

# Modern Slavery Report

For the financial year ended December 31, 2023

At CF Industries, Inc. and its subsidiaries (collectively, “CF Industries”), we have a long history of doing the right thing for our company, our customers, our suppliers, our communities, and our employees. Doing the right thing is the cornerstone of our culture and is a significant factor in our success. Our ethics and governance practices are designed to ensure that our Do It Right philosophy is reflected in the actions of our people across all aspects of our business. These practices have established a culture of trust, safety, and accountability for our company, our shareholders, our customers, our suppliers, our communities and our employees.

We are committed to acting ethically and with integrity in all of our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business. This includes a commitment to the protection and advancement of human rights in our global operations. We strive to work ever more closely with our suppliers to ensure their workforce, and the workforce of their supply chains are treated with respect and dignity. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products and services responsibly.

This report (this “Report”) under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9), is made for CF Industries, Inc. and its subsidiaries Terra International (Canada) Inc., Canadian Fertilizers Limited and CF Industries Sales, LLC (together, the “Reporting Entities”) for the financial year ending December 31, 2023 (the “Reporting Period”). We recognize that stamping out modern slavery and modern slavery risks is a process that will take time. Our Report outlines the measures we have in place and the actions we have taken to assess and address risks of modern slavery, including forced labor and child labor, in our business and supply chain.

## 1 Our structure and business operations

CF Industries is the world’s leading ammonia manufacturer, employing approximately 2,700 people. With nine manufacturing facilities in North America and the U.K., and headquarters in Northbrook, Illinois, we produce hydrogen, ammonia, and derivative nitrogen fertilizer and other nitrogen products for energy, fertilizer, emissions abatement and other industrial activities. Our assets include two Canadian nitrogen manufacturing facilities, located in Medicine Hat, Alberta and Courtright, Ontario and three distribution facilities located in Canada.

Terra International (Canada) Inc. owns our Courtright, Ontario manufacturing facility that produces ammonia, urea ammonium nitrate (UAN) and diesel exhaust fluid (DEF). Canadian Fertilizers Limited owns our Medicine Hat, Alberta manufacturing facility that produces ammonia and granular urea. CF Industries Sales, LLC is the CF Industries group entity that sells our products to third party customers in Canada and the U.S. CF Industries Sales, LLC and Terra International (Canada) Inc. export nitrogen products produced at our Canadian manufacturing facilities to the U.S. for sale to customers in the U.S. From time to time, CF Industries Sales, LLC imports nitrogen products produced at CF Industries’ U.S. locations to Canada for sale to customers in Canada.

To learn more about our business, please visit our website at [www.cfindustries.com](http://www.cfindustries.com).

## 2 Our supply chain

CF Industries’ supply chain includes local, regional and global partners from whom we purchase products and services including natural gas, transportation, third party distribution, utilities, and other requirements for our manufacturing sites, distribution facilities and corporate offices. The Procurement and Material Control organization within CF Industries manages spend exclusive of

natural gas, third party distribution and transportation. This spend is conducted with more than 5,000 suppliers across a number of areas, including but not limited to: capital equipment, maintenance services, chemicals, catalyst, spare parts, utilities, professional services, information technology, travel, engineering services and environmental services.

The vast majority of the supply base is located in North America and Western Europe. The extended supply chain is exponentially greater than the number of suppliers CF Industries utilizes. The spend varies from year-to-year but generally is in the range of more than \$1 billion per year. In addition, the Procurement and Material Control team manages warehouses and the corresponding inventory of spare parts to support manufacturing operations.

CF Industries' primary raw material, natural gas, is delivered to its nine production locations by pipeline. North American operations have a dedicated natural gas management organization that procures natural gas for delivery to the plants, manages price risk through physical contracts and financial derivatives, and manages natural gas transportation contracts to deliver gas from nearby hubs to the plants. In total, gas is procured from approximately 25 counterparties, all of whom are either natural gas production and exploration companies or major natural gas marketing companies, using a mix of term contracts and monthly spot purchases. New suppliers are added from time to time, but the supply base tends to change slowly. The cost of natural gas procured varies with fertilizer production and the market price of gas and has averaged about \$1 billion per year in recent years.

