

code of Conduct and Ethics in Business

Continuing our tradition of integrity



OUR VALUES



INTEGRITY

- Act fairly and honestly
- Never compromise ethics and values
- Promote a “Zero Accidents” and consider that they can all be prevented



EMPOWERMENT

- Take the initiative whenever necessary
- Don't fear mistakes, we can learn with them
- Find ways to say “yes”, no excuses to say “no”



EXCELLENCE

- To be market leaders
- Always focus on continuous improvement
- Be responsible for our commitments



TEAM WORK

- Respect others and their different points of view
- Listen and give honest feedback
- Realize that every member of our team is important to our success



AGILITY

- Act quickly
- Be decisive, precise and efficient
- Try to do the right thing from the start first time
- Focus on results



Our Mission

Produce and deliver all types of **Salt** that contribute to the improvement of everyday life.

Our vision

To be the best **Salt** producer in the world and offer excellent results for our investors.

Welcome to the Code of Conduct!

In a highly interconnected world that is experiencing change every day, it is important to understand what it means to be an ethical and responsible supplier. Our quality and excellence is closely linked to our reputation and maintaining a good reputation depends on each of us being responsible for our own conduct. Regardless of where our employees are located, we must ensure that our actions demonstrate a commitment to our values and promote a culture that reflects those values.

This Code of Business Conduct and Ethics ("Code") will provide useful information about our responsibilities so that we can consistently apply our values in any business situation. No code of conduct can answer every question or address every situation, which is why we have implemented resources for when some help or guidance is needed. If you are unsure what to do in a particular circumstance or if you are concerned that this Code or our policies are not being followed, please let us know about the situation. Speak to your supervisor or contact us through any channel described in this Code. Compliance is everyone's responsibility.

We believe that the integrity of our people and our commitment to Our Values will not only allow us to succeed today, but even more importantly, it will also help us achieve long-term success. Let's work together and follow our Code so we can live out our proud legacy.

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This Code applies to SCIH Salt Holdings Inc. and its qualified subsidiaries and affiliates, including, without limitation, Central Salt, LLC, Compañía Minera Punta de Lobos Ltda., Empresa Marítima SA, Kissner Milling Company Limited, Kissner USA Holdings, Inc. , Lyons Salt Company, Magco Inc., Morton Bahamas Limited, Morton Salt, Inc., NSC Minerals Ltd., Salina Diamante Branco Ltda., Sociedad Punta de Lobos Perú SAC, Sociedad Punta de Lobos SA, The Detroit Salt Company LC and Windsor Salt Ltd./Sel Windsor Ltée. (together, the “Company”).



A common ethical standard

It is important that we all work together to ensure a common high ethical standard for how we conduct business across our Company. This *Code of Business Conduct and Ethics* ("Code") and other Company policies will help you make good decisions in your daily work. As you will see, the Code includes sections on our responsibilities, teamwork, our commitment to safety and integrity, the need to be open and transparent, supporting the communities where we live and work, and understanding and following applicable laws.

No code of conduct can cover every possible situation, which is why we will continue to trust each other to use common sense and to speak up whenever we have questions or concerns.

My responsibilities Each of us, wherever we are, has a role to play in protecting the Company's image and integrity.

It is up to each of us:

- Work as a team and treat others with respect.
- Always behave professionally, honestly and ethically when acting on behalf of the Company.
- Demonstrate and defend Our Values.
- Be familiar with the information contained in this Code, Company policies and applicable laws. Pay special attention to policies applicable to your own professional responsibilities.
- Immediately report possible violations of this Code, Company policies and applicable laws to your supervisor or through the resources listed in this Code.
- Cooperate and tell the truth when responding to an investigation or audit.

Additional leadership responsibilities

If you are a director, supervisor or manager, it is your duty to fulfill the following additional responsibilities:

- Model ethical leadership and support your team members when they ask questions and express ethical concerns:
 - Create an environment where people feel comfortable speaking up.
 - Listen and respond to concerns when they are expressed.
 - Make sure no one who speaks out is retaliated against.
- Help your team members understand the requirements of this Code, Company policies, and applicable laws.
- Be consistent in applying our standards and holding people accountable for behavior at work. per your
- Make a sincere effort to keep up with regulatory changes that affect your areas of responsibility.
- Never ask or pressure someone to do something that you yourself would be prohibited from doing.



Making the Right Choice — Ethical Decision Making

You are often faced with a choice between right and wrong. In such cases, you should always choose the right one. There will be times when you are choosing between several options, and many of them may seem like the “right” one. These situations are called ethical dilemmas.

If you face an ethical dilemma and are unsure what to do, ask these questions about your options before taking action:

- Is the action aligned with all of Our Values?
- Are you in compliance with all Company policies?
- Is it consistent with our Company’s long-term goals and interests?
- Would I feel proud of the action if it were publicly disclosed?

