Code of Business Conduct and Ethics

Continuing Our Tradition of Integrity



OUR VALUES



INTEGRITY

- Act with fairness and honesty
- Never compromise ethics and values
- Drive a Zero Harm culture and believe all injuries are preventable



EMPOWERMENT

- Take initiative at every level
- Don’t fear mistakes, we learn from them
- Find ways to say “yes”, not excuses to say “no”



EXCELLENCE

- Be the market leader
- Embrace continuous improvement
- Are accountable to our commitments



TEAMWORK

- Respect others and diverse perspectives
- Listen and provide candid feedback
- Know our team members are critical to our success



AGILITY

- Act with urgency
- Are decisive, simple and efficient
- Try to get it right the first time
- Focus on results



Our Mission

To produce and deliver every form of **Salt** that enhances everyday life.

Our Vision

To be the world's best **Salt** producer and to deliver excellent results for our investors.

Welcome to our Code of Conduct!

In a highly interconnected world that's changing every day, it is important to have a shared understanding of what it means to be an ethical and responsible supplier of choice. We are only as good as our reputation, and maintaining a good reputation depends on each of us being personally responsible for our conduct. Regardless of where our employees are located, we must ensure that our actions demonstrate a commitment to our values and foster a culture that reflects those values.

This Code of Business Conduct and Ethics ("Code") will provide you with more help and information about our responsibilities so that we can apply our values consistently in business situations. No code of conduct can answer every question or address every situation, which is why we have resources in place when additional help or direction is needed. If you are unsure what to do in a particular circumstance, or you are concerned that this Code or our company policies are not being followed, please bring the matter to our attention. Talk to your manager or contact us through any of the channels outlined in this Code. Compliance is everyone's responsibility.

We believe the integrity of our people and our commitment to our values will not only enable us to succeed today but, more importantly, will also help us achieve long-term success. Working together and following our Code will help us live up to our proud legacy.



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This Code applies to SCIH Salt Holdings Inc. and its subsidiaries, including, among others:

+ Compania Minera Punta de Lobos
+ Empresa Marítima
+ Gunther Salt
+ Kissner Milling Company
+ Kissner USA Holdings
+ Lyons Salt
+ Magco
+ Morton Bahamas
+ Morton Salt
+ NSC Minerals
+ Salina Diamante Branco
+ Sociedad Punta de Lobos Perú
+ Sociedad Punta de Lobos
+ Detroit Salt
+ Tiger Calcium
+ Tiger Tanklines
+ Windsor Salt

(collectively, the “Company”).



A Common Ethical Standard

It is important that we all work together to ensure we share 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 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.

My Responsibilities

Each of us, wherever we are, have a role to play in protecting the Company's 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.
- Display and champion Our Values.
- Be familiar with the information contained in this Code, Company policies, and applicable laws. Pay particular attention to the policies that pertain to your job responsibilities.
- Promptly report concerns about possible violations of this Code, Company policies, and applicable laws to your supervisor or to the resources listed in this Code.
- Cooperate and tell the truth when responding to an investigation or audit.

Leadership's Additional Responsibilities

If you are a director, officer, supervisor, or manager, you are expected to meet the following 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 this Code, Company 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.



Making the Right Choice—Ethical Decision Making

Many times you are faced with a choice between the right thing and the wrong thing. In those instances, you should always choose the right thing. There will be times when you are choosing between multiple options where several choices may appear to be the "right" choice. Those situations are called ethical dilemmas.

If you're faced with an ethical dilemma and you're not sure what to do, ask these questions about those options before you act:

- Is this aligned with all of our Values?
- Does this comply with all Company policies?
- Is this consistent with our Company's long-term goals and interests?
- Would I be proud of this action were it made public?

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 direction before acting.

Closing the Loop

Our Ethics & Compliance Program must continually evolve to stay current with new and emerging risks and regulations. 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, or the Legal or Human Resources departments. Your suggestions will help us to continuously improve our Ethics & Compliance Program.

