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1. PURPOSE

The Mosaic Management of Change (MOC) Element establishes the minimum requirements for managing changes in process, procedural (document standards, programs and procedures), procurement, people, organization, and legal or other requirements. The MOC Element ensures that proposed changes are reviewed and approved with proper controls in place as needed before the change is implemented.

2. SCOPE

The requirements of the MMS apply to all of Mosaic with limited exceptions of mergers and acquisitions that are not yet operated by Mosaic.

3. ROLES AND RESPONSIBILITIES

3.1 Senior Leadership

3.1.1 Set expectations for the MOC process framework.

3.1.2 Provide adequate resources for sites to effectively manage change.

3.2 Business Unit

3.2.1 Conduct and communicate MOCs for global level and BU level changes that impact the business or site.
3.2.2 Define the MOC requirements and expectations to effectively manage changes at Mosaic.
3.2.3 Formulate the procurement and supply chain MOC requirements and expectations for changes to chemicals and assets.
3.2.4 Oversee compliance to process MOC program.

3.3 Procurement

3.3.1 Ensure that the MOC process is initiated for procurement changes.

3.4 Site

3.4.1 Recognize and initiate the MOC process for all changes within the site.
3.4.2 Communicate MOC changes to the appropriate workers and key stakeholders.
3.4.3 Follow the MOC process for all changes within capital projects.
3.4.4 Track and complete the actions generated from site MOCs.
3.4.5 Assign individuals from the site to assume overall responsibility for managing the site implementation and compliance with this Element as Element Sponsor and Element Owner.
3.4.6 Ensure that the MOC process is initiated for people changes.
3.4.7 Ensure affected personnel are trained in Management of Change requirements.

3.5 Element Sponsor

3.5.1 Champion the implementation, maturity, and improvement of this element at the site level.
3.5.2 Facilitate resolution of identified issues and barriers to effective implementation of MOC processes at the site.

3.6 Element Owner

3.6.1 Establish, communicate, and monitor the implementation of this Element.
3.6.2 Ensure integration of Management of Change process into operations.
3.6.3 Communicate Management of Change performance, resource requirements, and operational impacts.

3.7 MOC Change Coordinator/Owner

3.7.1 Monitor and assess preventive actions associated with the change.
3.7.2 Ensure changes are incorporated into affected Elements and systems.
3.7.3 Monitor the risk and compliance associated with the change.
3.7.4 Communicate MOC changes to the appropriate workers and key stakeholders.

3.8 Workers

3.8.1 Recognize and communicate changes that require the MOC process to be initiated.
3.8.2 Follow established or newly created procedures resulting from a change in the workplace.

4. SITE REQUIREMENTS

4.1 General

4.1.1 Establish and maintain MOC processes for all process, procedural, procurement, people, organizational, legal or other requirements changes.
4.1.2 Involve competent individuals with the necessary expertise and experience to effectively manage and execute MOC processes.
4.1.3 Ensure that MOCs have relevant information, consider all aspects of change, and have competent reviewers to effectively assess and manage change.
4.1.4 The action plans generated from the MOCs must be tracked and monitored to ensure actions are closed on time, if applicable.
4.1.5 Communicate changes to affected personnel to ensure they are aware of new or changed processes or requirements.
4.1.6 Identify and mitigate any new risks associated with the change and ensure the Risk Register is updated.
4.1.7 Ensure no changes are put into place until the MOC process is complete and the approval to proceed has been communicated.
4.1.8 Ensure all MOC records are managed in compliance with established document control standards according to Element 8.
4.1.9 All MOCs opened at the sites must be available for consultation.

4.2 Replacement in Kind

4.2.1 A replacement of an asset that:

a. Conforms to existing design specifications, procedure, and policy, and

b. Is of the same fit, form or function

c. Note: If material of construction is being changed, the activity does not qualify as “Replacement-in-kind”.

4.3 Process Change

4.3.1 A process MOC is required when there is any change that is not a replacement-in-kind that modifies or alters existing assets or conditions.

4.3.2 Process change could be permanent, temporary or emergency.

4.3.3 Process changes include, but are not limited to:

a. Process equipment

b. Process controls and automation

c. Safe operating limits

d. Materials of construction

e. Materials used, their compositions, properties, packaging, and wrapping

f. Design of equipment or structure

g. Process inputs and raw materials

h. Infrastructure

i. Layout or general arrangement

j. Final products

4.3.4 Process MOC shall include, at a minimum, the following steps:

- Description of the change (Scope);
- Evaluation of impact to the process;
- Technical basis, including the intended goal and justification of the change;
- Review and approval of the change;
- Pre-start actions with target completion dates;
- Pre-startup safety review (PSSR);
  Note: PSSR is a systematic and thorough safety evaluation conducted before the startup of a new or modified process
- Authorization for startup with the change by the equipment owner;
- Post start actions with target completion dates

4.4 Temporary Process Changes

4.4.1 Temporary Change Requests follow the same process as a Permanent Change, with an additional step added after the PSSR Activities stage.