If your answer to any of these questions is “NO” or “I DON’T KNOW,” don’t do it. Instead, contact your supervisor or use any of the other resources listed in this Code for guidance before taking action.

Closing the cycle

Our Ethics and Compliance Program must continually evolve to keep up with new and emerging risks and regulations. To help us stay on track, once you've made a decision, ask yourself the following additional question:

Do you think there are enough standards, policies, and resources in place to address the issue you faced, or do you think other steps should be taken? If you believe further action should be taken, contact your supervisor or the Legal or Human Resources Department.

Your suggestions will help us continually improve our Ethics and Compliance Program.

Where to look for help

You can ask questions and report potential legal, compliance, or ethical violations using any of the following methods:

- In most cases, it will be best for you to speak to your supervisor or manager first. They will be more familiar with the laws, regulations and policies that apply to their work.
- If you don't feel comfortable talking to your supervisor, talk to your supervisor's manager or contact Legal or Human Resources.
- If you report a problem to management or a representative of the Legal or Human Resources department, you may request that your communication be kept confidential. By doing so, you will be requesting that your identity not be revealed. However, in some cases, it may be necessary for your identity to be revealed in order for an investigation or legal action to proceed.
- If none of the steps above resolve your questions or concerns, or if you prefer, you can contact the Compliance Hotline at any time.

All reports are confidential and you may remain anonymous when permitted by local law.

Using the Line

Direct from Conformity



Compliance is everyone's responsibility. Each of us has an obligation to report situations or activities that are, or even appear to be, violations of this Code, Company policies, or the law.

When you show up to make a question or report conduct suspect, is protecting his colleagues and the Company reputation. Remember that a problem cannot be solved, the unless someone is informed

The Compliance Hotline is multilingual, free and available seven days a week, 24 hours a day and can be accessed by telephone or internet.

Telephone report:

Bahamas, Canada, USA

1-866-215-5366

Brazil

1. From an outside line, dial the direct access number for your location:

Brazil

0-800-888-8288; or

0-800-890-0288

2. After the English tone:

866-215-5366

Chile

1. From an outside line, dial the direct access number for your location:

Chile

800-225-288; or

800-800-288; or

800-800-311 (*from Easter Island*); or

800-800-312 (*from Easter Island*)

2. After the signal in English:

866-215-5366

Peru

1. From an outside line, dial the direct access number for your location: Peru

0-800-50-000; or

0-800-50-288

2. After the signal in English:

866-215-5366

Calls are answered by a service external and its information caller ID are not registered. You don't need to reveal your identity, but must provide information specific enough to allow a thorough investigation of the problem that be reporting.

The Hotline operator forwards your report to the Legal department for analysis, investigation and response. To the call the Hotline, you will receive a tracking number and can return to update your report or to respond to a question asked by the investigator.

Online report:

Reports to the Hotline can be made online at:

<https://sdb.ethicspoint.com>

(Brazil)

<https://splchileperu.ethicspoint.com>

(Chile and Peru)

<https://mortonsalt.ethicspoint.com>

(Bahamas and USA)

<https://windsorsalt.ethicspoint.com>

(Canada)

This method works in the same way as report by telephone to the Hotline number Direct. Complaints may remain under secrecy, if you wish, and you will receive a tracking number for updates.

Our non-retaliation policy

Regardless of the type of misconduct reported or the method of reporting, we will not tolerate retaliation against anyone who reports in good faith an alleged violation of this Code, Company policies, or the law.

We take allegations of retaliation seriously. They will be investigated and, if proven, those responsible for retaliation will be punished, including dismissal. If you believe you have been retaliated against, you should contact Legal or Human Resources or any of the resources listed in this Code.



Protecting our workplaces

Taking care of safety and mutual protection

Nothing is more important to us than health and safety. We must be alert, be disciplined and always look out for each other.

ALWAYS KEEP THIS IN MIND:

- Only do the work you are qualified to do.
- Make sure your performance is not impaired by alcohol or any medication, including prescription or over-the-counter medications.
- Speak up if you observe any unsafe working conditions and listen to others who speak out.
- Help contractors and others we work with understand and follow our safety and security procedures.
- Report any accident, injury or illness. Never assume that someone else has already informed you.
- Know the emergency and safety procedures that apply where you work.
- Threats, intimidation and violence undermine everything we stand for as an ethical company and will not be tolerated.
- Bringing weapons onto corporate premises and offices is prohibited.

Teamwork through inclusion, diversity and respect

We work best when we work as a team, treat each other with dignity and respect, and value other people's unique contributions.

We are committed to equal employment opportunity and prohibit discrimination and harassment based on race, national origin, sex, religion, color, disability, marital status, protected veteran status, sexual orientation, gender identity, gender expression, genetic information, citizenship or any other characteristic protected by law.

