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	Policy owner:	Sustainability management
	Approved by:	Legal Presidency Corporate Affairs Latam Sustainability Committee
<b>Latam Sustainability Policy</b>	Effective date:	August, 1st, 2021

## 1. PURPOSE:

This **Sustainability Latam Policy**, hereinafter simply referred to as “Policy”, is intended to establish Nutrien's guidelines (as defined below) regarding commitments and principles to be applied in the management of its businesses, with a focus on the incorporation of environmental, social and economic aspects in its governance practices. This Policy complements and strengthens the strategy established by Nutrien's Sustainability Agenda and serves as reference for addressing socio-environmental, corporate governance and ethical issues in a structured and focused manner.

## 2. SCOPE:

The purposes of this Policy are: (i) establish assumptions and mechanisms of corporate governance for Environmental, Social and Governance issues and requirements (the “Sustainability Criteria”) to address therein; (ii) provide guidelines that encourage compliance with each of the aforementioned Sustainability Criteria at all levels of the organization, to ensure that sustainability issues are integrated into Nutrien's culture, including permeating its decision-making processes; (iii) provide alignment between the strategic focus of the business and Nutrien's perennial commitment to the Sustainability Criteria contained in this Policy; (iv) define commitments assumed by Nutrien based on such Criteria and the way in which the rendering of accounts will be carried out internally and externally (including before society), thus supporting the organization's vision of social responsibility; (v) ensure that the Principle of Integrity (Nutrien's fundamental value) is manifested in interactions with Stakeholders, in compliance with the legal and regulatory requirements applicable to the operation of its businesses; (vi) promote the adoption of good socio-environmental sustainability practices, contributing to Sustainable Development in the Value Chain.

## 3. COVERAGE


This Policy applies to all Employees of Nutrien Soluções Agrícolas Ltda. (“Nutrien”) and its Affiliates, with repercussions for Stakeholders (in particular, Clients and Suppliers). Nutrien Soluções Agrícolas Ltda. and its Affiliates are collectively referred to simply as “Nutrien”.

## 4. DEFINITIONS:

All terms and expressions used in this Policy with their initials in capital letters will have the meanings assigned to them in this Policy. According to the context, the terms defined in the singular must be observed for the plural and vice versa, as well as the variations of feminine and masculine gender.

“Affiliates” means any entities that Control, are Controlled by, or are under common Control with Nutrien.

“Sustainability Agenda” means the set of topics and actions prioritized by Nutrien in relation to the sustainability of its business, as well as those of its Stakeholders.

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“Low Carbon Agriculture” consists of the adoption of a program aimed at the integrated management of rural properties with aptitude for agricultural production, by encouraging environmental regularization and preservation established by the Forestry Legislation, ensuring food and nutritional security.

“Biodiversity”, or biological diversity, means the set of all existing living beings, which includes all plants, animals and microorganisms on Earth.

“Value Chain” means the “Complete sequence of activities or parts that provide or receive value in the form of products or services.” (Source: ABNT NBR ISO 26000 Guidelines on Social Responsibility).

“Control” means (i) the possession, directly or indirectly, of partner rights equivalent to more than 50% (fifty percent) of the votes in the resolutions of the general assembly or meeting of partners, and the power to elect the majority of managers of a given legal entity, or (ii) the ability to use its power to direct the social activities and guide the operation of a given legal entity, either through the ownership of shares or quotas with voting rights, by virtue of contract or agreement of shareholders or quota holders, or in any other way.

“Sustainable Development” means “*Development that meets the needs of the present without compromising the ability of future generations to meet their own needs*”. (Source: Our Common Future - Brundtland Report)


“Clients” refers to the Individual (Farmer) or Legal Entity established under any legally admitted form for the performance of agricultural activities, which intend to initiate or maintain a commercial relationship with Nutrien for the products’ acquisition, services and agronomic solutions by this marketed, distributed, provided or made available.

“Employees” means all natural persons who maintain an employment relationship with Nutrien, or with any of its Affiliates, formalized through an employment contract and/or who, on such date, is included in Nutrien's payroll, and/or any of its Affiliates.

