertainment Approval Form](#)

If offered a gift or entertainment from a business partner, ask yourself:

- Does it have a clear business purpose?
- Is it consistent with customary business practices?
- Could it be perceived as a bribe?
- Could it affect, or appear to affect, business judgment?
- Would it create a sense of obligation?

Generally Acceptable Infrequent Gifts and Entertainment

- Token gifts (e.g., logoed pens, hats, etc.)
- Lunch at a moderately priced restaurant to discuss business
- A noncash gift worth \$50 or less
- An outing with a supplier worth \$100 or less
- Seasonal tradition-based gifts worth \$50 or less

Note that in some areas, advanced approval is required before accepting or giving any gift or outing.

Gifts and Entertainment That Should Never Be Accepted or Offered

- Travel and accommodation
- Anything of an inappropriate value
- Anything at an inappropriate venue
- Any courtesy offered regularly, such as a weekly lunch



Q&A

Our Code in Action

Q: Our location has been working with a local vendor for many years now. The vendor's representative and I have developed a very positive relationship. In fact, he knows that I love to go fishing, and we sometimes talk about the best spots to go. It turns out that this vendor is hosting a fishing competition for a local charity. The representative offered me free entrance into the competition and said he'd throw in a fishing rod to sweeten the deal. It's all for a good cause. Can I do it?

A: Accepting entrance into the fishing competition is probably okay. The fishing rod is likely to be considered an excessive gift and should not be accepted. Fill out a Gifts and Entertainment Approval Form and discuss the matter with HR or the Law Department.

Keeping Accurate Records

Our business and financial records tell us where we are and where we are going as a company. Complete, reliable and accurate records enable us to make the best business decisions and meet our regulatory obligations. We also maintain the confidence of our customers and business partners when our records are managed correctly.

HOW WE STAY ROOTED IN INTEGRITY

We ensure our records are accurate and complete when we:

- Prepare accurate records on a timely basis
- Disclose clear, truthful information
- Never falsify a record
- Ensure records are easy to access, organized and secure
- Document all transactions in our books and records
- Never set up cash funds or assets that are unrecorded
- Preserve records subject to a Hold Order
- Report any falsified or fraudulent records
- Promptly provide complete records for any auditing procedures
- Follow all internal control procedures and records retention schedules
- Comply with generally accepted accounting principles and all laws and regulations

Business Records

Business records can come in many forms. All the information Mosaic produces, including emails, direct messages and memos, are considered business records and are to be maintained and retained pursuant to our policies. Other examples include:

- Reports (e.g., environmental, financial and performance)
- Safety records
- Policies and procedures
- Production information
- Quality data
- Personnel files
- Regulatory filings
- Contracts



LEARN MORE

[Global Records and Information Management Policy](#)

[North America Travel & Expense Policy](#)

[Records and Information Hold Order Policy](#)

Q&A

Our Code in Action

Q: My People Leader recently asked me to clean out an old office to make way for a new hire. There are quite a few old files, both in the desk drawers and on the computer. Should I simply shred the files and wipe the computer's hard drive?

A: No. Ask your People Leader for guidance on records retention or consult our records retention policy and procedures. Consult IT on what to do with the hard drive. We always manage records according to our retention schedules. Once you have sorted the records and decided which need to be retained, you may dispose of the rest according to Mosaic procedures.

Q: I recently attended a conference in another state. My husband decided to join me on the last day, and then we turned it into a long weekend getaway. On that last night of the conference, just after he arrived, I took him out to dinner. We didn't have a lot of time because I had to get to one more meeting, so we went somewhere quick and inexpensive. I charged it to my Mosaic credit card. On the expense report, I said I had dinner with a colleague instead of my husband. Honestly, both meals cost less than if I had eaten on my own at a more expensive restaurant. Was this okay?

A: No. We always keep accurate records. By claiming you dined with a colleague instead of your husband, you falsified an expense report. You also violated our Travel and Expense Policy by using Mosaic funds to pay for a non-approved expense. Discuss with Shared Services how you can reimburse Mosaic for the expense and correct the report.



Managing Our Information

Our information and communications systems contain data about Mosaic and its global operations. This data can take many forms, including intellectual property (IP). Our data and information provide enormous value, helping us distinguish ourselves from our competitors and innovate new products. We always protect our information from theft, loss or misuse.

