Code of Business Conduct & Ethics
Continuing Our Tradition of Integrity
We are a team. What unites us is a shared understanding: that we win as one.

We are driven to make great things happen. Results matter – and so does the journey we take to get them.

We are a trusted name. And we must always live up to it. So we do good and we do what’s right – no matter what.

We are ambitious. So we don’t settle for second best. We set big goals and we achieve them.

We believe anything is possible. So we limit less and imagine more. Because we can make a difference.
A Message from Christian Herrmann

Today’s business environment is complex and much has changed in recent years. But one thing that has remained constant throughout our history is the belief that maintaining our good reputation depends on each of us being personally responsible for our conduct.

Wherever we are, and whatever situations we face, we need to ensure that our actions demonstrate our commitment to respect and dignity, and are based on the thoughtful application of Our Values, which are the foundation of our company culture.

That is why I am enthusiastic about our new Code of Business Conduct and Ethics (“Code”). It provides you with more help and information about our responsibilities, including complying with the law so that we can consistently and efficiently apply Our Values in business situations.

Of course no Code can answer every question or address every scenario, which is why we have resources in place when additional direction is needed. These resources include, but are not limited to, The Core Values of K+S Group, K+S Directives, and all company policies. If you are unsure of what to do in a particular circumstance or you are concerned that this Code or our policies are not being followed, I need you to bring that to our attention. Compliance is everyone’s responsibility.

I believe the integrity of our people and our commitment to Our Values will not only enable us to succeed today but more important will help us achieve long-term success. Let’s work together and follow our Code so we can live up to the proud legacy of our company.

Christian Herrmann
Chief Executive Officer
Morton Salt, Inc.
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We Are Guided by Our Values

Applying Our Values
Our success begins with Our Values. Our Values are the foundation of our company culture and help guide our decisions today and in the years to come. By following Our Values we will not only meet our goals, but we will continue to be proud of how we achieve success.

Our new Code of Business Conduct and Ethics ("Code") together with The Core Values and Principles of the K+S Group will help you apply Our Values and make good decisions in your day-to-day work. As you’ll see, the Code includes sections on our responsibilities, working together as a team, our commitment to safety and integrity, being open and transparent, supporting the communities where we live and operate, and understanding and following applicable laws.

Of course no code of conduct can cover every possible situation, which is why we will continue to rely on one another to use good judgment and to speak up whenever we have questions or concerns.

Who Must Follow Our Code
The Code applies to all officers, directors and non-bargaining unit employees of Morton Salt, Inc., K+S Windsor, Ltd., Morton Bahamas, Ltd., their subsidiaries and affiliates (the “Company”).

We also expect anyone acting on our behalf to share Our Values and act in a way that is consistent with our Code. This includes our business partners, contractors, part-time employees, vendors, suppliers, and third party representatives. Appropriate measures may be taken if a business partner fails to meet applicable standards or their contractual obligations.

If you are unsure whether you are covered by the Code, contact your supervisor, Human Resources, or the Legal Department.
Making the Right Choice

If you’re faced with an ethical dilemma and you’re not sure what to do, ask these questions:

- Is it aligned with all of Our Values?
- Does it comply with our policies?
- Is it consistent with our long-term goals and interests?
- Would I be comfortable with my decision if it were made public?

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

Closing the loop

Our ethics and compliance program must continually evolve to stay current with new and emerging risks and regulations. In order to help us stay up-to-date, once you’ve made a decision, ask yourself the following additional question:

Do you believe there are sufficient standards, policies and resources in place to address the issue you faced – or should more be done? If you believe more should be done, contact your supervisor, Human Resources, or the Legal Department. Your suggestions will help us improve our ethics and compliance program.

Use and Administration of This Code

The Chief Compliance Officer administers this Code, and encourages you to use this Code as a resource. It is intended to help you apply Our Values and standards and to serve as a first source of information.

In some instances you may need additional information and guidance from your supervisor or manager, Human Resources, or the Legal Department. You can also find additional information on specific topics in our training and communications material.

Once a year, each director, officer and non-bargaining unit employee must certify that they have read and understand the Code; is in compliance with the Code; and is unaware of any violations of the Code. Those who supervise others must also certify that each supervised employee is in compliance with the Code, and that they have completed the compliance program training as well as any other required supplemental training modules. This process is mandated by the K+S Directive on Compliance Management.

