

# Code of Business Conduct and Ethics





# A Message from Joc O'Rourke

I'm proud of the respect and trust we've earned since Mosaic was formed in 2004. Our excellent reputation reflects the actions of our 9,000 employees, and it is an essential asset as we grow our position as the world's leading crop nutrition company.

Protecting and strengthening our reputation requires each of us to adhere to the highest ethical standards in all that we do. The Code of Business Conduct and Ethics exists to guide us. It defines the way we do business, and it supports our values of integrity, excellence, sustainability and connectivity.

Each of us is responsible for knowing and understanding the code, and applying it without exception. Expectations are straightforward: be accountable, speak up, use good judgment and ask questions.

Thank you for your ongoing commitment to act according to our code. Mosaic, our employees, our communities and our shareholders benefit when we make good decisions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joc O'Rourke'.

Joc O'Rourke  
President and Chief Executive Officer

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# Our Principles



## OUR PRINCIPLES

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# WE ARE RESPONSIBLE, INNOVATIVE, COLLABORATIVE & DRIVEN.

We are accountable for the safety and wellbeing of our colleagues and our company.

We act with integrity and conviction. We are careful stewards of natural resources.

We foster innovation and encourage ideas that make us better. We collaborate across departments and geographies to accelerate our performance. We strive to achieve excellence knowing that we can always improve.

**Together, we are driven to succeed.**

In a rapidly changing global business environment, it is important for us to remain grounded and focused on what we agree is most important.

The Code contains detailed standards covering particular business situations and risks. These standards align with our principles and provide further examples of how we make sure we always do the right thing.



# Introduction





At Mosaic, our principles define us and how we do business. They guide the way that we think and act; they are what Mosaic stands for and what we are about; and they make us a stronger company.

Our principles also form the basis of our Code of Business Conduct and Ethics (the “Code”). When rules are unclear, apparently in conflict, or simply don’t exist for the situation confronting us, we must rely on guidance that brings consistency and good judgment to our decisions. Our Code, together with our principles, helps us do this.

Our Code provides guidance for making the right choices. It also provides resources to help you act honestly, with integrity and in compliance with the laws and regulations that apply to our business. Our policies, which you will find referenced throughout the Code, provide additional information about specific topics.

The Code applies to all employees, officers and directors of Mosaic and its affiliates. Individuals who violate the standards in this Code, or who make false certifications regarding their compliance with the Code, will be subject to appropriate, case-specific disciplinary action, which may include termination of employment. We expect everyone who conducts business on behalf of our Company, including agents and contractors, to follow the principles described in the Code.



## KNOW THE CODE

- Familiarize yourself with the values and standards set out in this Code and follow them at all times.
- Comply with all laws and regulations in the performance of your job responsibilities.
- Be alert for situations which could lead to inappropriate business conduct and take steps to avoid putting oneself and Mosaic in those situations
- If you have any business concerns, let your People Leader or Mosaic’s Law Department know, especially if you see or suspect misconduct; or you can file a report through the Ethics Line.

To help you consider the options carefully and make the right choice,  
**ASK YOURSELF THE FOLLOWING QUESTIONS:**

### What's at Stake Here?

- Does the concern or issue raise questions about a legal obligation, fairness, honesty, or avoid doing the right thing?
- What specifically am I being asked to do, and are my concerns based on the facts? Make sure you have all the facts. Could a wrong decision harm Mosaic's reputation?

### Is the Situation Covered by the Code, a Mosaic Policy or Other Rule?

- If a situation or course of action would violate a law, policy or other rule, stop and seek assistance immediately.
- If there isn't a rule or policy, or they are unclear, which course of action best honors Mosaic's Core Values?
- Is making the decision consistent with my job responsibilities or should I seek guidance from my People Leader?

### Who Else Matters?

- Who is, or could be, affected by the decision I make?
- Should I consult those affected?
- What could be the consequences of the decision?

### What Do Others Think and How Can Others Help?

- Who can I ask for advice and what can I learn from those who have a different perspective?
- Have my co-workers faced the same issue?
- Can my People Leader guide me?
- Do I need to raise the issue with a senior manager or a member of Mosaic's Law Department?

### What's My Gut Telling Me?

- If something seems unethical or improper, it is worth a closer look.
- How can I best show good judgment and common sense?



We make choices all the time. Doing the right thing is about making the right ones. Many decisions are a routine part of our jobs, but sometimes we face situations where the choices are difficult or troubling.



## Asking for Help and Raising Concerns

We are all responsible for ensuring that Mosaic achieves its business goals in the right way, avoiding unnecessary risks and preserving its reputation. Every single one of us – regardless of our role or seniority – has a personal responsibility to ask questions, raise concerns and report misconduct. Mosaic is committed to fostering an environment where everyone feels comfortable and supported to always do the right thing.

If you are faced with a situation or issue which is, or may, be a violation of the Code or might otherwise be unethical, inappropriate or illegal, you must take the appropriate steps to address it, seeking the help of others where necessary. Guidance and support is always available from a number of sources, as detailed below.

### LOCAL RESOURCES

In many cases, when we are unclear about the best course of action, or when something doesn't seem right, we can better understand and even resolve the situation by speaking directly and honestly with co-workers and People Leaders. Your local Human Resources representative can also assist.

### CORPORATE RESOURCES

If you do not feel comfortable approaching your People Leader with your question, please discuss the issue with your local Human Resources representative, the Vice President of your functional organization, Mosaic's Chief Compliance Officer, a member of Mosaic's Law Department or the Company's Senior Vice President – Human Resources.

### MOSAIC'S ETHICS LINE

You also have the option to report the incident or issue, on an anonymous basis if desired, through EthicsPoint, which is available via the Internet at [www.mosaic.ethicspoint.com](http://www.mosaic.ethicspoint.com) or via phone:

U.S. and Canada: 1-877-261-2609

Chile: 1230-020-5771

Brazil: 0800-891-1667

India: 000-800-100-1071

Argentina: 0-800-444-8084

China: 10-800-712-1239

### RESOURCES FOR ACCOUNTING AND AUDITING MATTERS

Concerns regarding questionable accounting or auditing matters (such as fraud in the preparation or review of our financial records or internal control deficiencies, for example) may also be submitted, on a confidential and anonymous basis, to the Chairman of the Audit Committee of the Company's Board of Directors via e-mail at [auditchair@mosaicco.com](mailto:auditchair@mosaicco.com)

## Non-Retaliation

Seeking help or raising concerns is not always easy – sometimes it even takes courage. Anyone looking for help to raise a concern, or report misconduct should feel supported and not afraid of retaliation. Mosaic does not tolerate any form of retaliation, whether direct or indirect, against an employee who, in good faith, reports a concern or wrongdoing, or cooperates with an investigation concerning any business conduct or ethics-related issue. Any person found to have retaliated against an employee under these circumstances will be subject to disciplinary action, up to and including termination of employment.

*Mosaic does not tolerate any form of retaliation, whether direct or indirect, against an employee who, in good faith, reports a concern or wrongdoing, or cooperates with an investigation concerning any business conduct or ethics-related issue.*

While Mosaic encourages an atmosphere of openness and transparency, we recognize people will sometimes wish to raise their concerns or seek help in confidence or anonymously. If you wish to keep your identity and the information you share confidential, Mosaic will take steps to protect your anonymity to the fullest extent possible. All concerns will be promptly investigated, and the investigation will be kept confidential to the extent that only those parties who have a definite need to know be involved to investigate and rectify the issue.

All reports of misconduct should be made in good faith, when you believe the information you are providing is truthful. Like any other misconduct, intentionally filing false or misleading reports will result in disciplinary action, up to and including termination of employment.