ALWAYS KEEP THIS IN MIND:

- Treat others with respect. Treat your coworkers as you would like others to treat their parents, spouses, or children at work because they are someone's parents, spouses, or children.
- Help create an inclusive environment where everyone can collaborate, develop and fully utilize their talents.
- Keep an open mind to new ideas and listen to different points of view.
- Please understand that offensive messages, derogatory comments, and inappropriate jokes are inconsistent with our culture and beliefs and are never acceptable.
- Inform others with whom we work of our expectation that they will act in a manner consistent with our sense of fair treatment and equal opportunity.

There is no harassment or intimidation in our workplace

We do not tolerate any form of bullying, abuse or harassment. This includes unwelcome, offensive, intimidating or discriminatory actions, as well as any form of sexual harassment.

Harassment means any inappropriate conduct, comment, display, action, or gesture by one person toward another based on race, gender, gender identity, sexual orientation, physical appearance, or various other protected aspects.

Harassment can take many forms, including but not limited to:

- Gender-based insults or sexist comments.
- Derogatory jokes, comments or harassment.
- Insults, provocations or slander.
- Displaying or circulating derogatory materials, such as photos or literature, which an individual may consider degrading.

Harassment also includes sexual harassment, which encompasses offensive or humiliating behavior related to a person's gender, as well as any conduct, comment, gesture or contact of a sexual nature that may cause offense or humiliation to any person or which may, for logical reasons, be interpreted by the person as a situation that establishes a sexual condition for employment or an opportunity for training or promotion.

These are behaviors that can be considered sexual harassment, among others:

- Unwelcome physical contact, such as touching, hugging, restricting movement, caressing or rubbing against someone's body.
- Sexually explicit statements, questions, discussions or jokes, whether oral or written.
- Sexual questions, comments, discussions, or jokes about a person's clothing, body, or sexual activity.
- Display or use electronic communications to display sexually explicit material, such as photographs, drawings or objects.
- Reprisals or implied or expressed threat of reprisal, for refusing to comply with a sexual request.
- Indecent exposure or sexual assault.

Harassing behavior is not limited to professional relationships during regular business hours on corporate premises. Workplace harassment can include instances where employees are off corporate premises during work-related travel, work-related social events, and work-related tasks or conferences.

ALWAYS KEEP THIS IN MIND:

- Don't just stand by and watch or encourage harassment. Immediately report incidents of harassment or bullying using any of the resources listed in this Code.
- Please be aware that inappropriate sexual comments or any other sexually offensive behavior will not be tolerated.
- Please remember that we expect you to follow this Code, Company policies, and the law whenever you work for or represent the Company in any capacity.



Keeping confidential information safe and secure

One of our most valuable assets is information. Unauthorized disclosure of confidential information could cause us to lose an important competitive advantage, embarrass the Company and harm our relationships with customers and business partners.

For these reasons, confidential information must be treated with care. This means that they must be accessed, stored and transmitted in accordance with our policies and procedures.

Protecting the privacy and confidential information of third parties

In recent years, individuals, companies and governments have shown increasing concern about the privacy and security of personal information.

Consequently, laws that protect the privacy of personal information and how it may be collected, disclosed, used and retained are becoming more common.

We respect the privacy and confidentiality of personal information. Only use personal information necessary to operate effectively or to comply with the law.

ALWAYS KEEP THIS IN MIND:

- Keep personal information safe and secure. This includes locking file cabinets, securing sensitive electronic documents, and locking your computer screen when you step away from your workstation.
- Use caution when providing personal data to anyone inside or outside the Company and limit access to authorized individuals. Use password protection and secure transmission methods.
- When we use third parties to provide services, we ensure that they understand the importance we place on privacy and that they must maintain our standards.

ALWAYS KEEP THIS IN MIND:

- Use and disclose confidential information only for legitimate business purposes.
- Appropriately identify confidential information to indicate how it should be handled, distributed and destroyed.
- Protect confidential and proprietary information of business partners.
- Never mention confidential information when others can hear what is being said (for example, on airplanes, in elevators, and when using cell phones in non-private spaces), and be careful not to send confidential information to unattended fax machines or printers.

Additionally, verify the accuracy of email addresses and use encryption when communicating sensitive information via email.

Confidential Information

Confidential information includes all non-public information or trade secrets that could be useful to competitors or harmful to the Company or its business partners if disclosed. This covers:

- Employee information (names, addresses, home telephone numbers, salary or wages, medical data and employee documents)
- Future/pending sales, acquisitions and mergers
- Pricing and marketing information
- Our strategic business plans
- Data developed or purchased by us or entrusted to us by our business partners.

Using our assets wisely

We all have a responsibility to use our assets and resources wisely and with care, and to protect them from misuse, damage, loss, theft and waste.