“Stakeholder Engagement” means ways of identifying needs and demands, anticipate, mitigate, or eliminate risks, build and maintain a relationship with Stakeholders, based on trust and mutual strengthening of reputation, as a way of ensuring Sustainable Development.

“Community Engagement” means all initiatives, the benefits of which extend to or overflow the community around Nutrien. It involves, for example, the rational use of natural resources, waste control, encouraging local initiatives, etc.

“Sustainability Governance” means the management model adopted to ensure the strategic alignment and continuous evolution of sustainability topics at Nutrien.

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“Impact” means any positive or negative change resulting, in whole or in part, from Nutrien’s past and present decisions and activities on society, the economy or the environment.

“Private Social Investment” means “*the voluntary transfer of private resources in a planned, monitored and systematic way for social, environmental and cultural projects of public interest*”. (Source: GIFE – Group of Institutes, Foundations and Companies, acronym in Portuguese for *Grupo de Institutos Fundações e Empresas*).

“ESG” abbreviation in English for the terms Environmental (Environmental, E), Social (Social, S) and Governance (Governance, G) used by the capital market and its investors to indicate the evaluation of environmental, social and governance aspects of an organisation. The integrated analysis of these aspects helps with future financial performance assessment and the ability to generate value in a responsible manner in the long term.

“Socio-environmental Compliance Protocol” are the Sustainability Criteria composed of assumptions, actions and conditions defined by Nutrien in the relationship with Stakeholders, structured to achieve Sustainability Governance.

“Social Responsibility” means the “*Responsibility of an organization for the impacts of its decisions and activities on society and the environment, through ethical and transparent behaviour that contributes to sustainable development, including the health and well-being of society; takes into account the expectations of ‘Stakeholders’; complies with applicable law and is consistent with international standards of behaviour; is integrated throughout the organization and practiced in its relationships.*” (Source: ABNT NBR ISO 26000 Guidelines on Social Responsibility).

“Stakeholders” or “Interested Parties” means “*any organization or individual that may be affected by the activities of the firm [herein understood by Nutrien] and whose actions may affect the company’s ability to implement its strategies and achieve its objectives* (Source: AA 1000)”.


## 5. GUIDELINES:

Nutrien is committed to promoting important transformation through ambitious commitments that drive systemic change and lead the next wave of agricultural evolution. Therefore, in the context of Latin America, the principles of Nutrien’s strategy and, consequently, of this Policy are based on 3<sup>1</sup> pillars and 6<sup>2</sup> fundamental themes, detailed below.

### 5.1. CLIENTS

<sup>1</sup> Pillars: 1. Clients; 2. Social Commitment; and 3. Governance.

<sup>2</sup> Key Themes: 1. Low Carbon Agriculture; 2. Biodiversity; 3. Community; 4. Diversity; 5. Processes and Transparency; and 6. Environmental Footprint Reduction.

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This Pillar aims to contribute to making our Clients' activities more sustainable based on the adoption of sustainability criteria in their businesses. In this sense, Nutrien is committed to encouraging the incorporation of sustainable practices by Clients into their processes and offering recognition, according to the requirements established in its own actions, so they become more aware of their socio-environmental responsibilities and broaden their understanding on the importance of the theme for Brazilian agriculture. To comply with this Pillar, the Socio-environmental Compliance Protocol detailed below was established.

### 5.1.1 Low Carbon Agriculture

As one of the fundamental themes, it aims to provide solutions, digital tools and innovative products for sustainable agricultural production that brings even more profitability to the Client, even creating the basis for the participation of farmers in the carbon market.

### 5.1.2 Biodiversity

Nutrien's products, services and agronomic solutions aim to improve the crop's productivity and profitability, thus contributing to reducing the need to convert non-agricultural areas into planted areas, in addition to improving the soil quality and health, as well as increasing biodiversity in these lands.

## 5.2 SOCIAL

As part of Nutrien's purpose-driven culture, we develop respectful and positive relationships with our Employees, contractors, suppliers, clients, and local communities. With that, we aim to make a positive contribution to our Value Chain and society as a whole.

### 5.2.1 Community


We aim to contribute to the transformation of communities surrounding our activities in a more sustainable way, boosting the quality of education in the cities where we operate through the promotion of social projects made possible by Private Social Investment.