## Q & A

**Q:** What can I expect if I report a concern regarding ethical misconduct?

**A:** Mosaic's management team is committed to investigating and taking corrective action whenever appropriate.

No matter which resource you use, Mosaic takes all requests for help and reports of alleged misconduct seriously. Your issue will be handled promptly, professionally and with the highest degree of confidentiality possible. If you choose to file a report anonymously through EthicsPoint, you will be given a case reference number so that you can check back periodically on the actions related to your report, or respond to any requests for additional information by those responsible for investigating the matter.

## KNOW THE CODE

- Report all concerns regarding ethical misconduct.
- Ask questions whenever you have concerns and don't know the right thing to do.
- Familiarize yourself with Mosaic's resources for reporting concerns.
- Speak up if you ever witness or experience any form of retaliation.







We Demonstrate Integrity By:



## Promoting a Safe and Healthy Workplace

Mosaic is committed to preserving a safe and healthy work environment. We are on the relentless pursuit of an injury-free workplace. We will not compromise the safety and health of our employees or of others working on our premises. We will always take the appropriate precautions to provide workplaces that are safe and secure. We consider even one injury to be one too many and we work hard to deliver great safety performance.

Mosaic requires all employees to help ensure the personal safety and wellbeing of themselves and others. Safe operations depend not only on technically sound facilities and equipment, but also on competent people and a strong commitment to safety. This requires that you always be aware of your surroundings and understand the rules and procedures that apply to your operations. If you ever feel that something is unsafe, or that you are not qualified, trained or able to complete an assigned task, you should stop work and notify your People Leader or a member of the Environmental Health Safety & Security team immediately. For more information please review our [Environmental Health and Safety policy](#).

*It is never acceptable to:*

- Undertake work when impaired by alcohol or drugs, whether legal or illegal, prescribed or otherwise.
- Possess, use or transfer illegal drugs or other controlled substances on Mosaic's property or while engaging in Mosaic business.
- Bring weapons onto Mosaic's premises (except in rare cases – see [Mosaic's Global Weapons, Firearms and Explosives policy](#)).
- Fail to report a health or safety concern on the assumption that someone else will do so.



## DEMONSTRATING INTEGRITY... WHEN WITNESSING A SAFETY ISSUE

Last week, I noticed that a co-worker was acting a little strange. I tried not to think too much of it, but then earlier this week I noticed that she smelled a bit like alcohol. I really did not want to get her in trouble because I know she's been having some problems at home, but I knew that if she was coming to work smelling like alcohol, there was a chance she could hurt herself or someone else. Even though it was a tough thing to do, I shared my concerns with my People Leader. I'm relieved to know that no one was hurt, and hope that my co-worker will seek help from Mosaic's Employee Assistance Program, if appropriate.

## KNOW THE CODE

- Remember that no activity is so important that it cannot be done safely.
- Comply with all health and safety policies and procedures applicable at our work locations, including relevant standards, instructions and processes.
- Stop doing any work as soon as it becomes unsafe.
- Only perform work you are trained, competent and medically fit for.
- Report any accident, injury, illness, near miss, unsafe or unhealthy condition to your People Leader.
- Be familiar with emergency procedures.

## Preventing Bribery and Corruption

Mosaic complies with all applicable laws of the U.S. and other countries in which we do business that are designed to prevent bribery and corruption, especially the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Anti-Bribery Act. The FCPA prohibits offering bribes to government officials outside the U.S. The UK Anti-Bribery Act specifically prohibits bribes in all aspects of commercial business.

At Mosaic, our [World Wide Anti-Corruption Policy](#) states that we should never offer, make, or authorize payment of money or anything of value to influence the behavior of a government or business representative to obtain a commercial advantage, no matter where we are located and no matter what the local culture might dictate. We will also refuse to accept bribes or other improper payments, including kickbacks.

## PAYMENTS TO CONTRACTORS

Employees responsible for hiring or paying contractors (including agents, representatives and consultants) outside the U.S. must take particular care to avoid improper payments. Bribery and corruption are serious crimes, and the penalties for committing them can be very severe. Mosaic must avoid even the appearance of improper business interactions with government officials or business partners.

Before entering into a contract with a non-U.S. party, you should review the contract with Mosaic’s Law Department and consult the [World Wide Anti-Corruption Policy](#) for additional information.

## KNOW THE CODE

- Avoid bribery at all costs, whether working with government officials or any other commercial party
- Be diligent when hiring and working with agents.
- Properly record all payment in Mosaic’s books and records.



## Q & A

**Q:** What do I need to know if I am working with agents or foreign officials outside of the United States and need to make payments in the course of that business?

**A:** When you make payments in the course of doing business internationally, you are responsible for ensuring they:

1. Are made to legitimate providers of goods or services;
2. Reflect the value of what is actually provided;
3. Are for a proper business purpose; and
4. Comply with U.S. laws and the laws of other countries where we do business.

You must also ensure that:

- You never provide payments that you suspect may be passed to officials outside the U.S. or to others in order to influence decision-making in Mosaic’s favor.
- You never use an agent to make any payment that Mosaic itself cannot make.
- All payments are properly recorded in Mosaic’s books and records with appropriate supporting documentation.



## Acting Responsibly When Exchanging Gifts and Entertainment

We do not give or receive inappropriate gifts or entertainment. In many cultures, gifts and entertainment are an integral part of doing business because they can foster goodwill and enhance business relationships. But some gifts and entertainment can create improper influence or the appearance of improper influence leading to a potential conflict of interest. For this reason, we must never offer or accept gifts or entertainment intended to influence decision-making, regardless of value.

Here are some important general guidelines:

You **MAY** exchange gifts and invitations for business entertainment which are:

- of minimal value; and
- consistent with customary business practice.

You must **NEVER** exchange gifts or invitations for business entertainment which:

- are in the form of cash or cash equivalent (such as a gift card);
- may be construed as a bribe or payoff;
- will violate laws, regulations, [Mosaic's Gift and Entertainment policies](#) including Mosaic's Customer / Vendor Entertainment and Gift Policy or Mosaic's Country-Specific Entertainment and Gift Policies or the recipient's Gift and Entertainment policy; or
- reflect poorly on Mosaic.

If you are unsure whether a gift or entertainment is acceptable, you should consult with Mosaic's Law Department.

## Q & A

**Q:** A group representing a customer is visiting our production facility to do a site tour and discuss manufacturing a new product. We intend to provide meals and entertainment for the visitors, including a city bus tour, during the visit. Will this violate the Code?

**A:** No, provided that the meals and entertainment are reasonable, consistent with customary business practices, could not be construed as any sort of bribe or payoff, and comply with applicable laws. Mosaic recognizes that entertaining customers in accordance with our entertainment policies assists in building business relationships; however, we must avoid lavish entertainment activities or activities of such value that they place customers and Mosaic in an uncomfortable or compromising position.

### DEMONSTRATING INTEGRITY... BY REFUSING TO ACCEPT TICKETS

I was recently offered tickets to a sold-out concert by one of the suppliers bidding on a proposal I was working on. It was one of my favorite bands and I was really tempted to accept the tickets, but I knew how expensive they were and I wasn't sure if my contact was looking for something in return. Instead, I politely declined the tickets and then informed my People Leader about my actions. She agreed that the value of the tickets was higher than what would be appropriate under our policy, especially since we were in a bid situation. She seemed pleased by my actions and was really appreciative of my disclosure. It made me feel good about my decision.

### KNOW THE CODE

- Never exchange gifts or entertainment in an attempt to unfairly influence a business decision.
- Consult Mosaic's [Gift & Entertainment policy](#), [Worldwide Anti-Corruption policy](#), or ask a question if you are unsure of whether or not it is appropriate to give or receive a gift.



