

About EthicsPoint

Frequently Asked Questions

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global (independent third-party service provider) to assist management, employees and contractors to work together in addressing fraud, violations of law and company policy, and other misconduct in the workplace, all while cultivating a positive work environment. EthicsPoint is available 24 hours a day, 365 days a year.

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a report via either the telephone or the Internet.

May I remain anonymous?

Yes, if you request to remain anonymous when making your report, we will respect your request to the fullest extent reasonably possible under the law. If you request to remain anonymous, but the law in your jurisdiction doesn't allow that, we will inform you when you call the hotline. We understand the desire to remain anonymous, but encourage you to consider leaving your name so that the investigator can speak with you. Allowing the investigator to speak with you will help the investigation process.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Will EthicsPoint track the phone number I call from or my IP address or email address?

No. EthicsPoint does not log or track your phone number, IP address, or email address when you make a report. Only if you choose to provide your name and/or contact details to EthicsPoint will such information be included in a report.

I am concerned that the information I provide to EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. If you wish to remain anonymous and such option is available under your respective jurisdiction, you - as a reporting party - need to ensure that the substance of the report does not contain any information or reference that may reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

If I see a violation, shouldn't I just report it to my manager or human resources and let them deal with it?

When you observe some behavior that you believe violates our Code of Ethics, or any law or company policy, we encourage you to report it. We encourage you to first consider bringing your concerns to your manager, Human Resources, Legal Department, or any other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It's for this reason that the EthicsPoint hotline is available for employee and contractor use.

Why should I report what I know? What's in it for me?

We all have an interest in working in a safe, positive and ethical work environment. As employees of Nutrien, we are obligated to act in a respectful and ethical manner, and to let the appropriate people know if misconduct is occurring. As stated in the Code of Ethics, you are required to report any good faith concerns about potential violations, where permitted by local law. By reporting our concerns, we can help to promote and maintain a safe, positive and ethical work environment. It also helps to maintain our reputation and success as a company.

What happens to my report?

Reports are entered directly on the EthicsPoint (Navex Global) secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are responsible for evaluating the report, based on the type of violation and location of the incident. Each of these recipients has had training in keeping these reports in the utmost confidence. You are also protected from retaliation for reports made in good faith.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

The Code of Ethics requires you to report your concerns, where permitted by local law. EthicsPoint can help you prepare and file your report so it can be properly evaluated. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my supervisor or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint website or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again

either by internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you periodically check the status of your case, and bear in mind, most situations can be resolved, no matter how complex. You have the option to remain anonymous, if permitted by local law. If you choose, or are required by local law, to leave your name, an investigator will contact you for an interview and you will be invited to have any follow up conversations with the investigator while the investigation is ongoing.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

What happens to my report after I file it?

The Compliance team will evaluate it, and determine the appropriate handling of your report. In most cases, reports are assigned to internal or external investigators. If you choose, or are required by local law, to leave your name, you will be contacted by the investigator for an interview. Once the investigation is complete, the investigator will submit his or her report to management for approval. Depending on the nature of the allegations and the outcomes of the investigation, there may be restrictions, such as privacy laws, that prevent the Compliance team from providing the results to you.

How do I find out the status of my report?

When you file a report, you'll be given a report key number so that you can follow up on your report through EthicsPoint. The Compliance Department will communicate with you through EthicsPoint (if you choose to remain anonymous).