

# **Human Rights Policy**

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## **Human Rights Policy**

## **Purpose**

CF Industries is committed to the protection and advancement of human rights in its global operations, and the concepts in this Human Rights Policy are generally derived from CF Industries policies and practices already in place. While parts of this policy reflect our review of working standards and human rights concepts advanced by other groups, such as the United Nations' International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, this policy represents CF Industries' statement of its own standards on these subjects, rather than those of a third party. Through adherence to this policy and our <u>Code of Corporate Conduct</u>, we strive to prevent human rights abuses in our operations and businesses.

## **General Principles**

We are committed to fostering a workplace that supports honesty, integrity, respect, and trust.

Employees in all regions and locations shall conduct business consistent with the principles outlined in this policy and our Code of Corporate Conduct. In so doing, they agree to preserve CF Industries' commitment to ethical business and integrity at all times.

CF Industries is an increasingly global company with operations in several jurisdictions around the world, including the United States, Canada and Europe, so circumstances can arise where legal, regulatory or other requirements may necessitate applying or interpreting this policy in ways that assure compliance with applicable local law. In any event, however, we believe that the concepts in this policy represent important fundamental values.

## **Environmental, Health, Safety, and Security (EHS)**

Safety, security and environmental stewardship are top priorities at CF Industries. In accordance with our <u>Environmental</u>, <u>Health</u>, <u>Safety</u>, <u>and Security policy</u>, we are advancing a culture of EHS excellence where everyone is engaged, empowered and innovative in cultivating a workplace that promotes the safety and health of our employees, contractors, customers, business, communities where we operate, and the environment.

We design and operate our facilities in a manner that protects the environment and the health, safety, and security of our employees, contractors and the public. Processes and procedures are in place to ensure the timely communication of any EHS risks, threats or security concerns to impacted employees and community agencies and to deal appropriately with issues that may arise.

#### **Non-Discrimination**

We work together to make sure our workplace is a respectful, inclusive, diverse, and productive one. This means that our organization will never unlawfully discriminate against any person on any basis in our operations. This means, in part, that we never make unlawful employment-related decisions based on any legally protected status or characteristic, including but not limited to race, sex, color, religion, national origin, ethnicity, age, medical condition, military or veteran status, disability, pregnancy, maternity or parental status, marital or civil partnership status, sexual orientation, or gender identity, as and where protected by applicable law.

This policy applies to all employment decisions, including recruiting, hiring, training, promotion, compensation, benefits, transfers, training practices, as well as participation in Company programs.

#### Harassment

CF Industries is committed to maintaining a productive working atmosphere. We do this not only because applicable law requires it, but also because a tolerant, collaborative company is more competitive in the marketplace. We strive to create an environment where everyone is able to live up to his or her potential. Accordingly, we will not tolerate any form of harassment. Harassment may be any verbal or physical conduct by any individual that disrupts, offends, or interferes with another's work performance, or that creates an intimidating, offensive, or hostile work environment. Review our global <a href="Anti-Harassment policy">Anti-Harassment policy</a> for further information.

#### **Freedom of Association**

We recognize and respect employee rights to join or not join any lawful organization of their own choosing. We are committed to complying with laws pertaining to freedom of association, privacy and collective bargaining.

#### **Work Environment and Compensation**

We are committed to promoting a work environment that fosters communication, productivity, creativity, teamwork, and employee engagement. We seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location (local market) where the work is being performed, and competitive with other world-class companies. Our compensation and benefits comply with applicable laws. CF Industries has established competitive pay levels that are based on job descriptions and independent of gender, age, ethnicity, or other personal characteristics or beliefs.

### **Hours of Work and Work Scheduling**

Each CF Industries location establishes work shifts and schedules as appropriate to meet business needs and to comply with applicable laws and collective bargaining agreements.

## Slavery, Human Trafficking, Forced Labor and Child Labor

CF Industries believes that the employment relationship should be voluntary, and the terms of employment must comply with applicable laws and regulations. We are therefore intolerant of slavery, human trafficking, forced labor and child labor and are committed to complying with applicable laws prohibiting such exploitation.

## **Anti-corruption**

As a multi-national company, we are subject to international laws that prohibit bribery and corruption, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. We comply with these laws and take pride in competing based on the value we bring to our customers—never by paying or accepting a bribe or seeking to obtain or retain an improper advantage in any way. Employees are expected to adhere to existing policies for anti-corruption, global competition, and ethical business conduct. Employees are trained on anti-corruptions topics and are encouraged to report any suspicions of wrong doing via the company's Compliance Helpline.

## **Expectations for our Suppliers**

CF Industries strives to conduct business with suppliers, business partners, contractors, vendors, agents, consultants and other third parties (collectively, "Third Parties") who share our commitments to conducting business in full compliance with the letter and spirit of all applicable laws, rules and regulations, in accordance with the highest ethical standards, and in a manner that keeps our employees and communities safe. CF Industries expects all Third Parties and their respective employees, agents and subcontractors to follow the principles summarized in our Third Party Code of Conduct in the conduct of their business.

## **Implementation**

This Human Rights Policy has been communicated and is accessible to all employees.

Employees should report any suspected violation of this policy or the principles set forth herein through established channels. To make a report or ask questions if you need help or guidance, you can contact:

- Your supervisor, manager, or another manager
- Human Resources
- Legal Department
- A Compliance Officer or
- the Compliance Helpline— 888-711-3620 in the U.S. or Canada; 0808-234-9998 in the UK; or online via <a href="https://www.cfindustries.ethicspoint.com">www.cfindustries.ethicspoint.com</a>

Our Compliance Helpline is managed by an outside party and is available 24 hours a day, 7 days a week.

CF Industries will not tolerate retaliation against any person for reporting a possible violation or participating in an investigation of possible misconduct in good faith.

#### **Administration**

The Senior Vice President, Human Resources, has overall responsibility for the administration of this policy, with support from Legal, Compliance, EHS and other functions as needed.

Human Resources and Supervisors/Managers at all levels are responsible for upholding this policy and fully supporting the company's efforts to create a respectful, fair, and safe work environment; to model their behavior accordingly; and to report non-compliance with this policy.

Employees are responsible for treating co-workers with respect, valuing different thinking and ideas, working effectively across differences, and reporting any violations of the principles presented herein.