**EHS and Security Variance Program**

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**Table of Contents**

[**1.** **PURPOSE** 2](#_Toc188965955)

[**2.** **SCOPE** 2](#_Toc188965956)

[**3.** **APPENDICES** 2](#_Toc188965957)

[**4.** **DEFINITIONS AND INTERPRETATION** 2](#_Toc188965958)

[**5.** **ROLES AND RESPONSIBILITIES** 2](#_Toc188965959)

[**6.** **GENERAL REQUIREMENTS** 3](#_Toc188965960)

[**7.** **APPROVAL MATRICES** 4](#_Toc188965961)

[**8.** **REFERENCES** 6](#_Toc188965963)

[**9.** **REVISION LOG** 6](#_Toc188965964)

1. **PURPOSE**

This program establishes the process for a facility and/or a Business Unit (BU) to request, route, and obtain approval for a limited variance from an EHS Standard, Program, or other requirements.

1. **SCOPE**

The requirements of this program apply to all Mosaic facilities.

|  |  |
| --- | --- |
| In-Scope | Out-of-Scope |
| * EHS Standards
* EHS Programs (Global and BU)
 | * All legal requirements
* All legal documents
* Site level procedures
 |

1. **APPENDICES**

The following appendices are associated with this Program:

| Appendix | Appendix Title |
| --- | --- |
| A | EHS Variance Request Form |

1. **DEFINITIONS AND INTERPRETATION**

Key terms and acronyms used in this program are defined below.

|  |  |
| --- | --- |
| Term | Definition |
| Variance | A formally authorized deviation from an EHS requirement. |

1. **ROLES AND RESPONSIBILITIES**

The following table contains a listing of responsibilities for specific groups/jobs as required:

|  |  |
| --- | --- |
| Group or Title | Responsibilities |
| Requester (the person initiating the request) | * Ensure that the form is complete
* Route the form as per the appropriate approval matrix, and obtain the required approval signatures (paper or electronic)
* Ensure the variance document has the correct filename format
* Save the completed variance form to the correct Content Server folder location once approval is finalized
* Track expiration of approved variances and manage renewals.
* Use existing applications (ie. SAP, Intelex, Content Server) to track expiration
 |
| Approvers | * Review variance requests for approval
* Route to next level for approval if required
* If final approver, send back to Requester
 |

1. **GENERAL REQUIREMENTS**

6.1 All approved new variances or approved extensions to existing variances are valid for no longer than one (1) year.

6.2 If a facility or BU determines that a specific requirement does not apply or is not feasible to accomplish, the facility or BU shall initiate a request for a variance to that requirement.

6.3 All variance requests shall be submitted via the EHS Variance Request Form (Appendix A).

6.4 All variance requests shall be made to the highest level of the stated requirement.

Example: If a BU Program and an EHS Standard state the same requirement, then the requester shall submit the variance request on the EHS Standard).

6.5 The EHS Variance Request Form must be routed to obtain approvals as per the Approval Matrices in Section 7 and filed centrally in the appropriate EHS Variance folder (see Section 8 - References).

* **Note:** All approved variance forms must be filed using the following naming convention/nomenclature:

Site name or business unit-document involved–expiration date [year-month-day]

(Example: NewWales-ContractorFP-2013-12-15)

6.6 Approved variances and the expiration date shall be communicated to all appropriate groups at the start of the variance. A separate communication shall be communicated to all appropriate groups upon variance expiration.

6.7 When an extension to an existing variance is desired, the BU or facility is responsible to route an EHS Variance Request Form and indicate that the request is an extension to an existing variance by completing the questions specific to the extension request.

6.8 Audit teams should familiarize themselves with current approved variance(s) before an audit commences.

1. **APPROVAL MATRICES**

7.1 Required approvals are indicated numerically within the matrices and must be obtained in the order specified. “N/A” indicates that the level of approval is not required.

7.2 Use this Approval Matrix for **NORTH AMERICA BUSINESS FACILITIES**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Position/Title | EHS Standard | Security Corporate Standard | NAB BU Program | Phos / Potash Program |
| Sr Manager, Health & Safety or Environmental | 1 | N/A | 1 | 1 |
| General Manager – Site | 2 | 1 | 2 | 2 |
| Manager Security Services | N/A | 2 | N/A | N/A |
| Director, Health & Safety or Environmental | 3 | N/A | 3 | 3 |
| VP Operations or Capital | 4 | 3 | 4 | N/A |
| VP EHS  | 5 | N/A | N/A | N/A |
| Director, Security | N/A | 4 | N/A | N/A |

* 1. Use this Approval Matrix for **U.S. DISTRIBUTION FACILITIES**

|  |  |  |  |
| --- | --- | --- | --- |
| Position/Title | EHS Standard | Security Corporate Standard | U.S. Distribution Program |
| General Manager / Superintendent – Site | 1 | 1 | 1 |
| U.S. Distribution EHS | 2 | N/A | 2 |
| Senior Director Warehousing | 3 | 2 | 3 |
| Manager Security Services | N/A | 3 | N/A |
| VP EHS | 4 | N/A | N/A |
| VP Supply Chain | N/A | 4 | N/A |
| Senior VP Supply Chain | N/A | 5 | N/A |

7.4 Use this Approval Matrix for **BRAZIL AND PARAGUAY BUSINESS FACILITIES**

|  |  |  |  |
| --- | --- | --- | --- |
| Position/Title | EHS Standard  | Security Corporate Standard | Brazil Program |
| EHS Site Manager | 1 | N/A | 1 |
| Site Security Representative | N/A | 1 | N/A |
| General Manager – Site | 2 | 2 | 2 |
| EHS Director, Operations | 3 |  N/A | 3 |
| Security Manager | N/A | 3 | N/A |
| VP Operations | 4 | 4 | 4 |
| VP COE  | 5 | 5 | 5 |
| VP EHS | 6 | N/A | N/A |
| Corporate Sr. Manager Security | N/A | 6 | N/A |

7.5 Use this Approval Matrix for **MISKI MAYO**

|  |  |  |  |
| --- | --- | --- | --- |
| Position/Title | EHS Standard | Security Corporate Standard | Miski Mayo Program |
| EHS Manager | 1 | N/A | 1 |
| General Manager – Site | 2 | 1 | 2 |
| Manager Security - Site | N/A | 2 | N/A |
| Corporate Sr. Manager Security | N/A | 3 | N/A |
| VP Operations  | 3 | 4 | 3 |
| VP EHS  | 4 | N/A | N/A |
| Senior VP  | N/A | 5 | N/A |

1. **REFERENCES**

| References |
| --- |
| Business Unit – [Variance Request from Business Unit Requirement Records](http://doculink.mosaicco.com/livelink/livelink.exe/open/113019852)  | Content Server folder where completed, approved variances from business unit programs are saved |
| Global and Corporate – [Variance Request from Global and Corporate Requirement Records](http://doculink.mosaicco.com/livelink/livelink.exe/open/16315613) | Content Server folder where completed, approved variances from global standards and programs and former corporate standards are saved |

1. **REVISION LOG**

| Rev. No. | Rev. Date | Revised By | Reason for Revision |
| --- | --- | --- | --- |
| 1-6 | Various prior to Jan 2025 | Former Corporate Team | All previous versions were made under Corporate EHS |
| 00 | 2/14/2025 | PMO | Replaces previous Corporate EHS Variance Standard |