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 more familiar with the laws, regulations, and policies that relate to your work.
- If you are not comfortable talking with your supervisor, talk to your supervisor's manager or you can contact the Legal or Human Resources departments.
- If you report an issue to management or to a representative from the Legal or Human Resources Departments, you can request that your report remain confidential. In doing so, you are requesting that your identity 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 contact the Compliance Hotline. All reports are confidential, and you may remain anonymous where allowed by local law.

Using The Compliance Hotline

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 this Code, Company 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.

The Compliance Hotline is multilingual, toll-free, and available 24 hours a day, seven days a week. It can be reached *via* telephone (Canada and United States) or internet (Brazil, Canada, Chile, Peru, The Bahamas, and United States).

Report by Telephone:

Canada and United States

1-866-215-5366

Calls are answered by an outside service, and your caller identification 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 the Legal department for analysis, investigation, and for a response. When you call the Hotline, you receive a tracking number and may call back for an update on your report or to answer a question posed by the investigator.

Report Online:

Hotline reports can be made online at:

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

https://splchileperu.ethicspoint.com
(Chile and Perú)

https://mortonsalt.ethicspoint.com
(The Bahamas and United States)

https://windsorsalt.ethicspoint.com
(Canada)

This method functions the same as calling the Hotline number. Reports can remain anonymous if you choose and you will receive a tracking number to receive 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 makes a good faith report of an alleged violation of this Code, Company policies, or the law.

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 the Legal or Human Resources departments, or any of the resources listed in this Code.



Protecting Our Workplaces

Looking Out for One Another's Safety and Security

Nothing is more important to us 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 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 facilities and corporate offices.

Teamwork Through Inclusion, 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, gender expression, genetic information, citizenship, or any other characteristic protected by law.

ALWAYS KEEP IN MIND:

- Treat others with respect. Treat your co-workers as well as you would want others to treat your parents, spouse, or children at work because they are someone's parent, spouse, or child.
- 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 bullying, abuse, or harassment. This includes actions that are unwelcome, offensive, intimidating, or discriminatory as well as any form of sexual harassment.

Harassment means any inappropriate conduct, comment, display, action, or gesture by one person to another that is made on the basis of race, gender, gender identity, sexual orientation, physical appearance, or a number of other protected grounds.

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

- Gender-based insults or sexist remarks.
- Derogatory jokes, comments, or teasing.
- Insults, taunting, or slurs.
- Display or circulation of derogatory materials such as pictures or literature that an individual may find demeaning.

Harassment also includes sexual harassment, which includes offensive or humiliating behavior that is related to a person's gender, as well as any conduct, comment, gesture, or contact of a sexual nature that is likely to cause offense or humiliation to any person or that might, on reasonable grounds, be perceived by that person as placing a condition of a sexual nature on employment or on any opportunity for training or promotion.

Behavior that may be considered sexual harassment includes, but is not limited to:

- Unwelcome physical contact such as touching, hugging, blocking movements, patting or brushing against a person's body.
- Verbal or written statements, questions, discussion, or jokes that are sexually explicit.
- Questions, remarks, discussions, or jokes of a sexual nature about a person's clothing, body, or sexual activity.
- Displaying or using electronic communication 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 sexually oriented request.
- Indecent exposure or sexual assault.

Harassing behavior is not limited to working 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 functions, and work-related assignments or conferences.

ALWAYS KEEP IN MIND:

- Do not stand by and watch or encourage harassment. Immediately 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, Company policies, and the law any time that you are at work or representing the Company in any capacity.



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, disclosed, used, and retained 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. This includes locking file cabinets, password protecting sensitive electronic documents, and locking your computer screen when you leave your workstation.
- Use care when you provide 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 for us, make sure they understand the importance we place on privacy and that they must uphold our standards.

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.



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, logos, trademarks, 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 any applicable policies.
- 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 violate any Company policies.



Crisis Management

Each and every day, we face situations and issues that may become a crisis. We want to be prepared, be alert, and be safe. The Company has established clear and accessible crisis management protocols to ensure that we manage any crisis in a well-coordinated manner.

