

**POLICY STATEMENT AND SCOPE** - Compass Minerals International, Inc. and its subsidiaries and affiliated companies ("Compass Minerals") is committed to operating in a responsible and ethical manner. This Supplier Code of Conduct (this "Code") sets forth our standards to ensure that organizations providing goods and services to us share our commitment to ethical business behavior. This Code applies to our suppliers, vendors and distributors, as well as their representatives, employees, subcontractors and agents (collectively, "Suppliers").

**INTEGRITY** - At Compass Minerals, we operate in a fair and transparent manner, embracing the highest ethical standards in everything we do. We expect our Suppliers to embrace our value of *Integrity*, including in the following ways:

- <u>Compliance with Laws</u>. Suppliers must conduct business in full compliance with all applicable laws, regulations and rules that apply to them and their business wherever they operate ("Laws").
- <u>Conflict of Interest</u>. Suppliers must compete fairly and ethically for our business without using a familial or personal relationship with Compass Minerals employees to secure an improper benefit or advantage or otherwise exploit a conflict of interest.
- <u>Gifts</u>. Suppliers must not offer Compass Minerals' employees any gifts, favors or entertainment of more than nominal value that could inappropriately influence, or appear to influence, the employees' business judgment.
- <u>Anti-Corruption; Trade Controls</u>. Suppliers must never offer bribes, kickbacks or other improper payments or incentives, directly or indirectly, in connection with seeking Compass Minerals' business. Suppliers must fully comply with all applicable anti-corruption Laws, specifically including but not limited to the U.S. Foreign Corrupt Practices Act, Brazil's Clean Company Act and the U.K. Bribery Act, and with all import and export control Laws.
- <u>Competition</u>. Suppliers must compete honestly based on the quality of their products or services and never engage in or support unfair or illegal business practices that violate applicable competition or antitrust Laws.

**RESPECT** - At Compass Minerals, we are committed to creating a diverse, safe and inclusive organization where all are treated with dignity. We expect our Suppliers to embrace our value of *Respect*, including in the following ways:

- <u>Discrimination and Harassment</u>. Suppliers must promote equal opportunity and maintain an inclusive workplace free from discrimination and harassment.
- <u>Child and Forced Labor</u>. Suppliers must not use or tolerate the use of child labor (as defined by the International Labour Organization (ILO)), any form of forced labor or any form of human trafficking.
- <u>Freedom of Association</u>. Suppliers must respect employees' right to organize and bargain collectively without fear of intimidation, harassment or retaliation.
- <u>Compensation; Working Conditions; Work Authorization</u>. Suppliers must meet all legal requirements for employee compensation, benefits, working hours and working conditions and will only employ workers with legal authorization validated by appropriate documentation.
- <u>Health and Safety</u>. Suppliers must provide safe and healthy working conditions at their facilities and take proactive measures to promote accident prevention and mitigation of health risks. In addition,



Suppliers must ensure a workplace free from violence and intimidation.

**SUSTAINABILITY** - At Compass Minerals, we are committed to responsible stewardship across our entire value chain and strive to adhere to our corporate sustainability principles. In addition to complying with all environmental Laws, Suppliers must promote sustainability and conduct their business in a way that minimizes the impact of their operations, products and services on the environment, particularly in the areas of water use, energy use, greenhouse gas emissions and solid waste.

**RECORD KEEPING** - Suppliers must maintain books and records that reflect all transactions and financial matters in an accurate, honest and timely manner, comply with all Laws and all obligations to us, and employ appropriate audit processes.

## INFORMATION AND ASSETS

- <u>Confidential Information</u>. Suppliers must protect all of Compass Minerals' confidential information to which they have access, including all intellectual property, and must safeguard any Compass Minerals' property in their possession or under their control. Suppliers should not trade in securities, or encourage others to do so, based on confidential information received from Compass Minerals. If a Supplier believes it has been given access to Compass Minerals' confidential information in error, the Supplier should immediately notify its contact at Compass Minerals and refrain from further distribution of the information. This obligation to preserve Compass Minerals' confidential information is ongoing, even after the business relationship ends. Similarly, Suppliers should not share information related to other entities with anyone at Compass Minerals if the Supplier is under a contractual or legal obligation not to disclose such information.
- <u>Data Privacy</u>. Suppliers must comply with all data privacy Laws and Compass Minerals' published policies on data privacy.

**COMPLIANCE** - We expect Suppliers to comply with this Code and to demonstrate compliance upon request. We may request access to Supplier records or facilities to monitor compliance and to confirm correction of any deficiencies identified. Failure to comply with this Code or such requests may result in alteration or termination of a Supplier's relationship with us.

**REPORTING** - We expect Suppliers to communicate the standards of this Code to their employees, agents and subcontractors and anyone acting on their behalf in providing goods and services to us. Suppliers should immediately report any known or suspected violations of this Code and any significant environmental, health or safety matters that could impact Compass Minerals directly to the Compass Minerals' Global Legal Team at legal@compassminerals.com. A Supplier's relationship with us will not be affected by a report of potential misconduct made in good faith.

**Note:** This Code contains general requirements applicable to all Suppliers. Particular Supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code supersedes any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the other provision will control.