Company assets may include, but are not limited to, facilities, property and equipment, tools, vehicles, supplies, computers and digital systems, time, confidential and proprietary information, intellectual property, corporate opportunities, logos, trademarks and funds.

ALWAYS KEEP THIS IN MIND:

- Ensure our assets are not lost, damaged or misused.
- Protect our intellectual property and respect the intellectual property rights of others.
- Email and voicemail systems and their contents are considered Company property and, depending on their contents, may also constitute Company Records and must be maintained as required by applicable policies.
- You are required to use our assets for business purposes only, but limited personal use of telephones and computer systems is permitted as long as it does not impair performance or productivity or violate any Company policy.



Crisis management

Every day we face situations and problems that could become a crisis.

We want to be prepared, alert and safe. The Company has created clear and accessible crisis management protocols to ensure that we manage any crisis in a well-coordinated manner.

ALWAYS KEEP THIS IN MIND:

- Nothing is more important to us than health and safety. Make sure you are physically safe before doing anything else.
- Regularly review crisis plans so you're ready to act when the time comes.
- Share facts in your communications. Say what you see, touch, hear or smell.
- Avoid drawing conclusions until all the facts are known and evaluated.
- If you are not aware of the protocols to follow in the event of a crisis, contact the Legal department immediately.



Cooperation with investigations

All employees have a responsibility to cooperate fully with all investigations and audits. This includes internal investigations and audits, as well as those initiated by government authorities. Further damage can occur to the Company's image, as well as your image, if you mislead investigators or do not disclose what has been done rather than presenting the facts completely and honestly.

Contact your supervisor or Legal immediately for additional guidance if you are contacted by a government official who is conducting any type of investigation.

Responsibility and discipline

Violations of this Code, our policies, laws and regulations can result in serious consequences for you individually and for the Company. Violations may result in disciplinary action, including dismissal.

Others involved in the illicit act may also be subject to disciplinary action. This includes people who take little care to detect a violation, people who refuse to disclose information that could be important to an investigation, and supervisors who approve, "turn a blind eye," or attempt to retaliate.

Violations of regulations or laws may result in legal proceedings and penalties, including, in some circumstances, criminal prosecution.

Winning the right way

Preservation of product quality

We are committed to producing high quality products across all of our brands. We care deeply about product quality and ensure that our products exceed or meet our own internal standards, as well as standards set by laws and regulations and our industry. We are also committed to developing new products ethically and responsibly and to following guidelines and ethical standards applicable to research. If you are involved in any aspect of the development, packaging, handling or storage of our products, it is your duty to:

- Know the product quality standards, policies and procedures applicable to products produced in your unit.
- Comply with all applicable regulations and laws.
- Follow good manufacturing practices and testing protocols.
- Be alert to situations that could compromise our products.

If you see something that could harm the quality of our products, immediately report the matter to the Quality, Legal or Human Resources department.



Avoiding conflicts of interest

A conflict of interest occurs when your actions or personal interests make it difficult for you to carry out the Company's work or make objective and effective judgment in favor of the Company's interests.

ALWAYS KEEP THIS IN MIND:

It is impossible to describe all potential conflicts, but the following cases are some examples:

- Having an external job or a relationship with a competitor, customer, supplier or service provider.
- Being in a position to supervise, hire, or direct business to a relative.
- Take advantage of business opportunities that you discover through the use of Company assets, information or your position.
- Have significant investments in a competitor or business partner.

It is the duty of each of us to be proactive and, whenever possible, avoid situations that may have the appearance of conflict. If you find yourself in a potential conflict of interest, speak to your supervisor or the Legal or Human Resources department.

Depending on the circumstances, some conflicts may be resolved if handled appropriately.

Gift exchanges and entertainment

We do not offer or accept gifts, entertainment or other benefits that are intended to influence a decision or return business, services or confidential information.

ALWAYS KEEP THIS IN MIND:

As a rule, gifts, entertainment or other benefits of modest value may be offered or accepted.

Modest value:

- USD \$50 (Brazil, Chile and Peru)
- USD \$200 (USA and Bahamas)
- CAD \$250 (Canada)

However, in all cases, the following conditions must be met:

- Gifts, entertainment or other benefits should only be offered or accepted if:
 - The benefit cannot be interpreted as payment or consideration for influencing or rewarding a decision or action.
 - Do not violate the law.
 - When disclosed publicly, they would not embarrass you or the Company.
- The following practices are never permitted:
 - Offering or accepting gifts of cash or cash equivalents (gift cards, gift certificates).
 - Offering or accepting gifts, entertainment or other benefits that could harm the Company's image or reputation.
 - Gift, entertainment, or other benefit that violates the policies of the recipient's organization.