### 5.2.2 Diversity

Promoting equity, diversity and inclusion (EDI) growth in our Value Chain increases Nutrien's organizational strength, reflects the diversity of our Stakeholders and creates fairer communities, regardless of religion, gender, race, age and physical and psychological conditions. We are committed to providing all Employees with a respectful, diverse, and inclusive workplace and expect Stakeholders to be aligned with Nutrien's ideals.

### 5.2.3 Socio-environmental Compliance Protocol

Nutrien strives to conduct its business in the right manner and is committed to complying with all laws and regulations


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wherever it operates, only doing business with Integrity.

Our Clients are considered an important asset to Nutrien, along with its employees, shareholders, suppliers and the communities in which it operates. We believe that our reputation is also built from our relationships with Stakeholders and, therefore, we engage in business practices that are not only honest, but above all responsible, that benefit both Nutrien, our Clients and the community in which we operate. Therefore, Nutrien only initiates and maintains commercial relationships with Clients aligned with its values, striving to help those who share the same purpose. If there are no means of guaranteeing Integrity, there is no choice but to refuse to do business with those who violate mandatory compliance requirements contained in this Policy.

The Socio-environmental Compliance Protocol was created as an opportunity for Nutrien and the Stakeholders to contribute to Sustainable Development, adding practices that comply with the Law, while also encouraging producers to become compliant with legislation requirements. As a result of these assumptions, the following conditions were established in Nutrien's Socio-environmental Compliance Protocol, which requirements are periodically monitored against our Clients:

- 5.2.3.1 Nutrien reserves the right not to initiate or maintain commercial relationships with Clients, while non-compliances with one or all of the following environmental requirements persists:
- a) Clients who are listed on the Governments' public list on slave labour, as published by the competent authorities. In this condition, any purchase order will be refused and will only be analysed again for acceptance purposes, after the Client is cleared from the Governments' public list on slave labour.
  - b) Clients who have been fined for illegal deforestation on their property, with sanctions for illegal deforestation determined by the competent authorities, will be offered assistance to become compliant, as follow
  - c) Clients who present other socio-environmental non compliances in their properties and/or linked to their names (CPF and/or CNPJ), will be assessed by the Nutrien's LATAM Sustainability Committee for approval or denial of purchase orders.
- 5.2.3.2 Once the existence of an assessment with sanctions for illegal deforestation is verified by the competent bodies (SEMA, ICMBIO, IBAMA or similar), Nutrien will offer an incentive for compliance with the aim of regularizing, under the terms defined by Nutrien. It is up to the Client whether or not to accept support. On an optional basis, the incentive offered by Nutrien, provided that if the Client chooses to:
- (i) accept the regularization incentive, the agreed terms and conditions will be formalized and, if fully and properly fulfilled, will allow the Client to do business with Nutrien again;

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- (ii) not accept the incentive offered by Nutrien or does not promote the regularization of its situation, any purchase orders generated as from the irregularity finding will be refused while the environmental non-compliance of the Client persists. It is hereby understood that compliance will be demonstrated by the Client by means of the Regularization Plan filing with the responsible authority.

### 5.3. GOVERNANCE

Governance, aligned with the purpose and focused on reducing exposure to risk (including reputational risk), increases our competitiveness, as well as ensuring that the sustainability culture permeates the entire organization so that we are, legitimately, vocal about each of the criteria that make up this Policy with our value chain and society.

#### 5.3.1 Processes and Transparency

Through processes, policies, and practices, we will seek to ensure that the criteria that make up this Policy is fully incorporated into the company's day-to-day activities, in addition to seeking opportunities to become vocal on the subject throughout our value chain. In this way, Environmental, Social and Governance criteria becomes a strategic issue for our Employees, Clients and Suppliers. We are helping them in the development of the knowledge necessary to support our efforts, as well as organizing and offering learning opportunities on topics that are relevant to the strategy embodied in this Policy.


#### 5.3.2 Reduction of Environmental Footprint

We are committed to an overall reduction of our environmental footprint in relation to carbon emissions level in the atmosphere and will create and implement management systems to improve eco-efficiency in our plants and operations and with our different Stakeholders.