Complying with Laws and Regulations

We are committed to following all applicable laws, rules, and regulations that apply to our businesses. Not only is it the right thing to do, but it also helps maintain and protect our reputation.

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

Our Non-Retaliation Policy

Regardless of the type of misconduct reported or the method of reporting, we will not tolerate retaliation against anyone who makes a good faith report of an alleged violation of the law, this Code or our policies and procedures.

We take claims of retaliation seriously; they will be investigated and if substantiated, retaliators will be disciplined up to and including termination. If you believe you have been retaliated against, you should contact Human Resources or the Legal Department or any of the resources listed in this Code.
Thrive Together

We are a team. What unites us is a shared understanding: that we win as one.

There’s nothing more important to Morton Salt than health and safety. . . not production, not sales, not profit.
— Christian Herrmann

Looking Out for One Another’s Safety and Security

Nothing is more important than health and safety. We must be alert, disciplined, and always looking out for one another.

ALWAYS KEEP IN MIND:

- Only undertake work that you are qualified to perform.
- Be sure that your performance is not impaired by alcohol or by any drugs including prescription or over-the-counter medication.
- Speak up if you observe any unsafe working conditions and listen to others who speak up.
- Help contractors and others we work with to understand and follow our safety and security procedures.
- Report any accident, injury, or illness. Never assume that someone else has made the report.
- Know the emergency and security procedures that apply where you work.
- Threats, intimidation and violence undermine everything we stand for as an ethical company and will not be tolerated.
- Weapons are prohibited from being brought into the facilities and corporate offices.

Protecting the Environment

We are committed to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers and our communities.

ALWAYS KEEP IN MIND:

- Do your part to ensure that protecting the environment is a priority. Stop work if you believe it is likely to result in damage to the environment.
- Read and understand all the information provided by the company and relevant to your job on the safety, health and environmental effects of our products and workplace chemicals as well as information on how to handle and use them safely.
- Fully cooperate 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, contact the Environmental, Health and Safety or Legal Departments.
- Be proactive and look for ways that we can reduce waste and use energy and natural resources more efficiently.
Building Teamwork Through Diversity and Respect

We work best when we work as a team, when we treat one another with dignity and respect, and value the unique contributions of others.

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, genetic information, citizenship, or any other characteristic protected by law.

ALWAYS KEEP IN MIND:

- Treat others with respect.
- Help create an inclusive environment where everyone can contribute, develop and fully utilize their talents.
- Keep an open mind to new ideas and listen to different points of view.
- Understand that offensive messages, derogatory remarks and inappropriate jokes are inconsistent with our culture and beliefs and are never acceptable.
- Inform others we work with of our expectation that they act in a way that is consistent with our sense of fair treatment and equal opportunity.

Our Workplace Is Free from Harassment and Intimidation

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

- Do not stand by and watch or encourage harassment. Report incidents of harassment or intimidation using any of the resources listed in this Code.
- Understand that inappropriate comments of a sexual nature or any other sexually offensive behavior will not be tolerated.
- Remember that we expect you to follow this Code, any workplace policies, and the law any time that you are at work or representing the Company in any capacity.

K+S AKTIENGESELLSCHAFT (K+S AG)

The Early Years

The beginning of the K+S AG can be traced to the mid-19th century and the early years of the potash and fertilizer industry in Germany. Over a century later, surviving political crisis and competition, K+S AG emerged as a remarkable success story. It is now a growth-oriented company that extracts raw materials and processes them into products used worldwide. In 2009 we became part of K+S AG.
Protecting the Privacy and Confidential Information of Others

In recent years, individuals, companies and governments have grown increasingly concerned about the privacy and security of personal information. As a result, laws protecting the privacy of personal information and how it may be collected, shared, and used are becoming more common.

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

ALWAYS KEEP IN MIND:

- Keep personal information safe and secure.
- Use care when you provide personal and confidential data to anyone inside or outside the company and limit access to authorized individuals.
- When we use third parties to provide services for us, make sure they understand the importance we place on privacy and that they must uphold our standards.

WINDSOR SALT
The Early Years

1893 It was 1893, in Windsor (Ontario), when three employees of the Canadian Pacific Railway Company launched a subsidiary named The Windsor Salt Company Limited. Within a few years, the fledgling operation was sold and became The Canadian Salt Company Limited. Over the years, the Company has changed hands but has remained a leader in modern salt processing methods. Today, the company is known as K+S Windsor Salt Ltd. and it is Canada’s largest salt manufacturer.
Step Up

We are driven to make great things happen. Results matter – and so does the journey we take to get them.