Gifts, entertainment or other benefits that are valued above the nominal value established by your company are permitted in exceptional cases and should only be offered or accepted after you have received

direct approval from your supervisor. If a supervisor has doubts about approval, they should send an email to compliance@sdb.com.br or review the request with any member of the Legal department. Please allow two business days for return.

Extra care should be taken when dealing with public officials

“Public employee” includes: employee of a company, school, hospital or other state or federal entity; political party or party official; public international organization or department or agency of the organization; and, in Canada, First Nations chiefs and councilors.

No gifts, entertainment or other benefits may be offered to public officials without approval from the Legal department. A gift includes modest items like lunch or company-branded objects. To receive approval, send an email to compliance@sdb.com.br

Requests made to an employee by a government official regarding an improper payment must be reported immediately to the Legal department or the Compliance Hotline. “Improper payment” is any payment that can be considered to influence a commercial decision or that can be understood as an attempt to obtain an advantage.

For more information, see the Company's Anti-Corruption and Anti-Bribery Policy.

Third party management

If you manage relationships with third parties, make sure they are aware of their ethical and compliance obligations. Misconduct by business partners, such as suppliers, consultants, sales representatives and customers, may pose significant liability and reputational risks to the Company.

Each department responsible for a business partner relationship must report to the Legal department any conduct that does not comply with the law or our regulations and policies. You must also obtain written pre-approval from the Legal department before entering into any agreement with any third party who will have contact with a government official on the Company's behalf.

For more information, please check the Company's Anti-Corruption and Anti-Bribery Policy.



Keeping accurate and complete records

Business partners, government officials and the public depend on our accurate and complete business records and disclosures. This information is also essential within the Company so that we can make good decisions.

To ensure that our books and records can serve these various purposes, they must comply with accepted accounting principles and our internal controls. Employees whose role covers financial or operational records have a special responsibility in this area, but we all contribute to the process of recording business results and maintaining records.

ALWAYS KEEP THIS IN MIND:

- Follow applicable laws and policies when creating, retaining, or destroying documents, including those in electronic formats.
- Please understand that you are responsible for the accuracy and veracity of the records you submit.
- Immediately report any improprieties in accounting, internal controls or auditing to the Legal department.
- Keep your records organized so they can be located and retrieved when needed.

For more information, see the Company's Records Retention Policy.

Mandatory retention

Company records should only be destroyed in accordance with applicable Company policy and in response to expected investigation, audit or legal action. To meet these requirements, we must make sure that the records we destroy do not fall into any mandatory retention situations.

Please contact Legal if you have any questions about whether or not a record can be destroyed.

Treating our business partners fairly

Our suppliers, service providers and business partners make significant contributions to our success. To create an environment where they have an incentive to continue working with us, they must be confident that they will be treated legally and ethically.

We adopt a policy of purchasing supplies and selecting business partners based on need, quality, service, price, terms and other conditions. We work with others who share similar values and our commitment to safety, quality, diversity, ethics and compliance. We also expect all suppliers to comply with the [Supplier Code of Conduct](#).

We respect the intellectual property rights of our business partners and other external parties. Intellectual property rights encompass patents, licenses, trademarks and logos, service marks, trade secrets, proprietary and confidential information, and other forms of intellectual property.

ALWAYS KEEP THIS IN MIND:

- Make supplier-related decisions in the best interest of the Company, not for your or a family member's personal gain or benefit.
- If you are in a leadership position and supervise our business partners, make sure they understand and meet our expectations for ethics and compliance, as well as all contractual obligations.
- Be alert for signs that our business partners are violating laws or regulations.
- When we hire former employees of competitors, we respect their obligations not to use or disclose their former employers' confidential information.
- Protect business partners' confidential and proprietary information.
- If you become involved in any situation that may appear to be a conflict with a business partner, discuss the matter with your supervisor or the Legal or Human Resources department.



Unwavering integrity

We operate with integrity and are committed to following all regulations, rules and laws applicable to our business. Not only is it the right thing to do, it helps maintain and protect our reputation.

As we operate in more than one country, we need to be aware of the different laws and customs that apply. While we respect the standards of our customers, business partners and co-workers, all employees must, at a minimum, comply with the standards and principles of this Code, unless they are inconsistent with local law. In this case, you should seek guidance from the Legal department.

Main definitions

Bribery – offering or receiving undue value (or offering to do so) to influence the behavior of someone in government or business to obtain a business, financial or commercial advantage.

Corruption – the abuse of entrusted power for private gain.

Facilitation payments – payments to a public official that are intended to encourage the official to carry out his or her responsibilities.

Anti-bribery and anti-corruption

Bribery and corruption in all its forms are completely contrary to Our Values and our business standards. We not only comply with anti-bribery regulations and laws, but we do everything possible to ensure that our business partners share our commitment.