HOW WE STAY ROOTED IN INTEGRITY

We best manage our information when we:

- Keep all communications tools (e.g., computers and tablets) secure by logging out when finished working and using passwords
- Promptly report any loss or theft of Mosaic devices
- Never open suspicious links in emails or on websites
- Never share our passwords
- Never install software without prior authorization
- Promptly report breaches of our security systems or cybercrime
- Avoid working with Mosaic information where it can be seen by the public
- Never discuss confidential matters in public
- Never leave Mosaic electronic devices unattended in public
- Never use information without authorization, even if we have access
- Comply with all information security policies and procedures



LEARN MORE

[Information Security Policy](#)

[IT Personal Protection Data Policy](#)

Intellectual Property and Confidential and Proprietary Information

Mosaic produces a number of different kinds of confidential business information. These include:

- Proprietary information, such as product formulas and industrial designs
- Manufacturing processes and procurement information
- Non-public financial information, such as pricing and projections
- Information about potential mergers or divestitures
- Research and development ideas and information
- New product and marketing plans
- Customer and supplier lists

Data Privacy

Mosaic collects a lot of data in the course of doing business. Some of that data relates to our employees, such as benefits and payment information. Some data relates to our customers and business partners, such as contact and sales information. Though much of this data is stored electronically, physical files and papers may also contain sensitive data. We are all responsible for protecting this information. We never share private data except in accordance with our policies and procedures, and we follow all data privacy laws wherever we do business.



Q&A

Our Code in Action

Q: My team has been working for months on a new manufacturing process, and we just had a major breakthrough. I'm so excited that I want everyone to know. Can I share the news with my friends on social media?

A: You may express excitement about your work on social media. However, do not share any details about your new process. This is Mosaic proprietary information, and as such it is confidential. If you are unsure about what you can and cannot share on social media about your work at Mosaic, do not share anything at all. You may also talk to your People Leader or the Law Department for more guidance.



Protecting Our Assets

Our assets reflect the hard work of all our employees, and we are all responsible for taking care of them. We use our assets to complete our work and build our future. They are essential to how we innovate and collaborate, and they include physical property, tools and equipment, IT systems and data, and monetary funds. We always use all our assets with integrity.

HOW WE STAY ROOTED IN INTEGRITY

We protect our assets when we:

- Use our equipment and assets for their intended purpose only
- Ensure our assets are not damaged, misused, lost or stolen
- Handle Mosaic funds honestly and in accordance with policy
- Limit personal use of communications systems, including phone and email
- Never remove Mosaic assets for personal use
- Follow all security procedures in our workplaces, including locking doors and using passwords when assets are not being used
- Never allow unauthorized personnel into our workplaces or provide them with access to our systems
- Refuse to share passwords
- Report any misuse or abuse of our assets, as well as damage due to wear and tear
- Dispose of company assets only when authorized and in accordance with policy



LEARN MORE

Global Acceptable Use Policy



Mosaic Assets

Our assets come in many forms, including:

- **Physical assets**, such as office supplies, production equipment and raw materials, as well as our land, office buildings and production facilities
- **Information assets**, such as all data in our files and on our servers
- **Intangible assets**, such as our reputation, intellectual property and trade secrets
- **Financial assets**, such as Mosaic funds and anything that can be converted to money, including stocks and bonds



Q&A

Our Code in Action

Q: I don't have a lot of time to go shopping for my son's birthday present. Is it okay to use my work computer to do some online shopping during my lunch break?

A: Limited personal use of Mosaic communications systems is okay as long as it does not interfere with your job responsibilities. Be mindful about cyber security at all times and do not click on unknown links or visit suspicious sites. Keep in mind, also, that your use of Mosaic Internet is not private, and you should not have any expectation of privacy when using Mosaic equipment. Mosaic reserves the right to monitor and review information sent or received using company resources.

Communicating Responsibly

As a company, Mosaic speaks with one voice. Our customers, business partners and the general public deserve clear, consistent communications about our business. Though we cultivate numerous points of view as we collaborate internally, our reputation outwardly is best preserved by responsible messaging. By ensuring that our designated spokespersons speak on our behalf, we avoid spreading misinformation.

HOW WE STAY ROOTED IN INTEGRITY

We communicate responsibly when we:

- Direct all media inquiries to Public Affairs
- Never make public statements on Mosaic's behalf
- Politely refer all inquiries from investors to Investor Relations
- Contact the Law Department with any nonroutine government requests for confidential information or a subpoena



LEARN MORE

[Global Social Media Policy](#)

[Social Media Tips for Employees](#)

Using Social Media Responsibly

Social media can be a powerful way to share our lives and thoughts. However, it can also cause harm if misused. Anything we share about Mosaic on social media becomes public, so we must post carefully. Public Affairs manages all our official Mosaic social media accounts. When posting from your own social media accounts, remember the following:

- Never share sensitive or confidential information
- Always distinguish your opinions from those of Mosaic
- Be respectful, honest and informed
- Never allow your time on social media to interfere with your work
- Never make untruthful or disparaging remarks about Mosaic, our business partners, our customers or our competitors

Q&A

Our Code in Action

Q: After being hired a few years ago, I became friends with my manager on a social media platform. Recently, she started sending me inappropriate pictures via the platform's private messaging feature. I was completely shocked. I asked her politely to stop, but she has persisted. Though she treats me with respect at work, I have started to feel very uncomfortable around her. What should I do?