Asking Questions and Reporting Possible Violations

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

When you speak up to ask a question or report questionable conduct, you are protecting your colleagues, and the reputation of the Company. Remember, an issue cannot be addressed unless it is brought to someone’s attention.

Where to Go for Help

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

- In most instances it will be best for you to first talk to your supervisor or manager. They will be familiar with the laws, regulations and policies that relate to your work.

Using the Compliance Hotline

The Compliance Hotline (866-215-5366) is multilingual, toll-free and available seven days a week, 24 hours a day.

Calls are answered by an outside service, and your caller ID information is not recorded. You do not need to reveal your identity, but you should give enough specific information to enable a complete investigation of the issue you are reporting.

The Hotline operator forwards your report to Human Resources and the Legal Department for investigation. When you call the Hotline, you receive a tracking number and a time to call back for an update on your report or the answer to your question.

As an additional resource, Hotline reports can be made online at https://mortonsalt.ethicspoint.com. This method functions the same way as calling the Hotline number. Reports can remain anonymous if you choose and you will receive a tracking number to receive updates.
If you are not comfortable talking with your supervisor, talk to your supervisor’s manager or you can contact Human Resources or the Legal Department.

If you report an issue to management or to a representative from Human Resources or the Legal Department, you can request that your report remains confidential. In doing so, you are requesting that your identity will not be revealed. However, in some instances, your identity might need to be revealed in order for an investigation or legal proceeding to move forward.

If none of the above steps resolves your questions or concerns, or if you prefer, at any time you can call the Compliance Hotline. All calls are confidential, and you may remain anonymous where allowed by local law.

Cooperating with Investigations
All employees have a responsibility to fully cooperate with all investigations and audits; this includes internal investigations and audits as well as those initiated by government authorities. More harm can be done to the company’s reputation as well as your reputation if you mislead investigators or fail to disclose what has been done than if you present the facts fully and honestly.

Immediately contact your supervisor or the Legal Department for additional guidance if you are contacted by a government official conducting any kind of investigation.

Accountabilities and Discipline
Violations of this Code, our policies, laws and regulations can result in serious consequences for you individually and to the company. Violations may result in disciplinary action up to and including termination of employment.

Others involved in the wrongdoing may also be subject to discipline. This includes those who fail to use reasonable care to detect a violation, persons who refuse to divulge information which may be material to an investigation, as well as supervisors who approve, “look the other way,” or attempt to retaliate.

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

Waivers and Exceptions
Any material amendment or waiver of any provision of this Code must be approved in writing by the Chief Compliance Officer and promptly disclosed in accordance with the requirements of applicable laws and regulations.

MORTON SALT
The Early Years

1848 Morton Salt’s roots date back to 1848 when Alonzo Richmond launched his Chicago salt business: Richmond & Company.

The firm was incorporated as the Morton Salt Company in 1910 by the new owners, the Morton family. By then the company was both a manufacturer and a merchant of salt. Among its products were a free-flowing salt in a round blue package with a patented spout for consumer households, and various bulk salt grades for farm and industry.
Do the Right Thing

We are a trusted name. And we must always live up to it. So we do good and we do what’s right — no matter what.

Employee Responsibilities

All of us have a role to play in protecting our reputation and integrity. Each of us is expected to:

- Work as a team and treat others respectfully.
- Always act in a professional, honest and ethical manner when acting on behalf of the company.
- Be familiar with the information contained in this Code as well as applicable laws and with company policies. Pay particular attention to the policies that pertain to your job responsibilities.
- Promptly report concerns about possible violations of laws, regulations, this Code and policies to your supervisor or to 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, officer, supervisor or manager you are expected to meet these additional responsibilities:

- Be a role model for ethical leadership and support your team members when they ask questions and raise ethical concerns:
  - Create an environment where individuals feel comfortable speaking up.
  - Listen and respond to concerns when they are raised.
  - Make sure that no one who speaks up suffers retaliation.
- Help your team members understand the requirements of our Code, policies and applicable laws.
- Be consistent when enforcing our standards and holding people accountable for their behavior at work.
- Make a sincere effort to keep up with regulatory changes that affect your areas of responsibility.
- Never ask or pressure anyone to do something that you would be prohibited from doing yourself.
- If you manage third party relationships, ensure that they understand their ethics and compliance obligations.
**Avoiding Conflicts of Interest**

A conflict of interest may occur when your actions or personal interests make it difficult to perform company work or exercise best judgment objectively and effectively in support of the company’s interests.