ALWAYS KEEP IN MIND:

- Nothing is more important than health and safety. Be sure that you are physically safe before doing anything else.
- Review crisis plans regularly so you are ready to act when the time comes.
- Be factual in your communications. State what you see, touch, hear, or smell.
- Avoid making conclusions until after all facts are known and evaluated.
- If you are unaware of the protocols to follow in the event of a crisis, contact the Legal department immediately.

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 Legal department for additional guidance if you are contacted by a government official conducting any kind of investigation.

Accountability 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.

Winning The Right Way

Preserving Product Quality

We are committed to producing high quality products across all of our brands. We care deeply about product quality and make sure our products meet or exceed our own internal standards, as well as the standards set by laws, regulations, and our industry. We are also committed to developing new products in an ethical and responsible manner, and to following applicable ethical standards and guidelines relating to research. If you are involved in any aspect of developing, handling, packaging, or storing our products, you are expected to:

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

If you see something that could negatively affect the quality of our products, report it immediately to the Quality, Legal, or Human Resources departments.



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, vendor 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 or the Legal or Human Resources departments. Depending on the circumstances, some conflicts may be resolved if they are handled properly.

Exchanging Gifts and Entertainment

We do not offer or accept gifts, entertainment, or other benefits 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, entertainment, or other benefits of nominal value may be offered or accepted.

Nominal Value:

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

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

- Gifts, entertainment, or other benefits are only to be offered or accepted if:
  - The benefit 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:
  - Offering or accepting any gift of cash or a cash equivalent (gift cards, gift certificates).
  - Offering or accepting any gift, entertainment, or other benefit that could reflect negatively on the Company's reputation or your reputation.
  - Any gift, entertainment, or other benefit that violates the policies of the recipient's organization.

Gifts, entertainment, or other benefits that are valued at over the nominal value set for your company are permitted in exceptional cases and must only be offered or accepted after you have received approval from your direct manager. If a manager is unsure whether to grant approval, he or she should email compliance@mortonsalt.com or review the request with any member of the Legal Department. Please allow at least two business days for a response.

Extra care needs to be taken when dealing with government officials

- A government official may include the following: an employee of a state or government owned business, school, hospital, or other entity; any political party or official thereof; a public international organization or any department or agency thereof; and, in Canada, Chiefs and Counsel of First Nations.
- No gifts, entertainment, or other benefits may be offered to government officials without the written approval of the Legal department. A gift includes nominal items such as lunch or company-branded items. To receive approval, please email compliance@mortonsalt.com.
- Any request made to an employee by a government official for an improper payment must be reported immediately to the Legal department or to the Compliance Hotline. 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.

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

Third Party Management

If you manage third party relationships, ensure that they understand their ethics and compliance obligations. Misconduct by business partners, such as suppliers, consultants, sales representatives, and customers, may lead to significant liability and reputation risks for the Company. Each department responsible for the relationship with a business partner is required to report to the Legal department any conduct that is not compliant with law or our policies and regulations. You must also obtain prior written approval from the Legal department before entering into any arrangement with a third party who will have contact with a Government Official on behalf of the Company.

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



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 good 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 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 Legal department.
- Keep your records organized so they can be located and retrieved when needed.

For more information, please review the Company Records Retention Policy.

Retention Holds

Company records should only be destroyed in accordance with the applicable Company policy and never in response to or in anticipation of an investigation, audit, claim, lawsuit, or arbitration proceeding. There are times when we are required to retain certain corporate records while an investigation, audit, or legal claim is pending. To comply with these requirements, we must be sure that any records we destroy are not covered by any retention hold.

Contact the Legal department if there is any doubt about whether or not a record can be destroyed.

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, ethics and compliance. We also expect all suppliers to comply with the Company's Supplier Code of Conduct.

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

ALWAYS KEEP IN MIND:

- 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.
- When we hire former employees of competitors, we respect their obligations not to use or disclose the confidential information of their former employers.
- Protect the confidential and proprietary information of business partners.
- 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 departments.



Uncompromising Integrity

We operate with integrity and 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.

Key Definitions

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

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

Facilitation payments – payments to a government official that are intended to encourage the official to perform his or her responsibilities.