## Avoiding and Disclosing Actual or Potential Conflicts of Interest

Conflicts of interest can occur when our personal interests influence our ability to make sound, impartial and objective decisions on behalf of Mosaic. To ensure that we act in Mosaic's best interests, we must disclose all conflicts of interest or potential conflicts of interest as soon as we're aware of them. Although this Code cannot possibly detail all potential conflicts of interest, this section will help you understand where conflicts can arise, when to disclose them and how to avoid them.

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*To ensure that we act in Mosaic's best interests, we must disclose all conflicts of interest or potential conflicts of interest as soon as we're aware of them.*

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## PERSONAL CONFLICTS OF INTEREST

You may not supervise anyone with whom you have a close personal relationship, such as a family or household member, or current or former romantic partner.

You may not participate in the selection process for, or supervise Mosaic's relationship with, a company doing business with Mosaic if it employs someone with whom you have a close personal relationship.

If you supervise someone, even indirectly, with whom you have one of the relationships described above, or have such a relationship with a company doing business with Mosaic, you must disclose the relationship as soon as you become aware of it.

## DEMONSTRATING INTEGRITY... WHEN TRYING TO HELP OUT

My brother in law contacted me today because he saw a posting for a job at Mosaic. He asked if I would pass along his resume. I looked at the position and realized that if he was hired, he would become my People Leader's boss. I knew that being in a reporting relationship with a family member could create a conflict of interest, so I was not sure how to proceed. I talked to my People Leader about the situation and he advised that I could still feel free to forward the resume on behalf of my brother in law to Human Resources, and that he would make a note about the family relationship. He said that sometimes disclosing potential conflicts of interest helps us avoid them, and that there may be a way my brother-in law could still be a candidate if the position was re-structured. I feel like I did the right thing by asking the question and did not disregard a potentially good candidate!



## PERSONAL OR FAMILY FINANCIAL INTERESTS IN COMPETITORS, CUSTOMERS OR SUPPLIERS

If you or any immediate family member has a financial interest with a competitor, customer or supplier of Mosaic, you should disclose this to a member of Mosaic's Law Department. If you, a family member or someone with whom you have a close personal relationship owns securities in publicly traded companies who compete with Mosaic, this does not constitute a violation of this Code, provided that you do not buy or sell securities in such companies based on material, non-public information.

## OUTSIDE EMPLOYMENT

You may not accept outside employment with Mosaic's competitors, customers or suppliers, or provide them with services or products on a self-employed basis. Employment with, or serving organizations or persons who are not Mosaic's competitors, customers or suppliers may be acceptable but you should first check with your People Leader or Mosaic's Law Department.

Even when outside employment is approved, it must never interfere with your responsibilities at Mosaic.

## SERVICE IN OTHER ORGANIZATIONS

Serving as a director, officer or other member of an outside organization (whether for-profit or not-for-profit) may create a conflict of interest even if you do not receive compensation for your services. You should seek guidance from your People Leader and from the Mosaic's Law Department before accepting such an appointment.

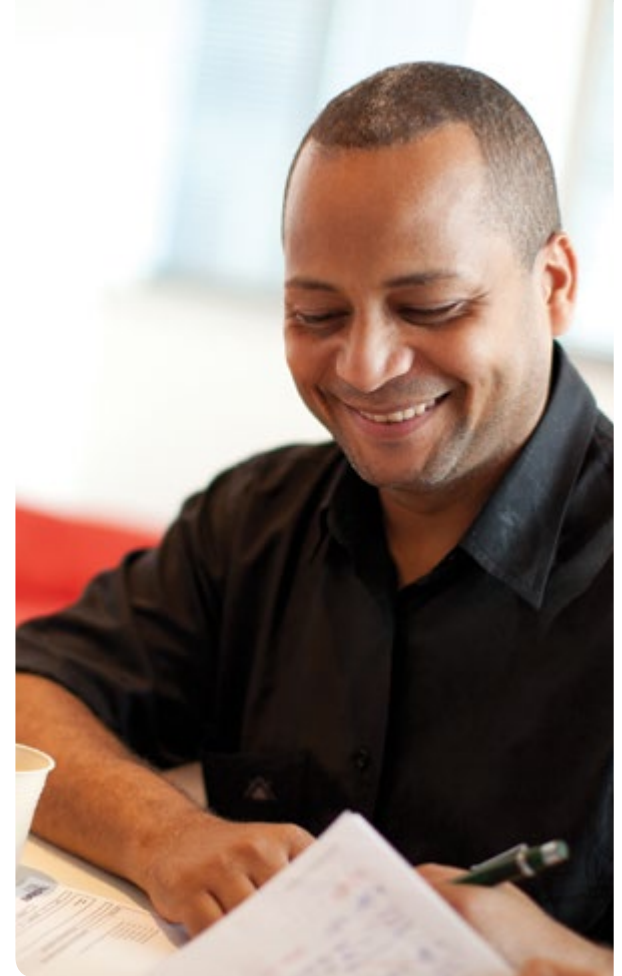
## CORPORATE OPPORTUNITIES

If you become aware of a business opportunity that Mosaic may have an interest in pursuing, you must not divert that opportunity for your own personal gain or for the benefit of another company.

## LOANS

Personal loans to any executive officer of Mosaic (as defined by securities law) are unlawful and strictly prohibited. Personal loans to any other employee must be approved in advance by Human Resources and be in accordance with an approved Mosaic program. Loans between employees who are in a direct or indirect reporting relationship are prohibited.

**If you become aware of a conflict of interest or a potential conflict of interest, you must report it to a member of Mosaic's Law Department.**



## KNOW THE CODE

- Understand different types of conflicts of interest that could happen in a business setting.
- Disclose all conflicts of interest or potential conflicts of interest to your People Leader or a member of Mosaic's Law Department
- Never allow your personal interests to interfere with the decisions you make on behalf of Mosaic.
- Ask questions and seek guidance if you are ever unsure if an activity is permitted by this Code or Mosaic's policies.



## Complying with International Trade Controls, Import and Export laws

As a global company, we are responsible for knowing and complying with laws that relate to international trade.

International trade laws are complicated and change frequently. Penalties for violations can be severe, including fines, revocation of permits and imprisonment.

If you are involved with the sale, marketing, distribution or transportation of materials across international borders, you must comply with applicable laws, the provisions of this Code and Company policies related to international trade restrictions.

This section will help you recognize potential dangers and know when to seek guidance.

## IMPORT AND EXPORT CONTROLS

Mosaic's operations worldwide must be in compliance with all applicable U.S. and local import and export control laws. We must not import or otherwise deal with goods originating from a country subject to U.S. government trade sanctions.

Employees involved with importing goods must ensure that all import documentation is accurate and complies with applicable laws and regulations. If it is Mosaic's responsibility to do so, we must ensure that items being imported are correctly described and valued.

Many countries have laws restricting the export of goods and technology, and other dealings with certain states, entities and individuals. The United States has controls which restrict the export of certain products, services, technical data and software to other countries, as well as the re-export of those items from one non-U.S. destination to another.

Import and export controls can be complex. If you are uncertain as to whether a particular restriction applies, you should seek guidance from Mosaic's Law Department.

*If you are uncertain as to whether a particular restriction applies, you should seek guidance from Mosaic's Law Department.*

## KNOW THE CODE

- Understand which international trade controls apply to your job responsibilities.
- Contact Mosaic's Law Department if you have any questions related to international trade controls.
- Follow the Export/Import laws applicable to the country and the product or service traded.



## ECONOMIC SANCTIONS AND EMBARGOES

The U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") administers economic sanctions and trade embargoes against targeted non-U.S. countries and regimes, terrorism-sponsoring organizations, international narcotics traffickers and others in order to protect U.S. national security, foreign policy or economic interests.

All U.S. persons and corporations must comply with OFAC regulations and there are significant civil and criminal penalties for violations.

If you have any doubt about whether a business relationship or transaction is acceptable, you must seek guidance from Mosaic's Law Department.

