

California Transparency in Supply Chains 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: https://nutrien-prod-asset.s3.us-east-2.amazonaws.com/s3fs-public/uploads/2021-11/Nutrien_basic_COP_2020_final.pdf

Nutrien's Code of Conduct 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://nutrien-prod-asset.s3.us-east-2.amazonaws.com/s3fs-public/uploads/2022-01/Code%20of%20Conduct_ENG_2022_EXTERNAL.pdf. As part of the Code of Conduct we acknowledge "It is our responsibility to know our suppliers, customers and business partners. We 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 damaging the reputation of Nutrien."

Nutrien maintains an Integrity Helpline that is accessible throughout the world in all major languages 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 Helpline also provides anonymity where legally permissible. Nutrien employees are encouraged to raise concerns to their supervisors, any member of senior management, HR, Legal, or the Integrity Group, as well as to use the Helpline. All concerns raised are taken seriously and appropriately assessed and addressed. For those matters that are substantiated, discipline is determined on a case-by-case basis but can include punishment up to and including termination. Nutrien provides information about the nature of the concerns raised to the Integrity Group in its ESG Report.

2. Training

All employees, including management, are trained on Nutrien's Code of Conduct and strategic risks on an annual basis. The standard Code of Conduct training for Nutrien includes certifications of past and future compliance with the Code of Conduct. Refresher training in these areas is mandatory for all Nutrien employees in modules that highlight different aspects of our Code of Conduct each year. Nutrien annually discloses in its ESG Report the number of employees that received training related to the Code of Conduct, as well as topics like anticorruption, and competition law. For those working in higher risk supply chain roles, employees are further educated about risks identified through our supply chain due diligence that may include human rights abuses such as forced labour, child labour, or any other risk discovered.

3. Verification

In addition to the Code of Conduct for our employees, Nutrien has a [Supplier Code of Ethics](#). The Supplier Code of Ethics identifies those principles that Nutrien believes are important for ensuring that we do business with people that share our commitment to integrity. The Supplier Code of Ethics sets out requirements in terms of human rights and other social as well as environmental sustainability 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 ensuring we do business with responsible partners, Nutrien has an internal due diligence process leveraging external data sources developed to evaluate potential suppliers for the issues outlined in its Supplier Code of Ethics. This process uses a risk-based approach to ensure we conduct the appropriate level of review.

4. Certification

Nutrien seeks contractual commitments from its suppliers to comply with the Supplier Code of Ethics. In the event suppliers fail to follow the principles of our Supplier Code of Ethics or show signs that they are not committed to improving their practices to sufficiently demonstrate their ability to comply, Nutrien will reconsider its relationship with the supplier, which may include termination of our relationship with the noncompliant supplier.

5. Audits

As part of holding suppliers accountable for the expectations set forth in the Supplier Code of Ethics, Nutrien conducts audits of suppliers in a risk-based manner. These audits (both announced and unannounced) use independent external experts and/or internal experts and cover a wide range of areas, including human rights issues such as child and forced labour.