**ALWAYS KEEP IN MIND:**

It is impossible to describe every potential conflict, but the following are some examples:

- Holding an outside job or affiliation with a competitor, customer or supplier.
- Being in a position to oversee, hire or steer business to a relative.
- Taking advantage of business opportunities you discover through the use of company property, information or your position.
- Having significant investments in a competitor or business partner.

Each of us is expected to be proactive and whenever possible avoid situations that can lead to even the appearance of a conflict, but if you find yourself in a potential conflict of interest, talk with your supervisor, Human Resources, or the Legal Department. Depending on the circumstances, some conflicts may be resolved if they are proactively disclosed and handled properly.

**Exchanging Gifts and Entertainment**

We do not accept or provide gifts or entertainment if the intent is to bias a decision or in return for any business, services or confidential information.

**ALWAYS KEEP IN MIND:**

As a general rule, gifts or entertainment of nominal value (not exceeding the equivalent of US $100) may be given or accepted, but in all cases, the following conditions must be met:

- Gifts or entertainment are only to be given or accepted if:
  - The gift cannot be reasonably construed as payment or consideration for influence or reward for a decision or action.
  - It does not violate applicable law.
  - If it was disclosed to the public, it wouldn’t embarrass you or the company.

- The following practices are never allowed:
  - Giving or accepting any gift of cash or a cash equivalent (gift cards, gift certificates);
  - Giving or accepting any gift or entertainment that could reflect negatively on our reputation or your reputation.
  - Any gift or entertainment that violates the policies of the recipient’s organization.

- For more information, see the [K+S Directive on Extending and Accepting Gifts](#).

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**Extra care needs to be taken when dealing with government officials.**

- No gifts or other benefits, including entertainment, can be offered to government officials without the prior written approval of the General Counsel or Chief Compliance Officer.

- Any request made to an employee by a government official for an improper payment must be reported immediately to the Chief Compliance Officer or the Legal Department. An improper payment is any payment that can be considered as influencing any business decision or that could be seen as an attempt to obtain an advantage.
Keeping Confidential Information Safe and Secure

One of our most valuable assets is information. The unauthorized release of confidential information can cause us to lose a critical competitive advantage, embarrass the company and damage our relationships with our customers and business partners.

For these reasons, confidential information must be treated carefully. This means it must be accessed, stored and transmitted in a manner consistent with our policies and procedures.

ALWAYS KEEP IN MIND:

- Use and disclose confidential information only for legitimate business purposes.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.
- Protect the confidential and proprietary information of business partners.
- Never discuss confidential information when others might be able to overhear what is being said (for example on planes, elevators and when using mobile phones in non-private spaces) and be careful not to send confidential information to unattended fax machines or printers. Also, be sure to check the accuracy of email addresses and consider using encryption when communicating confidential information via email.

Confidential information

Confidential information includes all non-public information or trade secrets that might be of use by competitors, or harmful to the company or its business partners, if disclosed. This includes:

- Employee information (names, addresses, home phone numbers, salary or wages, medical data and personnel 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.

MORTON BAHAMAS

The Early Years

1935 The arrival of the three Erickson brothers to the island of Inagua ushered in the era of mechanized salt production. Their ingenuity, dedication, and plain hard work began what is today nearly 30,000 acres of salt ponds. The Ericksons oversaw the creation of much of the operation’s infrastructure. Sold to Morton International in 1955 and renamed Morton Bahamas Ltd., the Erickson brothers would be proud that the Inagua site is now one of North America’s largest saline operations, yielding over a million short tons of salt per year.
Maintaining Accurate and Complete Records

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

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

ALWAYS KEEP IN MIND:

- Follow applicable laws and our policies when creating, retaining or destroying documents including those in electronic formats.
- Understand that you are accountable for the accuracy and truthfulness of the records you produce.
- Report immediately any improprieties in accounting, internal controls, or auditing to the Chief Compliance Officer.
- Keep your records organized so they can be located and retrieved when needed.

Retention Holds

Documents should only be destroyed in accordance with our Records Management Policy and never in response to or in anticipation of an investigation, audit, claim, lawsuit or arbitration proceeding.

Contact the Legal Department if there is any doubt about the appropriateness of record destruction.

Using Our Assets Wisely

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

Company assets can 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 and funds.