## BOYCOTTS

Mosaic does not participate in boycotts of countries, their nationals or blacklisted companies, unless these boycotts are endorsed by the U.S. government and Mosaic's participation in this boycott is approved by Mosaic's Law Department.

If you receive requests from customers, suppliers, or others for Mosaic to participate in a boycott, or any inquiry about Mosaic's position on a particular boycott, you should contact Mosaic's Law Department immediately.





# We Achieve Excellence By:





## Developing the Best Products

### PRODUCT QUALITY

It is our responsibility to understand and satisfy our customers' requirements for quality products while always maintaining high ethical standards and complying with laws and regulations.

We must design, manufacture and distribute our products consistent with obligations to customers and in accordance with applicable standards and laws.

If you are involved in the inspection or testing of our products, you must ensure that all procedures and documentation are in accordance with Mosaic's policies and applicable regulations.

### PRODUCT SAFETY

To maintain Mosaic's reputation, and instill confidence in our products, we meet or exceed legal requirements applying to the safety of our products.

Employees involved in the management or handling of raw materials, production processes or finished products must comply with company policy and product safety procedures to prevent contamination, deterioration or inappropriate alteration of materials.



## KNOW THE CODE

- Comply with all quality and safety regulations.
- Immediately report concerns to Mosaic's Global Quality Assurance Manager or another appropriate company resource

## Serving our Customers

We go beyond lab coats to find new ways to serve our customers. Keeping our promises from Mine to Market is our way to earn customers' trust.

No matter what role you play at Mosaic, you can affect how our customers feel about our company. It is your responsibility to avoid doing or saying anything that could negatively affect Mosaic's reputation.

We must protect customers' confidential information, and you may only disclose it when allowed and as required by law.

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*Keeping our promises from  
Mine to Market is our way to earn  
customers' trust.*

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## Choosing the Right Partners and Promoting our Business Conduct Standards

Mosaic's success is rooted in our commitment to high quality products supported by strong supplier relationships. We foster supplier relationships based on trust, fairness and mutual respect. We hold our suppliers, their employees and subcontractors to the same high standards of business integrity to which we hold ourselves.

### SELECTION OF SUPPLIERS

Mosaic seeks to do business only with suppliers who operate ethically, in compliance with applicable laws, and otherwise in a manner consistent with the standards of this Code. The process for selecting suppliers must be objective, fair and based on Mosaic's best interests.

### ACHIEVING EXCELLENCE... BY PROTECTING CONFIDENTIAL INFORMATION

I was the first to arrive for a meeting in a conference room when I noticed a folder that was left behind from a previous meeting. When I opened it to find out who it belonged to, I saw it contained financial data for a company we were hoping to secure as a customer. Even though I knew this information would be helpful to my People Leader, I immediately brought the folder to the Law Department and explained the situation. It turned out that the information was extremely confidential and by turning it in to Mosaic's Law Department it saved some of my co-workers from getting in a lot of trouble.

## KNOW THE CODE

- Deal fairly and honestly with customers.
- Keep your commitments to customers.
- Act with integrity and be accountable to our customers.
- Seek to exceed customer expectations.
- Protect all customer confidential information.



In choosing among competing suppliers, you must impartially select those who best meet Mosaic's business needs, based on objective criteria such as quality, price, service, reliability, availability, technical excellence and delivery.

## FAIR AND TRANSPARENT DEALINGS

Mosaic treats all of our suppliers with fairness and integrity, regardless of the value of the transaction or the length of the relationship.

We must communicate honestly and openly with suppliers, seeking to understand problems when they arise and working collaboratively to find mutually satisfactory solutions. For the sake of protecting Mosaic's reputation and promoting a strong, dependable supply chain, we expect our suppliers to follow the standards of our Code.

## Outperforming our Competitors Fairly and Honestly

We seek to outperform our competition fairly and honestly, achieving competitive advantages through superior performance and never through unethical or illegal business practices.

Mosaic complies with the laws that govern the way companies compete, known as Antitrust laws in the United States and Competition laws in Europe and elsewhere. These laws are intended to promote and preserve a competitive global marketplace and, although they differ from country to country, this means we must be especially careful in:

- how we interact with our competitors; and
- how our behavior could improperly influence the competitiveness of our markets.

## ACHIEVING EXCELLENCE... BY TREATING SUPPLIERS FAIRLY

While I was finalizing my supplier selection process, I narrowed the list down to two contenders. When I communicated to each of my suppliers that they were one of two finalists, one supplier asked me to provide a "ball park" of the competing bid price. Although I knew that sharing this information could force my preferred supplier to come down in price, I politely declined to provide this information. I am glad I acted this way as sharing this type of confidential third party information would not have been appropriate.



## KNOW THE CODE

- Follow Mosaic's Supplier Code of Business Conduct and Ethics when dealing with suppliers.
- Be diligent and fair when selecting suppliers.
- Treat suppliers with integrity and professionalism.
- Help suppliers understand our compliance and ethics requirements.
- Be alert to and report to your People Leader any conduct by a supplier, its employees or subcontractors that appears to be inconsistent with the standards of this Code.



## DEALINGS WITH COMPETITORS

We will never enter into formal or informal agreements with competitors that limit trade or exclude competitors from the marketplace.

*You must never:*

- Make any agreement with a competitor about prices, or set prices in consultation with a competitor.
- Make any agreement with a competitor about the quantity or type of products we will sell or produce.
- Agree with a competitor to divide markets, or communicate with competitors about the places or customers for which they or Mosaic are competing.
- Agree with a competitor to set the terms or fix the outcome of a bidding process, nor should you discuss bids with competitors.
- Agree with others not to deal with another person or business.



## IMPROPER MARKET INFLUENCE

We will succeed in the marketplace on our own merits, and will avoid conduct or statements in relation to our competitors that violate either the letter or the spirit of the antitrust or competition laws.

*You must never:*

- Make false or misleading statements about our competitors.
- Induce suppliers or customers to break their contracts with our competitors.
- Take advantage of anyone, including competitors, through unfair dealing, such as manipulating information or failing to tell the truth.

The antitrust and competition laws are complex; violations have serious consequences such as significant fines and even imprisonment. If you have a question about whether an activity is acceptable, or if you are concerned about possible misconduct, you must contact Mosaic's Law Department.

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*If you have a question about whether an activity is acceptable, or if you are concerned about possible misconduct, you must contact Mosaic's Law Department.*

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## ACHIEVING EXCELLENCE...

### BY SEEKING GUIDANCE WHEN I HAD CONCERNS

While at a recent trade conference, I met a sales manager from one of our competitors who was quite chatty and kept trying to steer the conversation around pricing and opportunities for collaboration. I was attending another conference the following week and I was uncomfortable about the thought of this happening again. So, I decided to contact my People Leader and get her advice. She set up a time for me to discuss my concerns with a representative from the Law Department and together we discussed how I could proceed if this happened again. It turns out I was right to be concerned, and I was reminded that it is never appropriate to discuss this type of information, even in a really casual way. I learned that the best way to handle this type of situation is to politely but firmly excuse myself from the conversation and report the incident to my People Leader or Mosaic's Law Department immediately. As a result of this conversation, I feel much more prepared if this happens again.

## GATHERING COMPETITIVE INFORMATION

We respect and protect our competitors' intellectual property, trade secrets and confidential information. We do not acquire information about our competitors by illegal or unethical means.

While it is legitimate for us to monitor our marketplace and acquire certain information about our competitors, there are limits to how we can obtain and use competitive information.

- You must never ask someone to violate their confidentiality obligations.
- You must never hire someone from a competitor to obtain trade secrets or confidential information.
- If you accidentally come across documents belonging to a competitor that are, or you think may be, confidential, you should not read, copy or distribute the documents. You should immediately notify Mosaic's Law Department and follow the instructions you are given.



