Form **8937**(December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer		
1 Issuer's name		2 Issuer's employer identification number (EIN)
Potash Corporation of Saskatchewan Inc.		119482909
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact
Investor Relations	800.667.3930 (US) / 800.667.0403 (Canada)	investors@nutrien.com
6 Number and street (or P.O. box if mail is not		7 City, town, or post office, state, and ZIP code of contact
	,	
Suite 500, 122 1st Avenue South		Saskatoon, SK S7K 7G3
8 Date of action	9 Classification and description	
	_	
1/1/2018	Tax free reorganization	
10 CUSIP number 11 Serial number(s) 12 Ticker symbol	13 Account number(s)
73755L107 Part II Organizational Action Attac	IPOT ch additional statements if needed. See b	ack of form for additional questions
		gainst which shareholders' ownership is measured for
	t to a plan of reorganization within the meaning	
shareholders of Potash Corporation of Saskatchew		
		ash payment equal to the fair market value of the shares
		cholder, an unlimited liability company that is wholly
owned by Nutrien Ltd.	all, the issuer will amargamate with its sole share	moider, an unmitted naturity company that is whony
WHEN DY INDICATE THE		
15 Describe the quantitative effect of the orga	nizational action on the basis of the security in	the hands of a U.S. taxpayer as an adjustment per
	ne aggregate basis of former Issuer shareholders	
received remains the same as the aggregate basis of		
due to the number of shares received. The basis of	each Nutrien Ltd. share held by a former Issuer	shareholder
will be calculated by dividing the per share adjuste	d basis in an Issuer share, as of the date of the re	organization, by 0.40.
		·
16 Describe the calculation of the change in b	asis and the data that supports the calculation	, such as the market values of securities and the
•	Issuer shareholder in Nutrien Ltd. shares receive	
dividing the aggregate tax basis of Issuer shares sur		
The resulting amount represents the adjusted per s		

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Pa	aе	6

Part I		Organizational Action (continued)					
17 Lis	st the	applicable Internal Revenue Code section(s) and subsection(s) upon which the tax tre	eatment is based >	The tax free status of the		
reorgani	zation	and its impact on affected shareholders are	governed by IRC Sections 354(a), 358(a), an	d 368(a).			
		,					
					The state of the s		
40 0		was altimated to a second second by					
		resulting loss be recognized? ► No loss v					
		n disposition of the Nutrien Ltd. shares rece	ived by the shareholder. A loss may be recor	enized by a dissenting	g shareholder		
whose Is	suer s	nares were redeemed.					
		· · · · · · · · · · · · · · · · · · ·					
			9				
19 Pr	ovide	any other information necessary to implem	ent the adjustment such as the reportable	e tax vear > chance	aldone should consult their toy		
				Sharer	loiders should consult then tax		
advisors	if they	have questions regarding their use of the in	formation provided on this Form.				
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	Unde	r penalties of perjury, I declare that I have exam	ined this return, including accompanying sched	dules and statements.	and to the best of my knowledge and		
	belief	, it is true, correct, and complete. Declaration of	preparer (other than officer) is based on all infor	mation of which prepa	rer has any knowledge.		
Sign		- <i>U</i> 2,					
Here	Here \(\langle \langl						
	Signa	ture - I I I PACIA		Date Vuly	6,2010		
	Print	your name ► Annette Pilipiak	Propararia signatura	Title ► VP. Tax	DTA		
Paid		Print/Type preparer's name	Preparer's signature	Date	Check if PTIN		
Prepa	rer			1	self-employed		
Use C		Firm's name ▶			Firm's EIN ▶		
		Firm's address ▶			Phone no.		
Send Fo	rm 89	37 (including accompanying statements) to	o: Department of the Treasury, Internal Re	venue Service, Ogo	len, UT 84201-0054		