Our transportation organization manages outbound freight services, leasing of transportation equipment and terminal operations, and related services, for which the company spends approximately \$500 million per year. Products are shipped from CF Industries' plants, terminals and leased facilities by river barge, rail, truck, ocean-going vessel and pipeline. In some cases, our customers arrange truck or marine transportation from our facilities to their own.

### **3 Our commitment to ethical behavior and compliance with law**

Our Code of Corporate Conduct serves as the foundation of our commitment to ethical behavior. The Code is applicable to all of our directors, officers and employees. It reaffirms CF Industries' long-standing practice of conducting its business in full compliance with the letter and spirit of all applicable laws, rules, and regulations and in accordance with the highest level of ethical standards. With our U.S. headquarters and operations in three countries with well-developed legal systems, CF Industries' commitment to compliance with local and federal regulations includes all relevant labor, environmental, corporate and related laws.

CF Industries is committed to the protection and advancement of human rights in our global operations and has adopted a Human Rights Policy. Our Human Rights Policy reaffirms our intolerance of slavery, human trafficking, forced labor and child labor and our commitment to compliance with applicable laws prohibiting such exploitation. Through adherence to this policy and our Code of Corporate Conduct we strive to prevent human rights abuses in our operations and businesses.

CF Industries strives to conduct business with suppliers, business partners, contractors, vendors, agents, consultants and other third parties (collectively, "Third Parties") who have similar values and share our commitment to ethical standards for business practices, including those related to human rights. 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. Our Third Party Code of Conduct expressly communicates CF Industries' expectation that Third Parties (a) prohibit the use of any form of forced or involuntary labor, (b) observe fair labor practices, and (c) have controls in place to ensure compliance with applicable labor law and regulations, including those related to child labor, fair wages, and working hours.

Safety, security and environmental stewardship are top priorities at CF Industries. Our Environmental Health, Safety and Security Policy (the "EH&S Policy") details how we make sure we are focused on safety at work. In accordance with our EH&S Policy, we are advancing a culture of environmental, health and safety ("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.

In addition to our Code of Corporate Conduct, Human Rights Policy, Third Party Code of Conduct and EH&S Policy, our corporate policies governing ethics, safety, and working conditions also include our Anti-Corruption Compliance Policy and our Anti-Harassment Policy, among others.

All policies named above are made available to our employees, and are externally available on our website at [www.cfindustries.com](http://www.cfindustries.com).

Any suspected violation of our Human Rights Policy or the principles set forth therein, our Code of Corporate Conduct or our Third Party Code of Conduct, or any other suspected misconduct, may be reported to our anonymous compliance helpline managed by an outside company and available 24/7.

## **4 Due diligence processes**

We are constantly in the process of reviewing and improving our approach to supplier due diligence. Our supply chain management and procurement teams have a robust strategy to pressure test and manage our suppliers, including performing risk assessments, executing mitigation plans, and engaging with a cross-functional business continuity committee.

We employ a screening process for new and existing suppliers. Supplier screening incorporates regulatory compliance and ethical business conduct. Our Vice President of Procurement leads the vetting process alongside our legal department and Chief Compliance Officer.

Suppliers are expected to comply with our EHS expectations and Third Party Code of Conduct, an established requirement set forth in our purchase agreements.

Along with ongoing supplier engagement, we utilize EcoVadis, IS Net World and World Check to assist our screening process. If an issue is raised during the screening process, we initiate a review process to determine the level of importance. If a concern is deemed problematic, we engage the supplier to develop improvement plans to get them to meet CF Industries' expectations, while ensuring their on-site performances meets our requirements. If necessary, we will block non-compliant suppliers in our vendor system.