## KNOW THE CODE

- Earn business fairly and in compliance with all antitrust and competition laws.
- Avoid all tactics which involve misstatements or manipulation.
- Never enter into inappropriate agreements or discussions with competitors or customers.
- Respect and protect the confidential information of our competitors.



# We Promote Sustainability By:





## Acting as Stewards for our Environment

Mosaic's focus on sustainability forms the roots of our success. Preserving and promoting the natural environment is paramount for Mosaic- and essential to the sustainability of our business. We strive to conduct our business in an environmentally sensitive and responsible manner in every country in which we operate. Mosaic is committed to conserving energy, water and other natural resources, reducing waste and managing production with minimum impact on the environment.

### COMPLIANCE WITH APPLICABLE LAWS

We comply with all applicable environmental laws. We also ensure that our operations meet Company policies relating to environmental protection, which in some cases may be more stringent than applicable laws. If you believe a violation of the law or Company policy has occurred, or could occur, you must immediately notify your People Leader and Mosaic's Law Department. You must also immediately control and report any spills and releases as required by applicable laws and Company policy.

### COMPLIANCE WITH APPLICABLE PERMITS

Complying with applicable permits is essential to our business operations. You must know, understand and follow the requirements and limitations of permits applicable to the work you do and must immediately notify your People Leader and Mosaic's Law Department if you become aware that a potential permit deviation or issue exists.



## KNOW THE CODE

- Understand and comply with Mosaic's policies related to environmental matters.
- Understand and comply with the operating requirements applicable to your job.
- Report environmental concerns immediately.
- Always consider the environment in every business operation and decision

## Q & A

**Q:** We are planning to implement a small modification in the plant that I help to manage. This modification will help us to improve the overall efficiency of the plant, although not its total output. The plant is covered by a number of environmental permits, but I am comfortable that the modification will not have any environmental impact. May we proceed with the modification?

**A:** Even minor changes in our plants may have consequences which may conflict with our existing permits, or jeopardize our compliance with them. You should discuss your proposed plant changes with a member of the Environmental, Health Safety & Security team.



## ENVIRONMENTAL STEWARDSHIP

We strive to be responsible stewards of the environment by exceeding mandated standards when possible, by minimizing the impact of our operations on the environment and by proactively incorporating environmental initiatives into our daily operations. We encourage the adoption of the 4Rs of nutrient stewardship: right source, right rate, right time and right place. As part of this commitment, we:

- **Use natural resources responsibly**, by seeking to develop metrics to better understand and track our environmental footprint. This allows us to consider and pursue initiatives to conserve water, fuel and energy, and to use these resources more efficiently.
- **Reduce waste and emissions**, through recycling and other initiatives. This requires us to handle, transport and dispose of raw materials, products or wastes, safely and in an environmentally responsible manner.
- **Reclaim and enhance ecosystems affected by our operations** by seeking opportunities that are near mined lands and by meeting and exceeding local, state and federal standards where practicable.

## Working within Our Communities



At Mosaic we understand the importance of sustainable practices to our communities. We utilize local suppliers and fair employment practices in the communities where we operate, and we have developed stringent contractor safety programs.

We invest in the strength and vibrancy of our communities. We are proud of the long-term economic impact created in our communities – and the improved profitability for farmers and their families.

## PARTICIPATING IN POLITICS AND GOVERNMENT AFFAIRS

Mosaic believes that an active, inclusive and fair political process promotes open government and healthy, productive societies. We encourage our employees to participate in the political process responsibly and, as a company, we will engage constructively with all the governing authorities where we operate.

## CORPORATE POLITICAL ACTIVITY

Employees may not make any direct or indirect political contribution or expenditure on behalf of Mosaic or any of its affiliates unless permitted by applicable law and approved in advance by Mosaic's Law Department. This applies to contributions to any U.S. or non-U.S. political party, candidate, campaign or public official. Political contributions or expenditures include:

- Buying tickets for a political fund-raising event.
- Loaning personnel during working hours for fund-raising activities.
- Paying for advertisements and other campaign expenses.

## LOBBYING

Mosaic will not exert, or attempt to exert improper influence on any government agency, representative or legislator to produce an outcome that is favorable to the company.

Lobbying covers many legitimate activities but it requires disclosure and is subject to specific rules. You may be engaged in lobbying if your work involves:

- Contacts with legislators, regulators, executive branch officials or their staffs;
- Government contract sales; or
- Efforts to influence legislative or administrative action.

You must discuss these activities with Mosaic's Law Department to determine whether disclosure and other rules apply.

## PERSONAL POLITICAL ACTIVITY

While Mosaic supports employees' rights to engage in the political process, you must keep your personal political contributions and activities separate from Mosaic.

Any political contribution you choose to make should not refer in any way to your employment or use the company's assets, including Mosaic's name.

## REPORTS TO GOVERNMENT AGENCIES AND COOPERATION WITH GOVERNMENT INVESTIGATIONS

Mosaic makes reports to government agencies as required by law and cooperates fully with government investigations. If you are asked to provide information in connection with a government or regulatory agency inquiry or investigation, any information you provide must be truthful and accurate.

To ensure that you also protect Mosaic's legitimate interests, you should seek advice from Mosaic's Law Department before responding to a non-routine request for information from a government or regulatory agency.



## KNOW THE CODE

- Understand the rules and follow Mosaic's policies that apply to political participation by seeking approval when required.
- Cooperate fully in any government investigation.



## Protecting and Using our Assets

Mosaic's assets are valuable, acquired through the hard work of all of us, and essential to running our company profitably and successfully. We must show care and good judgment in using and protecting our Company assets responsibly, so that we avoid loss, damage, theft, unauthorized or improper use, and waste.

We must use our Company assets for business purposes in a thoughtful and responsible way, avoiding unauthorized use, neglect, or risk of loss or damage.

### PROPRIETARY AND CONFIDENTIAL INFORMATION

Mosaic's proprietary information is any information that Mosaic owns. It is the product of our peoples' hard work and innovation, as well as substantial investments in planning, research and development.

The value of our proprietary technology, ideas, creations, innovations and information – intellectual property – often exceeds that of more tangible items, like our physical property, because they are so important in helping us to:

- Develop new products;
- Improve our manufacturing capabilities;
- Attract new business opportunities; and
- Maintain a competitive advantage.

Much of our proprietary information is confidential and may be subject to protection by trade secret, copyright, patent or other intellectual property or legal rights. You must protect the Company's proprietary information.

This obligation remains applicable even if you no longer work for Mosaic.

Do not disclose Mosaic's proprietary or confidential information to persons inside or outside the Company unless:

- Doing so serves a legitimate business purpose;
- The recipients have a legitimate need to know;
- You are sure that you are authorized to release the information; and
- Individuals and organizations outside the Company to whom you need to provide confidential information have signed a confidentiality agreement approved by the Law Department prior to disclosure.

If you receive a subpoena or court order requiring the disclosure of any of Mosaic's non-public information, you must contact Mosaic's Law Department immediately for guidance on the correct response.

### PROTECTING MOSAIC'S INTELLECTUAL PROPERTY

In the course of our work we may learn about or create intellectual property that is, or may become, proprietary, as well as information that is confidential. Since this information gives us a competitive edge in the marketplace, the company's financial health or reputation may be damaged if our competitors or others obtain such information.

You are responsible for protecting Mosaic's intellectual property at all times.

## Q & A

**Q:** What are "Company assets?"

**A:** Company assets include all the property that Mosaic owns or uses to conduct business. Some examples are:

- Physical assets like land, facilities, vehicles, buildings, equipment, tools and inventory;
- Financial assets like cash, receivables, and investments;
- Proprietary information, including intellectual property such as trade secrets, patents, trademarks and copyrights, as well as confidential business information;
- Contract rights and licenses; and
- Information and communications systems and data, including electronic data or messages saved and exchanged when pertaining to company business.