Anti-Bribery and Anti-Corruption

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 offer or accept bribes or kickbacks; offer facilitation or 'grease' payments; or offer or accept any other kind of improper benefit.
- Keep accurate books and records so that payments are honestly described and Company funds are not used for unlawful purposes.
- Obtain written pre-approval from the General Counsel before giving anything of value to a government official.

For more information, see the Company's 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.

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.

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 prohibiting practices that interfere with competition. 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 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 Legal department. Also ensure that your opposition to an inappropriate discussion is noted in the meeting minutes, if any.

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

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 immediately:

- 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.

Insider Trading

In the course of business, you may become aware of material non-public information about 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.

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.

Being Clear and Candid in Our Public Communications

We need a clear, consistent, and truthful 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 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 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.

Improving Our World

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 Legal department before responding.

Respecting Human Rights

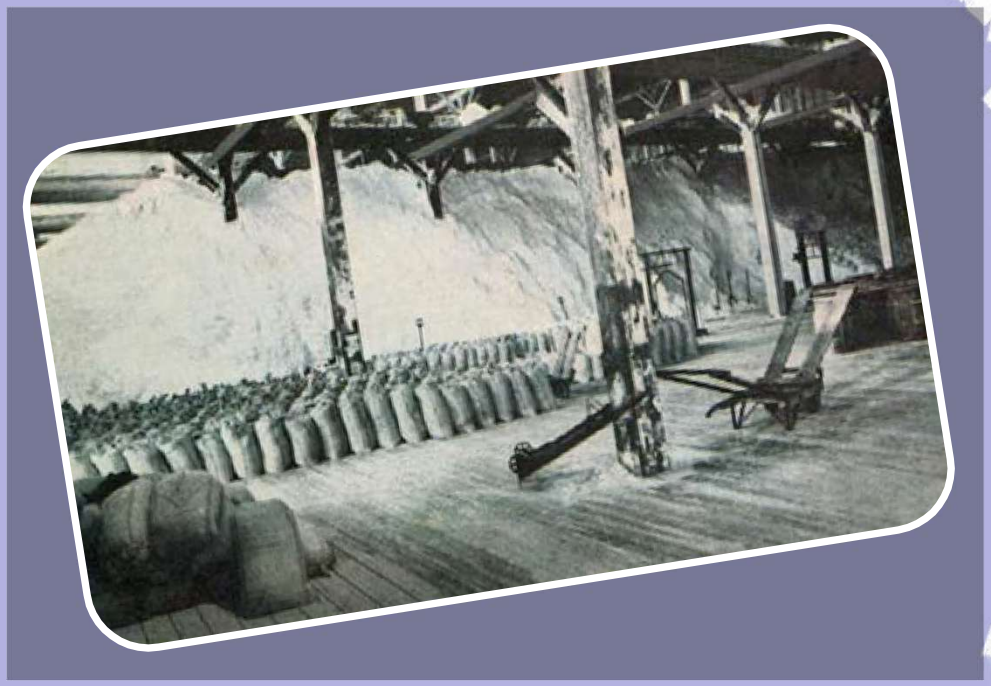
We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights. We will not tolerate abuse of human rights in our operations or in our supply chain.

We act consistent with the United Nations Global Compact. We also take note of global standards such as the Universal Declaration of Human Rights, the International Labour Organization (ILO) Core Labor Standards, the Organization of Economic Co-operation Development (OECD) Guidelines for multinational organization, along with all applicable local law and regulations along with local custom in setting Company standards in the various jurisdictions.

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 business partners.



Protecting the Environment

Sustainability is an integral component of our business strategy. We are committed to minimizing damage 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 stewards of natural resources and to reducing our carbon footprint.

ALWAYS KEEP IN MIND:

- Do your part to ensure that protecting the environment is a priority. Contact your supervisor 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 our Environmental, Health & Safety personnel or our Legal department.
- Be proactive and look for ways that we can reduce waste and use energy and natural resources more efficiently.

Administration of this Code

We also expect anyone acting on our behalf to 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 or the Legal or Human Resources departments.