Our key suppliers are administered an annual questionnaire by EcoVadis. This third-party platform administers an industry-specific questionnaire and performs an assessment of a company's management and performance across environmental, labor and human rights, ethics, and sustainable procurement. We implemented EcoVadis in 2021. At the end of year three of the program, over half (52%) of the company's total procurement and supply chain expenditures are accounted for in the survey, with 132 suppliers under active assessment and average scores improving year on year. In 2023, CF Industries was awarded a silver medal by EcoVadis, which places us among the top 25 percent of companies assessed by EcoVadis.

## **5 Our modern slavery risk profile**

CF Industries does not have any operations that are identified as at significant risk for incidents of child labor or forced or compulsory labor practices. CF Industries abides by all applicable child labor laws, as well as our hiring and employment policies. We expect all our business partners and those who we conduct business with to comply with labor and employment laws, including those that relate to child labor and forced labor.

CF Industries generally does not have any suppliers in regions that are identified as at significant risk for incidents of child labor or forced or compulsory labor practices. As provided in our policies, including our Third Party Code of Conduct, and our contractual commitments, suppliers are expected to be in full compliance with all applicable laws, rules and regulations that govern the jurisdictions in which they do business. Where our suppliers have a supply chain that may extend into areas that

are of higher risk or where risks are identified, mitigation plans will be put in place, such as additional assurances or supplier visits and audits.

## **6 Supplier adherence to our values**

CF Industries seeks to do business with suppliers 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 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.

As set forth in our Third Party Code of Conduct, we expect Third Parties to observe fair labor practices and have controls in place that ensure compliance with applicable labor laws and regulations, including those related to child labor, fair wages, and working hours. We also expect Third Parties to prohibit the use of any form of forced or involuntary labor.

CF Industries incorporates the Third Party Code of Conduct as a matter of course in all business agreements. Third Parties are responsible for understanding and adhering to CF Industries' expectations and should implement appropriate controls to ensure adherence to our Third Party Code of Conduct. We may terminate our business relationship with a Third Party that acts in a manner inconsistent with the Third Party Code of Conduct.

## **7 Remediation measures**

We have not identified any instances of modern slavery or human trafficking in our business and supply chains, therefore, no remediation measures have been necessary.

## **8 Remediation measures relating to loss of income to vulnerable persons**

We recognize that any remediation measures potentially have the unintended consequence of inflicting loss of income on vulnerable persons, such as migrant labourers, unskilled labourers, women, and children. As we have not discovered any instances of modern slavery in our business and supply chain, we have not had to take any remediation measures over the course of the reporting period that would have led to loss of income to the most vulnerable families.

## **9 Training and Awareness**

Our ethics, governance and safety practices are designed to ensure that our Do It Right philosophy is reflected in the actions of our people across all aspects of our business. Our Code of Corporate Conduct applies to all directors, officers and employees, all of whom participate in our code of conduct and anti-corruption training annually. In addition, all employees receive annual training on our EHS Policy and CF Industries' anti-harassment and discrimination policies.

We review our business operations and consider additional training and communications as needed to reflect best practices and current developments.

## **10 Assessing Effectiveness**

CF Industries has established goals and tracks performance annually to assess the effectiveness of our actions. For the Reporting Period, our ethics and governance goals include:

- (a) engage suppliers and service providers that annually represent 50% of the company's total procurement and supply chain expenditures and assess their ESG performance and commitment,

- (b) train and certify compliance with the EH&S Policy for all employees annually,
- (c) train on inclusion, diversity and equity matters for all employees annually,
- (d) train and certify compliance with the Code of Corporate Conduct for all employees annually, and
- (e) train and certify compliance with the anti-corruption compliance policy for all employees annually.

The last four goals were fully achieved for the Reporting Period, while the first goal is still in progress.


## 11 Approval of this Report

This Report is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes the Reporting Entities' joint modern slavery report for the financial year commencing on January 1, 2023 and ending on December 31, 2023.

This report was approved by the Board of Directors of CF Industries, Inc. pursuant to subparagraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 28, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the Reporting Entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed

By:   
Michael P. McGrane  
Vice President, General Counsel and Secretary  
CF Industries, Inc.  
Date: May 28, 2024

I have the authority to bind CF Industries, Inc.