4.4.2 Temporary changes and related MOCs can remain in place for up to 6 months.

4.4.3 There is an allowance for a temporary MOC extension, but once that extension time lapses, the MOC must either be returned to the original condition OR permanent MOC created.

4.5 Emergency Process Change

4.5.1 When a change is required in an emergency situation that impacts EHS and the normal MOC review and approval process cannot take place, the following steps shall be taken:

- The Change Coordinator shall complete the MOC request, identifying the reason for the emergency action (i.e., prevent potential injury to personnel, damage to equipment or facilities, adverse environmental or community impact, or severe economic penalty).
- Approval to proceed with the emergency change shall be obtained from the appropriate site area and manager approvers.
- If Emergency Change is not reversed to original condition, Change Coordinator should create a temporary or permanent change request within 3 business days.

4.6 Procedural - Document Standards, Programs and Procedures Change

4.6.1 MOC is required for any new or updated controlled documents, such as standards, programs, and procedures.

4.6.2 Documents requiring a MOC when they are created or updated include, but are not limited to:

- Mosaic Management System;
- Business Unit programs;
- Site procedures.

4.6.3 Standards, programs and procedures MOC shall include, at a minimum, the following requirements:

- Review and approval process through the document control system workflow;
- Adherence to process for document and record destruction; and
- Consult EHS Risk Register and/or EHS LOR as applicable; update as necessary.

4.6.4 Standards, programs and procedures MOC shall meet the requirements of the Document and Records Control Policy.

4.7 Procurement Change

4.7.1 Procurement MOCs are required when there is a change associated with procurement of materials, chemicals, services, or equipment.

4.7.2 Processes governing Procurement MOC shall include, at a minimum, the following requirements:

- Approval and review process for obtaining equipment, specifications, materials of construction, raw materials and chemicals that are not replacement-in-kind;
- Identification of any additional inspections required upon receipt of critical equipment that is used to control risk; and
- Consultation of the EHS Risk Register and/or EHS LOR as applicable and updated as necessary.

4.8 People Change

4.8.1 People MOC is required when there is a change in worker assignments.
4.8.2 Examples of events triggering MOC of people include, but are not limited to:

- New worker;
- Transfer from one role to another;
- Transfer from one department or site to another department or site;

4.8.3 Processes governing People MOC shall include, at a minimum, the following requirements:

- Review of key MMS roles and responsibilities;
- Review of required training, including of the identification of short-term needs or activities to meet training and competency requirements;
- Key external and internal relationships;
- Review top area or site risks; and
- Review EHS LOR as applicable.

4.9 Organizational Change

4.9.1 Organizational MOC is required when there is a change in the organization structure or assigned responsibilities.
4.9.2 Organizational Changes include, but are not limited to:

- Addition of a new role,
- Elimination of an existing role, and
- Restructuring of key roles and responsibilities.
- Interim assignment of responsibilities.

4.9.3 Processes governing organizational MOC shall include, at a minimum, the following requirements:

- Prior to an organizational change, the key roles and responsibilities of all impacted employees/departments shall be discussed and planned;
- Develop a plan to communicate the Organization Change to all impacted employees/departments;
- Analyze the gaps between the old organization and the design of the new one; and
- Consult Roles and Responsibilities, EHS Risk Register and/or EHSS LOR as applicable and update as necessary.

4.10 Legal MOC

4.10.1 Ensure that legal MOC's are conducted when changes occur to the Legal and Other Requirements (LOR) due to:

a. External regulatory changes in laws;

b. Regulations or permits, and

c. Updates to the LOR due to site changes that now require adopting new regulatory requirements

4.10.2 Legal MOCs should include, at a minimum:

a. Identification, tracking, and evaluation of EHS LOR;

b. Update EHS LOR Register, if applicable

5. TRAINING

All employees will receive MOC training as appropriate to their duties/tasks to ensure competency. Refresher training will be provided in the event MOC processes are modified.

Process MOCs shall facilitate and ensure the identification and completion of all required training associated with the change, including:

- Regulatory and other compliance training, as applicable;
- Training on equipment usage or operating procedures; and
- Training associated with any new hazards or risks present as a result of the change.

Training requirements and documentation of completion for process MOCs shall be included in the MOC and retained as records, as applicable.