### 5.4 GOVERNANCE OF THE SUSTAINABILITY THEME AT NUTRIEN

The management process of this Policy aims to leverage the value of its criteria at all levels of the organization, including the themes prioritized in the sustainability agenda together with the business and functional areas, ensuring the assumptions and guidelines in this Policy are considered in the company's decision-making processes, strengthening the topic inside and outside the organization.

Therefore, a participative management system was created, based on the performance of multidisciplinary groups with responsibilities and authorities defined in this Policy, having as a premise the engagement of the organization's Stakeholders as well as Nutrien's Employees at all levels of the organization. The model advocates the collaborative construction of initiatives related to the themes prioritized in the Sustainability Agenda and their validation by the Sustainability Committee (or ESG Committee).

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The Sustainability Committee will have as key role ensuring that sustainability issues are incorporated as an attribute within the Nutrien culture, in addition to approving the initiatives and budgets allocated to them. This Committee will meet quarterly to monitor the initiatives developed by multidisciplinary groups and monitored by the Sustainability area.

## 5.5 COMMUNICATION

As part of its sustainability strategy, it is essential for Nutrien to maintain communication channels with Stakeholders on sustainability aspects, as well as to document and disclose, internally and externally, the scopes and results achieved when meeting social and environmental commitments voluntarily and publicly assumed by the company.

## 5.6 COMMITMENTS AND ACCOUNTABILITY

Reinforcing its responsible action, Nutrien will support voluntary commitments in social, environmental and governance topics that are convergent with its values and purpose to encourage the development of this Policy and of sustainable practices inside and outside the organization.

Nutrien is committed to transparency in its activities and, therefore, we will periodically report on our progress and achievements regarding the implementation of projects and initiatives that encompass the pillars presented in this Policy.

## 6 RESPONSIBILITIES:

The Board of Corporate Affairs and the Sustainability Management are responsible for proposing and updating this Policy, subject to approval by the Sustainability Committee, seeking alignment with the best practices in the market.


### Sustainability Committee

The Sustainability Committee (or ESG Committee) is responsible for advising, encouraging, and creating mechanisms to embed this Policy in the culture and management processes of Nutrien. This Committee is also responsible for validating the content of this Policy and Nutrien's sustainability guidelines in line with the organization's values.

### Executive Board

It is responsible for ensuring the application of this Policy and compliance with its principles in all its decisions, supporting the implementation of related initiatives, as well as encouraging the leader's formation with sustainability principles and values.

### Sustainability Management

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This Management is responsible for defining and following up the implementation strategy of this Policy, monitoring the progress of the topic management system, in addition to clarifying any doubts related to this Policy, establishing the necessary procedures for its implementation, as well as communicating and training the target audience about the guidelines instituted in this Policy.

### **Sustainability focus groups**

Their mission is discussing and promoting the development of the sustainability agenda within the organization, acting on specific themes that were prioritized by Nutrien. Its composition will involve managers, coordinators and other Employees from the areas indicated to compose the focus groups.

### **Leaders**

It is their responsibility to guarantee conditions for the team's engagement with sustainability issues and for compliance with the guidelines in this Policy.

### **Employees**

It is the responsibility of all Nutrien's employees and other audiences to comply with the guidelines set forth in this document.

## **7 EXCEPTIONS / ADDITIONAL INFORMATION:**

All requests or situations not covered in this Policy should be submitted to the Sustainability Management for proper evaluation.

All individuals covered by this Policy are responsible for maintaining behaviour consistent with this Policy. Accordingly, any violations of this Policy will be duly investigated, and may result in the application of appropriate sanctioning measures, including firing, when permitted by applicable law.


Suspected violations of this Policy may be reported through the Integrity Line ([nutrien-integrityhelpline.com](http://nutrien-integrityhelpline.com)) and/or through other channels and guidelines contained in the Nutrien's Code of Conduct.

This Policy will become effective on the date of its publication.

## **8 RELATED DOCUMENTS:**

Environmental Policy / SHE  
Sponsorship & Social Investment Policy



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Diversity Policy  
Code of Conduct.  
Anti-Corruption Policy.