ALWAYS KEEP THIS IN MIND:

- Do not offer or accept bribes or kickbacks; do not offer facilitation payments or “wetting your hand”; do not offer or accept any other type of undue benefit.
- Maintain accurate books and records so that payments are honestly described and Company resources are not used for illegal purposes.
- Obtain prior written approval from the Chief Compliance Officer before giving any item of value to a public official.

For more information, see the Supplier [Code of Conduct](#).





Political activities

We believe in the right of employees to participate in the political process. You are encouraged to be politically active as an individual citizen on your own time and at your own expense.

In accordance with applicable laws and policies, the Company will exercise its right and responsibility to make its position known on these issues.

ALWAYS KEEP THIS IN MIND:

- Make it clear that your political views and actions are yours and not those of the Company.
- Never use Company resources, assets or facilities to support any candidate or political party unless specifically permitted by law and expressly authorized by the Chief Compliance Officer.
- Never pressure another employee or business partner to contribute, support or oppose any candidate or political party.
- Holding or campaigning for political office must not create or appear to create a conflict of interest with your duties.
- Do not solicit contributions or distribute political literature during business hours.
- Never make a political or charitable contribution with the intention of unduly influencing someone.

Fair competition and antitrust

We believe in free and open competition. We gain our competitive advantages through superior products and processes, rather than through unethical or illegal business practices.

The countries in which we operate have laws that prohibit practices that interfere with competition. These laws are complex. If you have any doubts about the legality of a particular practice, do not take any action without first seeking guidance and approval from the Legal department.

ALWAYS KEEP THIS IN MIND:

- Familiarize yourself with how competition laws may affect your work and how they apply in the jurisdictions where you work.
- If you find yourself at a meeting, including trade association meetings, where a suspicious conversation is taking place, state that you believe the discussion is inappropriate, remove yourself from the discussion, and immediately inform the Legal department. Also, make sure your opposition to inappropriate conversation is noted in the meeting minutes, if there are any.

For more information, see the Company's Antitrust Policy.

Antitrust “warning signs”

Competition or antitrust laws are complex and compliance requirements may vary depending on the circumstance, but in general, the following activities are examples of “red flags” and should be avoided and reported immediately:

- Participate in anti-competitive agreements with competitors, including price fixing, bid rigging, market allocation and agreements to restrict supply.
- Exchange competitively sensitive information with competitors.
- Impose restrictions on customers or suppliers.
- Abuse a position of market dominance.

Misuse of privileged information

In the course of business, you may learn material non-public information about other publicly traded companies.

Using this information for personal gain, sharing it with others, or spreading rumors is illegal.

Main definitions

It is considered **information relevant** if an investor would likely want to know or benefit from having the information before making an investment decision, or, if disclosed, it would have an impact on the price of a security.

Information is **non-public** if it has not been widely disseminated to the market, for example, through widely publicized company communications or press releases.

ALWAYS KEEP THIS IN MIND:

- Never buy or sell securities of any company based on material non-public information.
- Do not transmit material non-public information or give “tips” to others.
- When trading, be careful, even if you “think” you are not relying on material non-public information.

Working with the government

Special rules apply when the government is our customer or business partner. We may face severe penalties, including loss of current and future public contracts, penalties and even criminal charges for violating procurement laws.

ALWAYS KEEP THIS IN MIND:

- When working with a government, be aware of its policies and ours. Learn how his policies may impact our business relationship.
- Please contact the Legal department regarding non-routine government information requests.
- If you suspect illegal or unethical conduct by an employee or business partner in connection with a public contract, report the matter immediately to the Legal department.

Global trade

We comply with the commercial laws of all countries in which we operate, including economic sanctions and import and export laws. Most countries in which we operate impose various import/export trade restrictions.

ALWAYS KEEP THIS IN MIND:

- Products intended for import or export must be classified in advance and all labels, licenses, approvals and documents must be provided.
- Trade sanctions, including financial sanctions, are complex. If you are involved in transactions, such as doing business with a sanctioned country, entity or person, you must ensure compliance with applicable trade laws. If you have any questions, please contact the Legal department.

Clarity and sincerity in our public communications

We need a clear, coherent and truthful voice when providing information to the public and the media. For this reason, it is important that only formally designated employees speak to the press on behalf of the Company.

ALWAYS KEEP THIS IN MIND:

- Unless you are authorized to do so, never give the impression that you are speaking on behalf of the Company in any communication that may be made public.
- If you are contacted by the media or members of the investment community, refer them to the Legal department for a response.
- Exercise common sense when using social media, including when expressing ideas and opinions in a respectful manner. Ultimately, you are solely responsible for your publications on the internet.
- If you see something online that could be potentially harmful to the Company, report it to the Legal department immediately. Don't respond to negative comments.