## INFORMATION AND COMMUNICATIONS SYSTEMS

Mosaic's information and communication systems enable us to conduct our business. We must be prudent and responsible when using Mosaic's information and communications equipment and systems and always comply with Mosaic's [Acceptable Use Policy](#). We must protect all information and data from accidental or unauthorized disclosure, misuse, improper alteration or destruction. Reasonable personal use of Mosaic telephones, smartphones, computers, faxes and photocopiers is acceptable, but should not be excessive or interfere with timely performance of Mosaic's business.

Personal use of telephones, smartphones, computers, etc. is not acceptable if it:

- Incurs significant additional costs to the company.
- Interferes with employee productivity.
- Places Mosaic at risk of liability.

You may never use information and communication systems (including e-mail, instant messaging, the Internet or Intranet, or social media) for activities that are unlawful, unethical or otherwise contrary to this Code or company policy. Examples of such prohibited uses include:

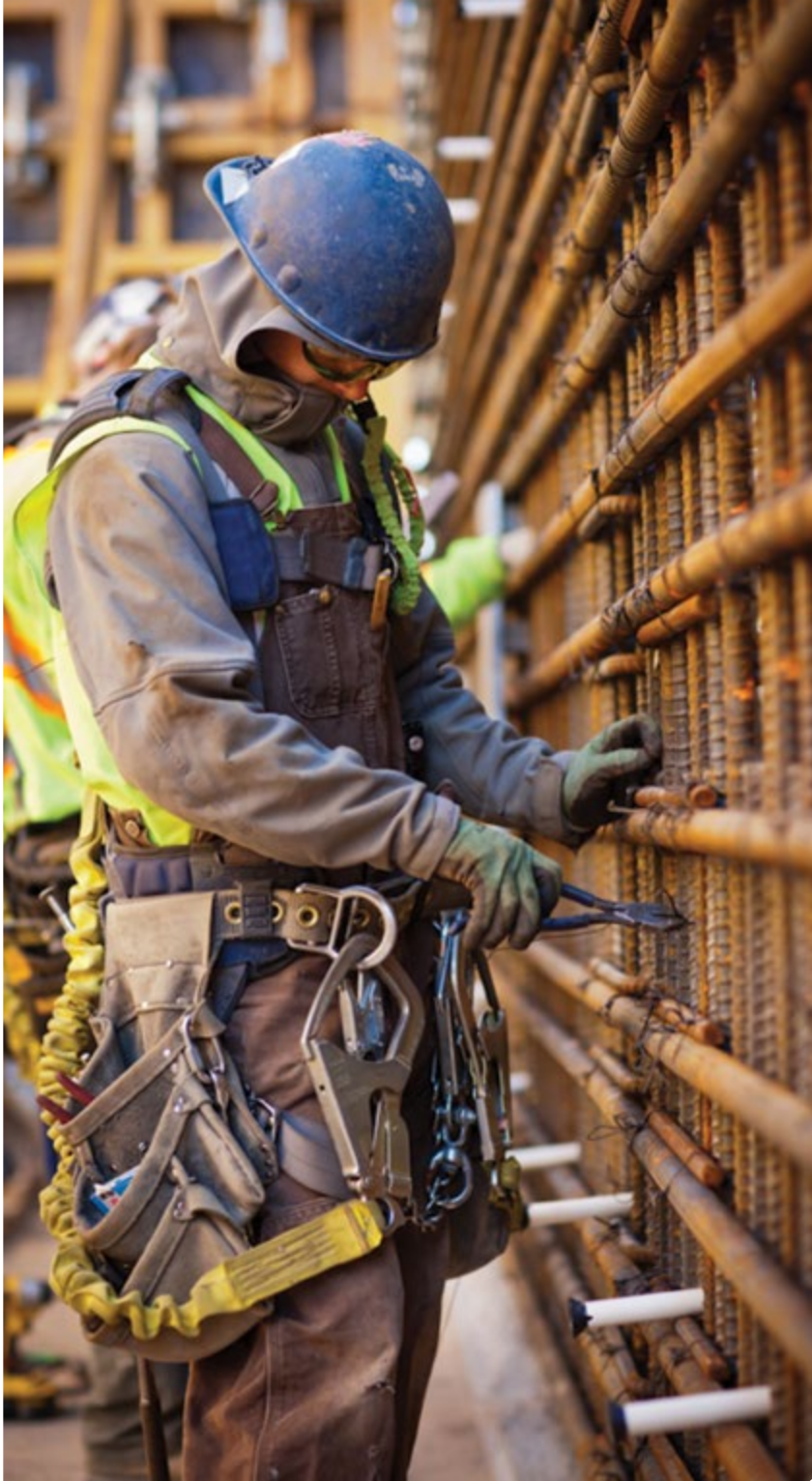
- Pornographic, obscene, offensive, harassing or discriminatory content.
- Chain letters, pyramid schemes or commercial ventures.
- Gambling, auctions or games.
- Large personal files containing graphic or audio material.
- Unauthorized mass distributions.
- Violation of others' intellectual property rights.
- Malicious software or instructions compromising Mosaic's security.

## Q & A

**Q:** What are some examples of proprietary and confidential information?

**A:** Some examples include:

- Business objectives and strategies
- Business processes and systems
- Unpublished financial information
- Trade secrets, "know how" and patent applications
- Exploration plans
- Mining and permitting plans
- Reserve information that has not been made public
- Research, formulas and technical data
- Customer, supplier and pricing information
- Salary and benefits data
- Employee information
- Computer programs and related documentation



## COMPANY FUNDS

We must handle company funds, including anything that has or represents financial value, responsibly, honestly, and in accordance with applicable Mosaic policies.

Personal or unauthorized use of Company funds is prohibited. You may use corporate credit cards only for authorized business purposes and never for any personal expenses.

## COMPANY BENEFITS

Mosaic's benefits plans and programs are provided as supplemental compensation. You must not misrepresent your health status, covered members, beneficiaries, or any other facts, including reasons for absence from work, in order to obtain benefits for which you, or someone else, are not entitled.

## SAFEGUARDING OUR FACILITIES

We all have a responsibility to be vigilant and proactive in maintaining the safety and security of Mosaic's facilities. Even if you do not have designated safety or security responsibilities, you should help keep Mosaic's facilities safe and secure by taking appropriate precautions, and being alert to:

- Unusual or suspicious activity on or around Mosaic premises;
- Violations of site entry/exit procedures;
- Unattended alarms;
- Individuals wearing inappropriate badges or suspicious identification;
- Spills;
- Hazardous (or potentially hazardous) substances or materials in open areas; Broken perimeter fencing;
- Unsecured tools, equipment or inventory; or
- Any other potential threat to site safety or security.

Immediately contact Mosaic's Environmental, Health, Safety and Security Department, or Mosaic's Law Department if you have a concern about the safety or security of a Mosaic facility. If the concern is sufficiently serious or time sensitive, contact local law enforcement or emergency services.





## KNOW THE CODE

- Safeguard Mosaic assets entrusted to you, or to which you have access, and use them efficiently.
- Take reasonable care to prevent unauthorized use, damage, destruction, waste, loss or theft of company assets.
- Protect company information, both non-public as well as publicly available information in which Mosaic or others have intellectual property rights.
- Use company assets only for Mosaic's business purposes, regardless of condition or value.
- Report any concerns about the use, abuse or endangerment of company assets to your People Leader, Mosaic's Law Department, or call the Ethics Line.
- Exercise caution when discussing Mosaic's business in public places where conversations can be overheard.
- Safeguard computer equipment, such as laptops, and be cautious in using such equipment where documents can be viewed by others (e.g. airplanes, public transportation, etc.).
- Do not use Mosaic's proprietary or confidential information for personal benefit or the benefit of persons outside of the company.