ALWAYS KEEP IN MIND:

- Make sure our assets are not lost, damaged, or misused.
- Guard our intellectual property – and respect the intellectual property rights of others.
- Email and voicemail systems and the content on them are considered company property and depending on their content can also be company Records, which must be maintained as required under the Records Management Policy.
- You are expected to use our property for business purposes only, but limited personal use of phones and computer systems is allowed as long as it does not have a negative impact on performance or productivity, or violates any company policies.
Play to Win

We are ambitious. So we don’t settle for second best. We set big goals and we achieve them.

When we play to win, we know that it’s just as important that we win the right way.
— Chad Walker, Vice President, General Counsel & Chief Compliance Officer

Anti-Corruption and Bribery
Bribery and corruption in all of its forms are completely contrary to our Values and business standards.

Not only do we comply with anti-bribery laws and regulations, we do all we can to make sure that our business partners share our commitment.

ALWAYS KEEP IN MIND:
- Do not give or accept bribes or kickbacks; offer facilitation or ‘grease’ payments; or give or accept any other kind of improper payment.
- Keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes.
- It is especially important that we carefully monitor third parties acting on our behalf. We must know who they are and what they are doing. If you manage third parties make sure they understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

Key Definitions

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

Corruption - the abuse of an entrusted power for private gain.

Facilitation payments - payments to a government official that is intended to encourage the official to perform his responsibilities.
**Political Activities**
We believe in the right of employees to participate in the political process. You are encouraged to be politically active as individual citizens on your own time and at your own expense.

Consistent with applicable laws and policies the Company will exercise its right and responsibility to make its position known on relevant issues.

**ALWAYS KEEP IN MIND:**
- Make it clear that your political views and actions are your own and not those of the company.
- Never use company funds, assets, or facilities to support any political candidate or party unless specifically permitted by law and expressly authorized by the General Counsel.
- Never pressure another employee, or business partner to contribute to, support or oppose any political candidate or 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 work hours.
- Never make a political or charitable contribution with the intent to improperly influence someone.

These laws are complex. If you have a question about the legality of a certain practice, do not take any action without first seeking guidance and approval from the Legal Department.

**ALWAYS KEEP IN MIND:**
- Be familiar with how competition laws may impact your job and how they apply in the jurisdictions where you work. If you have any questions consult the Legal Department.

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**Anti-trust “red flags”**

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

- Entering into anti-competitive agreements with competitors, including price fixing, bid rigging, market allocation and agreements to restrict supply.
- Exchanging competitively sensitive information with competitors.
- Imposing restrictions on customers or suppliers.
- Abusing a position of market dominance.
- Entering into unauthorized mergers and acquisitions.
- If you find yourself in a meeting, including trade association meetings, where a questionable discussion is taking place, state that you believe the discussion is inappropriate, break away from the discussion, and promptly inform the Chief Compliance Officer or the Legal Department.

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**Fair Competition and Antitrust**

We believe in free and open competition. We gain our competitive advantages through superior products and an uncompromising brand reputation rather than through unethical or illegal business practices.

The U.S., Canada, Bahamas and other countries have laws prohibiting practices that interfere with competition.
Insider Trading

In the course of business, you may become aware of material non-public information about our parent company, K+S AG, or other publicly traded companies. Using this information for personal gain, sharing it with others, or spreading false rumors, is illegal.

**Key Definitions**

Information is **material** if it is likely that an investor would want to know or benefit from having that information ahead of making an investment decision, or if disclosed, it would have an impact on the pricing of a security.

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

**ALWAYS KEEP IN MIND:**

- Never buy or sell any securities of any company based on material, non-public information.
- Do not pass on material, non-public information or “tips” to others.
- When trading, use care even if you ‘think’ you are not relying on material, non-public information.
- For more information, see the [K+S Directive regarding Insider Trading](#).

Working with the Government

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

**ALWAYS KEEP IN MIND:**

- When working with a government, be aware of their policies as well as ours. Know how their policies may impact our business relationship.
- Contact the Legal Department regarding non-routine government requests for information.
- If you suspect any illegal or unethical conduct by an employee or business partner in connection with a government contract, report it immediately to the Legal Department.

Global Trade

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

**ALWAYS KEEP IN MIND:**

- Products intended for import or export must be classified in advance, and all required labeling, documentation, licenses and approvals completed.
- Trade sanctions, including financial sanctions, are complex. If you are involved in transactions, such as business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws. If you have questions, contact the Legal Department.
Think Big

We believe anything is possible.
So we limit less and imagine more.
Because we can make a difference.