Our policies do not prohibit employees from disclosing or discussing information about terms and conditions of employment (such as wages) as long as employees did not obtain the information through the access they had as part of their formal job duties.
their positions.

This Code and our policies are designed to protect the Company and its employees and not to restrict the flow of useful, appropriate and protected information.

Improving our world

Supporting our communities

We have a reputation for being good citizens and neighbors. We believe in maintaining the health and well-being of the communities where we live and operate, and recognize that charitable contributions and volunteerism are important components of this commitment.

ALWAYS KEEP THIS IN MIND:

- If you personally volunteer to help charitable organizations, please ensure that your participation does not interfere with your ability to fulfill your professional obligations.
- You may not solicit or pressure customers, business partners, or other employees to support your favorite charities or causes.
- Organizations (NGOs) ~~governments~~ have a legitimate interest in what we do as a Company. If you are contacted by an NGO, be sure to consult the Legal department before responding.

Respecting human rights

We conduct our business in a way that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights. We will not tolerate human rights abuse in our operations or in our supply chain.

We act in accordance with the United Nations Global Compact. We also observe global standards such as the Universal Declaration of Human Rights, the International Labor Organization (ILO) Core Labor Standards, the Organization for Economic Co-operation and Development (OECD) Guidelines in relation to multinational organization, along with all regulations and applicable local laws, in addition to local custom in defining Company standards in various jurisdictions.

ALWAYS KEEP THIS IN MIND:

Each of us can help support efforts to eliminate abuses such as child labor, slavery, human trafficking, and forced labor:

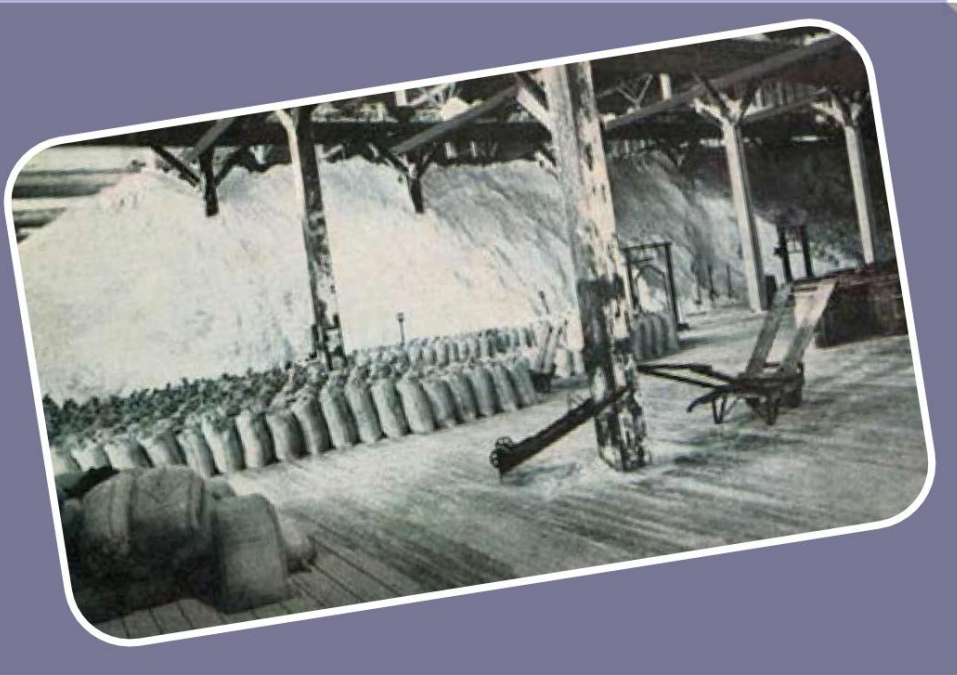
- Report any suspicion or evidence of human rights abuses in our operations or the operations of our business partners.
- Remember that respect for human dignity begins with our daily interactions with each other and our business partners.

Protecting the environment

Sustainability is an integral component of our business strategy. We are committed to minimizing harm to the environment, as well as any potential harm to the health and safety of employees, business partners and our communities. We are also committed to being responsible for natural resources and carbon reduction.

ALWAYS KEEP THIS IN MIND:

- Do your part to ensure that protecting the environment is a priority. Contact your supervisor if you think your work is likely to cause harm to the environment.
- Read and understand all information provided by the Company that is relevant to your work regarding the safety, health and environmental effects of our products and chemicals in the workplace, as well as information on how to handle and use them with safety .
- Cooperate fully with all environmental and compliance reviews of our products and operations.
- If you have any questions about compliance with environmental, health and safety laws and policies, please contact the Legal, Environmental or Health and Safety department.
- Be proactive and look for ways to reduce waste and use energy and natural resources more efficiently.