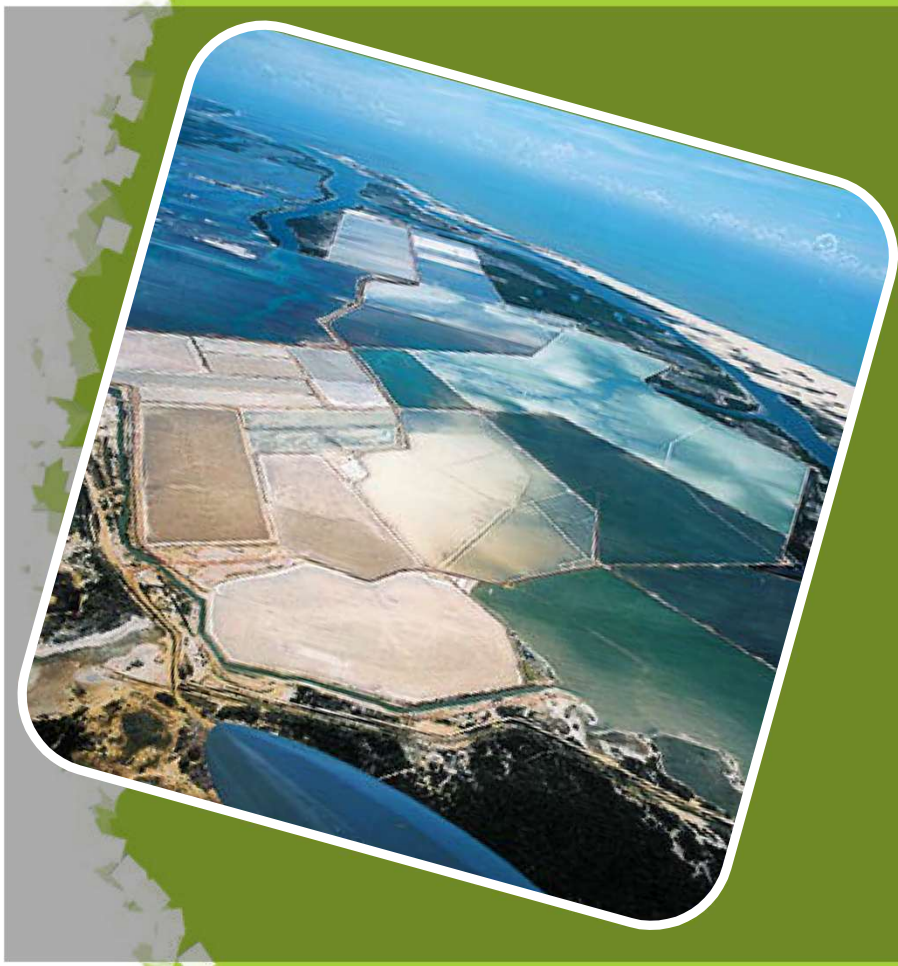
Use and Administration of this Code

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 to serve as a first source of information. If you need additional information and guidance, you may contact your supervisor or the Legal or Human Resources departments.

Once a year, each 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 unreported 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.

Waivers and Exceptions

Only the General Counsel has the authority to grant a waiver or exception from any requirement in this Code. No other supervisor or manager has that authority. Any material amendment or waiver of any provision of this Code must be approved in writing by the General Counsel and promptly disclosed in accordance with the requirements of applicable laws and regulations.



OUR VALUES

INTEGRITY





EMPOWERMENT

EXCELLENCE





TEAMWORK



AGILITY

Contact Us

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

Compliance Hotline:

https://mortonsalt.ethicspoint.com (Bahamas, United States)
https://sdb.ethicspoint.com (Brazil)
https://splchileperu.ethicspoint.com (Chile, Perú)
https://windsorsalt.ethicspoint.com (Canada)

E-mail:

compliance@mortonsalt.com

Mail:

The Morton Salt Group
Attn: Legal Department
9401 Indian Creek Parkway, Suite 1500
Overland Park, Kansas 66210
United States of America

Telephone:

+1 913 391-SALT (7258) (Bahamas, Canada, United States)
+56 2 469-6221 (Brazil, Chile, Perú)
Ask for the Legal Department

March 2026