6. REVIEW

The Management of Change Element will be reviewed at least every three years by EHS Services and updated as needed. Appropriate communication will occur, as needed, to ensure all employees and contractors are aware of the changes.

7. REFERENCES

- Element 4 – Legal and Other Requirements
- Element 8 – Document and Record Control
- CCPS – Guidelines for Risk Based Process Safety
- Process Management of Change (MOC) Program
    - Note: Process Management of Change (MOC) Program identifies requirements and instructions for process changes.

8. DOCUMENT CONTROL

All MMS documents will be controlled in the Mosaic document management system. Any printed documents must be date stamped with the date printed to monitor that the most current version is reviewed.

All documents and records must be retained per the requirements of Element 8 - Document Control and local retention schedules

9. REVISION HISTORY

Revision Date	Revision Number	Description of Change
04/01/2024	**1**	**4.4.1 Removed EHS approval for emergency MOC – SAP is not designed to do it**
April 1, 2024	1.0	3. Roles and Responsibilities section - removed "Human Resources" 3. Roles and Responsibilities section – added "Ensure that the MOC process is initiated for organizational changes" to Business Unit Roles and Responsibilities 3. Roles and Responsibilities section – added "Ensure that the MOC process is initiated for people changes" to Site Roles and Responsibilities 3. Roles and Responsibilities section – changed "Management of Change Coordinator" to "Management of Change Lead" in Element Sponsor and Element Owner Roles and Responsibilities 3. Roles and Responsibilities section – changed section "Management of Change Coordinator" to "Management of Change Lead" 4.1.2. Changed "MOC Coordinator" to "MOC Lead" 4.4 – Included Emergency "Process" Change 4.4.1. Changed "…in an emergency situation and the normal MOC…" to "in an emergency situation that impacts EHS and the normal MOC…" 4.4.1. Added "- does not include process changes" to "The Originator shall complete the MOC request, identifying the reason for the emergency action (i.e., prevent potential injury to personnel, damage to equipment or facilities, adverse environmental or community impact, or severe economic penalty – does not include process changes" 4.4.1. The emergency MOC needs to be formally approved by site leader or designee (Ex: written approval, EHS online platform, etc).

		4.4.1. Review that Official MOC review must be initiated instead of performed and the new deadline to initiate is 3 business days instead of within 24 hours. 4.5.3. Removed “Signed documentation to train and inform workers of the change” 4.6.1. Removed “Requiring Procurement MOC include, but are not limited to: Equipment replacement, materials of construction, inventory amount/location or specifications ordered; Addition or substitution of a raw material or chemical; and Contractor or service provider selection.” 6. Review changed from “yearly” to “at least every three years”
April 1, 2025	2.0	Major rewrite of program (alignment of new SAP process) 3.1.1 Change “Set expectations for worker and organizational MOC to effectively manage all organizational changes” to “Set expectations for the MOC process framework”. 3.1.2 Change “Support the MOC process as being required for all changes within the company” to “Provide adequate resources for sites to effectively manage change”. 3.2 Remove EHS Services Roles and Responsibilities. 3.3.2. Move “Provide adequate resources for sites to effectively manage change” to Senior Leadership responsibilities. EHS services responsibilities section combined with Business Unit and entire section rewritten. 3.4.7 Add “Ensure affected personnel are trained in Management of Change requirements”. 3.5 Remove “Monitor the risk and compliance associated with the change. Facilitate the responsibility and accountability associated with the MOC process including the MOC change coordinator.” 3.5.3. Change “Review the MOC process” to “Follow the MOC process” 3.6 Move “Communicate MOC performance, resource requirements, and operational impacts” to element owner responsibilities. 3.7 Remove 3.7.3., 3.7.4., 3.7.5., and 3.7.6. 3.8 Rewrite Change Coordinator responsibilities

		3.8.2. Move "Ensure affected personnel are trained in Management of Change requirements" to site responsibilities. 4.1 Site Responsibilities, 4.2 Replacement in Kind, 4.3 Process MOC, 4.4 Temporary MOC, 4.5 Emergency MOC – full rewrite to align with SAP process 4.3.1., 4.7.1. Reword definition sentences to make them MOC requirements. 4.6.2., 4.7.3., 4.8.3. Change "Standards or Programs" to "Processes" 4.7.2. Remove "Vacancy of a worker", Move "Interim assignment" to Organizational MOC 4.8.3. Change "Conduct an analysis and documentation of" to "Analyze" 4.10 Added new Legal MOC section 5 Added "process MOC" 7 Add reference and link to the Process MOC Program 8 Reword document section to match standard language in other elements