## Demonstrating Accuracy, Clarity and Transparency in our Record Keeping

Mosaic is committed to maintaining complete and accurate records in order to make responsible business decisions and to provide truthful information in compliance with applicable legal disclosure requirements. This includes disclosures made in financial reports and public documents filed with the U.S. Securities and Exchange Commission, or other regulatory authority, and other public communications.

Accuracy, clarity and transparency in our record keeping and reporting are essential to our credibility and reputation; they ensure we are accountable to our shareholders, potential investors and other stakeholders who depend on accurate, timely and understandable information about our financial transactions and results. We are all responsible for ensuring that the information we keep in Mosaic's business records is complete, accurate and timely.

## MAKING FULL AND FAIR DISCLOSURE

When disclosing material non-public information about Mosaic, its securities, financial condition, results or plans (whether in one-on-one discussions or group meetings), the information must provide the whole story – you must not “selectively” disclose information. Take particular care in this respect with any presentations or proposals you make to customers, business partners or others, and such presentations should be reviewed by Mosaic's Law Department prior to sharing their contents.

You must cooperate and be truthful with the internal and external auditors we employ to ensure accurate reporting, and with any investigator concerned with financial matters.

## CREATING ACCURATE RECORDS

We must create accurate records reflecting the true nature of the transactions and activities that we record. This standard applies to any and all records made in the course of operating our business or reporting on its performance, including:

- Environmental reports;
- Financial reports;
- Safety records;
- Performance reports;
- Quality data;
- Time records;
- Expense reports;
- Regulatory filings; and
- Other records of the Company.

## KNOW THE CODE

- Prepare company records accurately, completely and in a timely matter.
- Create clear and accurate records and retain them in accordance with Mosaic's policies.
- Never falsify records.
- Report concerns if you believe any transactions are recorded fraudulently.
- Never delete or alter a record relevant to an investigation unless the investigation is completed and you have consulted with Mosaic's Law Department.



Whenever you are unsure whether a record you are creating or dealing with is accurate or appropriate, you should check with your People Leader, the lead finance person for your Business Unit or function, or Mosaic's Law Department. It is also essential that you seek to resolve discrepancies in any records that you uncover.

If you know or suspect that a record is misleading or contains errors, you must promptly inform your People Leader and, when appropriate, customers and business partners. This includes reporting all errors you notice, no matter how minor they appear or how long ago they occurred.

Falsifying or improperly altering records is serious misconduct, and could lead to civil or criminal liability for the individual(s) concerned and for Mosaic. You should never direct anyone to prepare or approve a misleading record. Saying someone else directed you to create a record that you knew or had reason to suspect was false or misleading does not constitute a defense.

## RETAINING COMPANY RECORDS

We retain business records in accordance with Mosaic's [Records Retention Policy](#) and applicable laws. Business records include all documented information, regardless of physical form or storage media, providing objective evidence of transactions, events, activities, results or communications made.

We must manage our business records with particular care in situations where investigations or litigation are pending. Destruction of records to avoid disclosure in legal proceedings or an investigation may be a criminal offense. Always consult Mosaic's Law Department in the event of litigation or an external investigation, in order to follow specific corporate records policies.

## PROMOTING SUSTAINABILITY... BY REPORTING A CONCERN

Recently, I noticed our shipping manifest included a shipment that was scheduled to leave our facility last Tuesday, though I happened to know it didn't leave until Wednesday afternoon because of vehicle problems. When I asked the shipping manager, she told me she wasn't concerned because the trucking company had rerouted the truck to make sure the customer still received their product on time. Even if this is not a big deal, I know that we have to record all transactions accurately and that we are responsible for correcting errors, no matter how insignificant they may be. I decided I better report the issue to my People Leader, just to be safe. He was thankful that I brought this to his attention and made sure the exact shipment date was recorded.

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*Accuracy, clarity and transparency  
in our record keeping and reporting  
are essential to our credibility and  
reputation*

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## Complying with Securities Regulations

Mosaic does not permit you to use, or help others use, information you learn about the company or about a third party through your work for Mosaic to profit in the stock market.

As employees of Mosaic, we may be aware of material, non-public or “inside” information, which could reasonably lead a person to buy or sell Mosaic’s or another company’s securities. Those employees who are on the Company’s “Restricted List” must abide by additional restrictions as defined in Mosaic’s [Insider Trading policy](#).

Insider trading is not only unethical, it is a serious violation of the law and can result in severe civil or criminal penalties, including imprisonment. If you have any questions or concerns about insider trading and your responsibilities to avoid it, you should contact a member of Mosaic’s Law Department.

## Q & A

**Q:** What are some examples of material non-public information?

**A.** Some examples of material non-public information include:

- Information that Mosaic is about to acquire a company or sell a business unit.
- Information that we are about to announce a major change in strategy.
- Information that Mosaic is going to open or close a particular mine or production facility.
- Information that we are expanding or reducing operations at a particular mine or other facility.
- Information regarding Mosaic’s earnings or financial position.

## KNOW THE CODE

- Never trade or help others trade in Mosaic’s or another company’s securities using information that may be viewed as material, non-public information (even if you acquired it as a “tip” from others).
- Do not provide others with “tips” about Mosaic’s or another company’s stock, when you could not trade in the stock yourself because of the above requirements.
- Do not transmit or post any non-public information about Mosaic or any of its affiliates, customers or suppliers (including by means of an electronic chat room or message board) to any organization or individual not authorized to receive or possess it.
- Consult the [Insider Trading policy](#) or contact Mosaic’s Law Department if you have any questions about whether trading is appropriate.







We Support Connectivity By...





## Supporting Diversity and Promoting Fair Employment Practices

Mosaic aims to be the employer of choice for an engaged inclusive workforce. We are also dedicated to the continuous professional growth of our employees.

We recruit and retain a workforce that properly reflects the diversity of background, culture, beliefs, and characteristics of the communities in which we operate. We promote work environments and business relationships that recognize the value of diversity in enhancing our productivity, business success and employee loyalty.

We are committed to maintaining a positive and dynamic work environment where the principles of equal opportunity, equal treatment, and diversity enable personal fulfillment and shared success. We encourage teamwork, innovation and frankness.

### EQUAL OPPORTUNITY / EQUAL TREATMENT

We comply with all relevant employment laws and regulations in the various countries in which we do business. We prohibit all forms of discrimination and make reasonable accommodations for employees' disabilities and religious beliefs and practices.

If you observe or suspect any incidents of discrimination, you should report it immediately to your People Leader, Human Resources, Mosaic's Law Department, or through the Ethics Line.



## Q & A

**Q:** As a People Leader, do I have additional responsibilities when it comes to supporting diversity and promoting fair employment practices?

**A.** Yes. People Leaders are expected to promote and effectively manage diversity within the company to enhance overall productivity, business success, and employee engagement. You are also expected to help ensure our workplace remains free from discrimination. If you are a manager or People Leader, you must ensure that all aspects of the employment relationship – including recruitment, hiring, training, promotion, compensation, benefits, transfers, layoffs, and leaves of absence – are carried out without regard to race, color, gender, age, ethnic or national origin, religion, sexual orientation, gender identity, disability, or (in the U.S.) status as a disabled veteran or war veteran.

### KNOW THE CODE

- Support a workplace where diversity of people and ideas are valued, where frankness, innovation and teamwork are rewarded.
- Treat everyone fairly and never discriminate on the basis of race, color, sex, age, disability, marital status, sexual orientation, gender identity, religious beliefs, job title or on any other unfair basis.