Supporting Our Communities

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

ALWAYS KEEP IN MIND:

- If you, personally, volunteer to help charitable organizations, be sure that your participation does not interfere with your ability to satisfy your work duties.
- Soliciting or pressuring customers, business partners, or other employees to support your favorite charities or causes is not allowed.
- Non-governmental organizations (NGOs) often have an interest in what we do as a company. If you are contacted by an NGO, be sure to consult with the Communications Department.

Respecting Human Rights

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

ALWAYS KEEP 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 in the operations of our business partners.
  - Remember that respect for human dignity begins with our daily interactions with one another and with our customers and includes promoting diversity and inclusion, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.
Treating Our Business Partners Fairly
Our suppliers, vendors and business partners make significant contributions to our success. To create an environment where they have an incentive to continue to work with us, they must be confident that they will be treated lawfully and in an ethical manner.

Our policy is to purchase supplies and select business partners based on need, quality, service, price, terms and other relevant conditions. We work with others who share similar values and our commitment to safety, quality, diversity, sustainability, ethics and compliance.

ALWAYS KEEP IN MIND:
- Protect the confidential and proprietary information of business partners.
- Make supplier-related decisions in the best interest of the company, not for any personal benefit or gain for you or a family member.
- If you are in a leadership position and oversee our business partners, make sure they understand and follow our expectations for ethics and compliance and all contractual obligations.
- Watch for any signs that our business partners are violating applicable law or regulations.
- If you become involved in any situation that may appear to be a conflict with a business partner, discuss the matter with your supervisor, Human Resources or the Legal Department.
- When we hire former employees of competitors, we respect their obligations not to use or disclose the confidential information of their former employers.

Being Clear and Candid in Our Public Communications
We need a clear and consistent voice when providing information to the public and the media. For this reason, it is important that only formally designated employees speak with the press on behalf of the Company.

ALWAYS KEEP 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 become public.
- If you’re contacted by the media or by members of the investment community, refer them to the Director of Communications or the Legal Department for a response.
- Use good judgment when using social media, including expressing ideas and opinions in a respectful manner. Ultimately, you are solely responsible for what you post online.
- If you see something online that could be potentially harmful to the Company, report it immediately to the Communications Department or the Legal Department. Don’t respond to negative comments yourself.

Our policies do not prohibit employees from disclosing or discussing information on terms and conditions of employment (such as wages) so long as the employee did not come into the possession of such information through access which the employee had as part of their formal job duties.

This Code and our policies are designed to protect the company and its employees rather than to restrict the flow of useful, appropriate, and protected information.
A Message from Chad Walker

We only win when we are All Together Now!

We value you, and we need your help to ensure that our Company keeps its promises to its employees and customers. We do that by consistently applying Our Values.

Our Values are the foundation of our Code. We use the Code to make sure that we all fully understand how our Company does business — across all languages, time zones, functions, and locations.

If you see something, say something. You are empowered to enforce this Code. If you see conduct that may not be consistent with Our Values, our policies, procedures, or the Code, then please do the following:

- Say something to your supervisor; and
- Say something to Human Resources — even if you’ve already told your supervisor; or
- Contact the Compliance Hotline at either 866-215-5366 (toll-free) or https://mortonsalt.ethicspoint.com.
- You can contact the Compliance Hotline anonymously in most cases.
- We will promptly investigate your complaint or answer your question, and report back.
- Remember, we will not retaliate against employees who make good faith reports.

Thank you for reading this Code. I hope that you will use it as a resource to assist you in your business decision making. Always keep in mind that our actions shape our company and its future. In light of this fact, it’s important that we remain committed to simultaneously achieving our business goals and honoring Our Values. This includes treating each other with the dignity and respect we deserve, which is key because we need an engaged and diverse team to succeed.

As Christian said, let’s work together and follow our Code so we can live up to the proud legacy of our Company.

Chad E. Walker
Vice President, General Counsel & Chief Compliance Officer
Morton Salt, Inc.
We are a team. What unites us is a shared understanding: that we win as one.

We are driven to make great things happen. Results matter – and so does the journey we take to get them.

We are a trusted name. And we must always live up to it. So we do good and we do what’s right – no matter what.

We are ambitious. So we don’t settle for second best. We set big goals and we achieve them.

We believe anything is possible. So we limit less and imagine more. Because we can make a difference.