Administration of this Code

We also expect anyone acting on our behalf to act consistently with our Code. This includes our business partners, contractors, employees, service providers, suppliers and third-party representatives. Appropriate action may be taken if a business partner fails to comply with applicable standards or its contractual obligations.

If you are unsure whether you are covered by the Code, contact your supervisor or the Legal or Human Resources department.

Use and administration of this Code

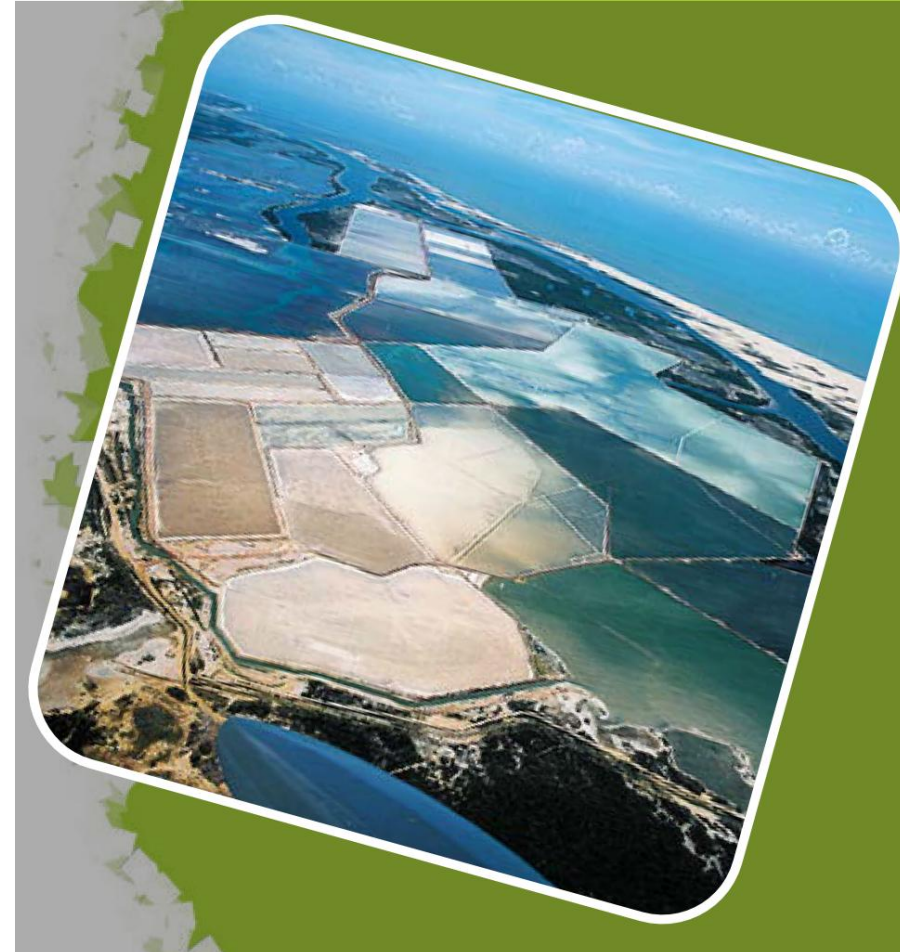
The General Counsel administers this Code and encourages you to use this Code as a resource. It is intended to help you apply our standards and serve as a first source of information. If you require further information and guidance, please contact your supervisor or the Legal or Human Resources department.

Once a year, each employee without union representation must declare that he or she has read and understands the Code, complies with it, and is unaware of any unreported violation of the Code.

Those who supervise others must also declare that each supervised employee is in compliance with the Code and has completed compliance program training and all other required supplemental training modules.

Exemptions and exceptions

Only the General Counsel has the authority to grant exemptions or exceptions from the requirements of this Code. No other supervisor or manager has this authority. Any material change to or waiver of any provision of this Code must be approved in writing by the General Counsel and immediately disclosed in accordance with the requirements of applicable regulations and laws.



OUR VALUES

INTEGRITY



EMPOWERMENT



EXCELLENCE



TEAM WORK



AGILITY



Contact us

The Legal department is available to help you with any questions you may have about the Code or the company's compliance policies. We are also available if you would like to discuss or report any potential violations. You can contact us directly using the following means:

Compliance Hotline: <https://>

mortonsalt.ethicspoint.com (Bahamas, USA) <https://>

sdb.ethicspoint.com (Brazil) <https://>

splchileperu.ethicspoint.com (Chile, Peru) <https://>

windsorsalt.ethicspoint.com (Canada)

Email:

compliance@mortonsalt.com

Mail: Morton Salt Legal

Department, Inc.

444 West Lake Street, Suite 3000

Chicago, Illinois 60606

Telephone:

+1 312 807-2000 (Bahamas, Canada, USA)

+56 2 469-6221 (Brazil, Chile, Peru)

Ask to speak to the Legal department