# Q & A

**Q:** What are some examples of harassment?

**A.** Some examples include:

- Sexual advances or requests for sexual favors;
- Sexually suggestive verbal remarks;
- Unwanted physical contact or conduct of an intimate or sexual nature;
- Offensive, insulting, or inappropriate comments, slurs, remarks, jokes, or teasing;
- Showing offensive, insulting or inappropriate pictures or written material;
- Negative stereotyping;
- Gender-based conduct (or threats) that affects another employee's job, such as imposing discipline, rejecting someone for promotion, or affecting someone's pay or benefits; or
- Behavior that creates an intimidating, hostile or offensive working environment.

## Treating Each Other with Respect and Ensuring Freedom from Harassment

Each of us has a fundamental obligation to treat every person with respect and to foster a positive workplace culture. Mosaic is committed to creating and sustaining a workplace environment defined by mutual respect, collaboration and shared success. The quality of our relationships – especially the level of openness, honesty and professionalism we bring to them – directly impacts our ability to succeed, both individually and collectively, and to better serve our customers.

We all have the right to work in an environment that is free from harassment, regardless of the nature or basis for it, and to expect that any occurrence will be promptly investigated and resolved without fear of retaliation. We must never behave in a threatening or violent manner or act in a way that harasses, degrades or illegally discriminates against others. For more information please consult

[Mosaic's Harassment Policy](#).

Mosaic prohibits harassment, whether based on a person's race, color, ethnic or national origin, age, gender, real or suspected sexual orientation, gender identity, religion or perceived religious affiliation, disability, or other personal characteristic.

Any person found to have engaged in or condoned harassment will be subject to disciplinary action, up to and including termination, and possibly civil or criminal liability. This includes using Mosaic property, bulletin boards, computers, or documents as a way to engage in harassment.

## KNOW THE CODE

- Conduct yourself professionally, showing respect to others.
- Avoid all forms of harassment at all times.
- Respect other's confidentiality and privacy rights.

## PROMOTING CONNECTIVITY...

### BY FINDING A WAY TO WORK TOGETHER

Since I joined my new department, a co-worker has been repeatedly telling jokes that make me feel uncomfortable. I know that he does not mean any harm, but this does not encourage me to work collaboratively with him. I had been afraid to say anything, because I did not want people to think that I did not have a sense of humor. Last week I finally told him that his jokes were upsetting me, even though I knew that this was not his intention. Since then, he has totally respected my request and has kept the jokes out of our conversation. He has remained friendly and approachable and we are working well together now. I'm glad I had the courage to say something: it has really paid off.

If you observe or suspect any incident of harassment, report it immediately to your People Leader, Human Resources, Mosaic's Law Department, or through the Ethics Line.

## Respecting Personal Information

Protecting the personal information of one another and those with whom we interact on behalf of Mosaic is essential to ethical business conduct. Mosaic complies with all privacy and data protection laws that apply to the information we collect. We must use care whenever working with personal information, and access personal information for appropriate business purposes only.

## Preserving our Reputation in Internal and External Interactions and Communications

Mosaic's reputation is a vital asset because it is so closely connected to how trusted and respected we are by those who hold Mosaic's future in their hands – our employees, shareholders, customers, communities, business partners, suppliers, regulators, prospective employees and many other stakeholders around the world. We need to be perceived as a trustworthy organization that keeps its word, and as an ethical company.

To help ensure that we are always providing consistent, accurate and truthful information about Mosaic to the public and the media, Mosaic has designated certain individuals to speak on the company's behalf. If you are asked by the media or some other individual outside of the company to comment on a matter related to Mosaic, please contact the Public Affairs Department.

## PRACTICING RESPONSIBLE USE OF SOCIAL MEDIA

You must be especially careful when using social media, whether you are using it for personal reasons or for business purposes. When your use of social media is personal in nature, you must not disclose any confidential information that you learn as a result of your position at Mosaic, including information about our Company, or any of our customers, suppliers or distributors. You must also be sure to communicate respectfully and be mindful of the public nature of all social media. Always make it clear that the views you are expressing are your own personal views and not Mosaic's views. If you plan to use social media for business purposes, make sure you are authorized to do so. Refer to [Mosaic's Global Social Media Policy](#) and [Social Media Tips for Employees](#) if you need more information or have specific questions..



## KNOW THE CODE

- Review Mosaic's policies on Social Media
- Always communicate carefully, honestly and respectfully.
- Be mindful of the public nature of social media and be sure to use it, in a way that does not compromise company information or Mosaic's reputation
- Use good judgment and use 'I' instead of 'we'.



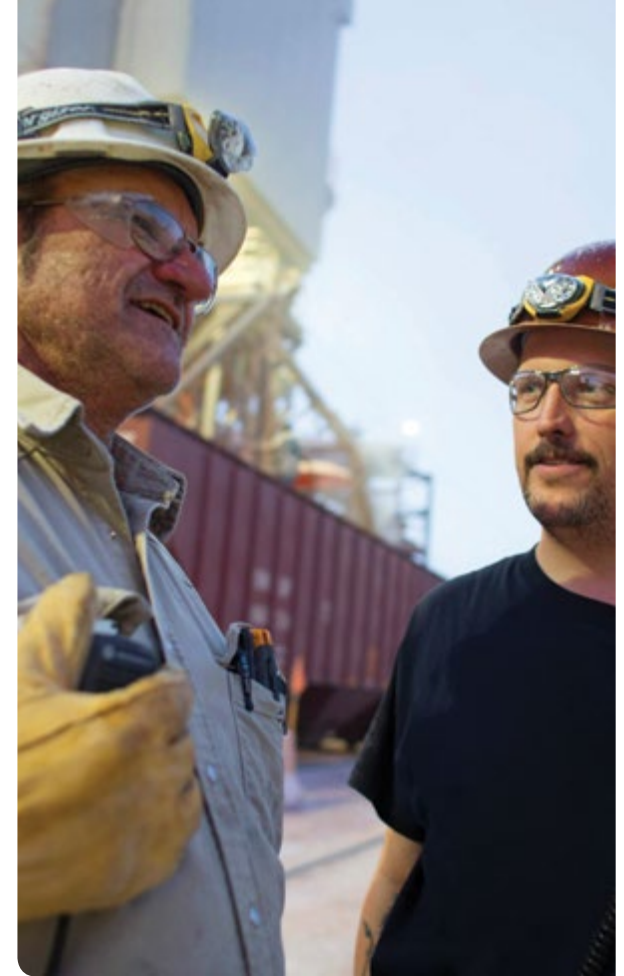
# Conclusion



By using this Code and Mosaic's core values – Integrity, Excellence, Sustainability and Connectivity – to guide our individual and collective decision-making and conduct, we will enhance Mosaic's reputation, function cohesively as a global organization, and achieve consistency in a time of rapid change.

## Asking for Help and Reporting Concerns

If you need advice, have a business conduct concern, or need to report misconduct, you should speak to your People Leader or local Human Resources representative. If for any reason you cannot, or do not want to raise the matter with your People Leader or local management, please contact the Vice President of your functional organization, Mosaic's Law Department, Chief Compliance Officer or the Company's Senior Vice President - Human Resources. Alternatively, you may submit your concern, anonymously if you wish, at: [www.mosaic.ethicspoint.com](http://www.mosaic.ethicspoint.com) or by calling Mosaic's confidential Ethics Line.



### MOSAIC'S ETHICS LINE

Report your concern by calling Mosaic's confidential Ethics Line.

**(877) 261-2609**

For calls within the U.S. and Canada.

**(503) 726-3224**

For collect calls from outside of the U.S. and Canada. Some international locations may have a local ethics phone number; please see the employee website or workplace poster for details.

### MOSAIC'S ETHICSPPOINT

Submit your concern, anonymously online.

[www.mosaic.ethicspoint.com](http://www.mosaic.ethicspoint.com)





The Mosaic Company  
3033 Campus Drive  
Suite E490  
Plymouth, Minnesota 55441  
800-918-8270

[www.mosaicco.com](http://www.mosaicco.com)