A: Your manager may be using social media to harass you. Contact Human Resources or use the EthicsPoint Helpline to report your situation. Though the behavior is happening on social media, it is affecting your work environment. We all have a right to be respected as Mosaic team members.

Participating in Politics Responsibly

We all benefit when we participate constructively in the political process. Fair and open societies thrive when everyone has a say. As a company, Mosaic follows all laws governing political contributions and lobbying activities. We believe in a just political process wherever we do business, and we always pursue our convictions with integrity.

HOW WE STAY ROOTED IN INTEGRITY

We participate in politics responsibly when we:

- Distinguish our own political views and activity from those of Mosaic
- Never distribute political materials at work, or pressure others to share our beliefs
- Never engage in offensive, harassing or threatening conversations or behavior that could affect our work environment
- Ensure we have Mosaic approval before making any political donations on Mosaic's behalf
- Participate in politics outside of work and at our own expense
- Inform our manager if we ever plan to run for office, or if a family member is a Politically Exposed Person (PEP)

As a company, Mosaic:

- Only engages in political activity through its political action committee
- Respects all employees' rights to free association and collective bargaining
- Never uses improper means to influence government agencies or representatives
- Makes all required public disclosures and reports related to lobbying activities



Q&A

Our Code in Action

Q: I am a strong supporter of a local candidate for our state legislature. I've actually been following her career for years, and I know she's perfect for our district. I think my team members might really like to learn more about her. Can I bring some pamphlets about her campaign into the office?

A: No. Though we support your right to be an advocate for your preferred candidates, we do not bring campaign materials into our workplaces. Political debates, while important, are best held outside of work.

Avoiding Insider Trading

We never use material, non-public information to buy or sell securities. As employees, we may at times become aware of “inside” information. We are always careful to protect this confidential information, whether it pertains to Mosaic, a business partner or a competitor. When such information is used for insider trading, it undermines confidence in the securities markets and could lead to severe penalties.

HOW WE STAY ROOTED IN INTEGRITY

We avoid insider trading when we:

- Never buy or sell securities if we have inside information
- Never disclose “tips” or other inside information to others
- Never discuss material, non-public information with co-workers unless they have a business need to know
- Report any leaks of material, non-public information
- Never try to manipulate the price of a security
- Only buy or sell securities within the defined trading window if we have been notified by the Law Department that we are on the Mosaic Securities Restricted Trading List



LEARN MORE

[Insider Trading and Tipping Policy](#)

Questions to Ask About Material, Non-Public Information

If you become aware of information that may be of interest to an investor, ask yourself:

- Has the information been disclosed to the public by press release or other means?
- Does the information make me want to buy or sell the company’s securities?
- If the information were published in the media, would it cause the price of the company’s securities to rise or fall?
- If a trade were made based on this information, how would the situation appear to government prosecutors?

Q&A

Our Code in Action

Q: I work in Finance and have heard talk in the department that Mosaic is considering an acquisition that will definitely impact our share price. Can I let some family members know so they can purchase shares in Mosaic or the to-be-acquired company? I wouldn’t be benefiting myself.

A: No. Because the deal is not known to the public and because it will be of interest to investors, this qualifies as material, non-public information. You should wait until the information has been made public before you or your family members trade in Mosaic or the acquired company’s stock. Contact the Law Department for more guidance.

Our Reporting Resources

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Resources are available to support you. For assistance or to report a concern, contact:

- **Human Resources / HR Connect:** 1-855-660-6947
For Human Resources issues
- **Law Department:** Law@mosaicco.com
For legal and regulatory issues, particularly in the event of a government inquiry or investigation
- **Internal Audit:** Robotics.InternalAudit@mosaicco.com
For financial and accounting issues, including misappropriation of assets
- **Investor Relations:** investor@mosaicco.com
For shareholder issues
- **Public Affairs:** public.affairs@mosaicco.com
For issues related to politics, charitable giving and media inquiries
- **Environmental, Health and Safety (EHS):** [My Mosaic](#)
For environmental, health and safety issues
- **Chair of the Audit Committee of the Board:** auditchair@mosaicco.com
For accounting and audit issues

To make a report through an independent third party, use the EthicsPoint Helpline. Although we encourage reporters to provide contact information so that we can investigate as thoroughly as possible, reports through the helpline can be anonymous. EthicsPoint is available on the Web at www.mosaic.ethicspoint.com or via phone:

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|----------------------------|---|
| • Australia: 1-800-290-653 | • Paraguay: 0098004410207 |
| • Brazil: 0800-892-0309 | • Peru: 0800-77-582 |
| • Canada: 1-877-261-2609 | • Saudi Arabia: 1-800-10, at the prompt dial 877-261-2609 |
| • China: 4006000859 | • United States: 1-877-261-2609 |
| • India: 000-800-040-2098 | |



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