



EHSS North America Business Unit Program Legal and Other Requirements (LOR)

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1 PURPOSE

The purpose of this program is to ensure that all current and applicable environmental, health and safety (EHS) legal and regulatory requirements for Mosaic's operations are identified. This document provides the process of how the requirements are identified, tracked, and maintained with regards to changes in regulatory requirements. It also ensures that changes in assets or processes are assessed and managed to maintain compliance with all applicable legal and other requirements (LOR).

2 SCOPE

This program applies to all Mosaic North America Business operations and distribution facilities, employees and contractors working at Mosaic facilities. The program pertains to periodic reviews and management of LOR registers in accordance with the Mosaic Management System (MMS) Element 04: Legal and Other Requirements policy and with legal requirements where applicable.

3 APPENDICES

The following appendices are associated with this Program:

Appendix	Appendix Title
A	Legal and Other Requirements Review Swimlane and Process Flow
B	Notification of Completed LOR Review Email Template
C	LOR Review Questionnaire Checklist

4 RESPONSIBILITIES BY ROLE

4.1 LOR Reviewer (may be performed by a 3rd party consultant)

- 4.1.1 Be knowledgeable in site operations and the LOR that is applicable to the site.
- 4.1.2 Compile a draft summary of changes from the review period that may impact the sites.
- 4.1.3 Review site LOR checklists and final summary of changes provided by LOR Working Group to determine if site LOR updates are needed.
- 4.1.4 Update LOR register as necessary following periodic reviews.

4.2 LOR Working Group

- 4.2.1 The LOR Working Group shall consist of a cross functional team with working knowledge of regulatory processes within their respective geography which



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may include but is not limited to site and business unit EHS, Governmental Relations, and Legal professionals.

 **Note:** If Legal is not part of the LOR Working Group, a Legal review shall be completed prior to sending LOR Review notification.

- 4.2.2 Review the draft summary changes provided by the LOR Reviewer from periodic LOR reviews to determine the impact to sites and propose follow up action items and provide to Site EHS for their review and comment.
- 4.2.3 Review site EHS LOR checklists and comments from the summary of changes from periodic LOR reviews and provide final list of changes to LOR Reviewer.
- 4.2.4 Determine if all changes in new or revised LOR were captured by the LOR Reviewer.
- 4.2.5 Develop and maintain a schedule for periodic reviews.
- 4.3 Site EHS
 - 4.3.1 Assist in identification of requirements applicable to the site.
 - 4.3.2 Identify changes in assets and processes that occurred at the site since the previous LOR review.
 - 4.3.3 Complete the LOR Questionnaire Checklist.
 - 4.3.4 Review the draft summary of changes and proposed follow up actions provided by the LOR Working Group to determine if changes are applicable to the site, with input from internal legal support as needed, and provide comments back to the LOR Working Group.
 - 4.3.5 Participate in the formal MOC processes to support maintaining site LOR register (eg. Initiate MOC, perform actions).
- 4.4 EHS Assurance
 - 4.4.1 Provides LOR Reviewer with completed LOR Questionnaire Checklists from the sites.
 - 4.4.2 Send notification of completed LOR review to communicate a summary of the changes and identify any calls to action as indicated from the list of changes.
 - 4.4.3 Provide training as needed to systems related to LOR register.
 - 4.4.4 Maintain Notification of Completed LOR Review email distribution lists.

5 LOR REGISTER

- 5.1 Site EHS personnel shall assist in identification of requirements applicable to the site.
- 5.2 Requirements will be maintained in an auditable electronic database or tool.



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- 5.3 Changes to the LOR Register shall follow a formal MOC process.
- 5.3.1 Changes to site assets, processes, or operations shall be reviewed for impacts to the site LOR register and supporting actions documented and tracked following the Process MOC process.
-  **Reference:** [Process Management of Change \(MOC\) Program](#)
- 5.3.2 Changes to site permits shall be reviewed for impacts supporting actions documented and tracked to completion.
-  **Reference:** [NAB-Environmental-Agency Follow Up and Critical Conditions](#)
-  **Reference:** [NAB-Environmental-Permit Application Tracking Dashboard](#)
- 5.3.3 Changes to the LOR Register identified through the periodic LOR reviews shall be reviewed to identify action items which shall be documented and tracked to completion.

6 PERIODIC LOR REVIEWS

- 6.1 LOR Registers will be reviewed at least semi-annually.
- 6.2 A schedule of reviews for the year should be agreed upon by the LOR Working Group prior to the beginning of the year.
- 6.3 Reviews will generate a list of changes from the review period that may impact the sites, including the following:
- 6.3.1 Changes to regulations identified within sites' existing LOR registers,
- 6.3.2 Upcoming regulatory changes, and
- 6.3.3 Changes in assets or process identified by the site.
- 6.4 Changes in assets and process will be collected by site EHS using the LOR Review Questionnaire Checklist.
- 6.5 Action items generated from these reviews shall be documented and tracked to completion.
- 6.6 The final list of changes identified from the periodic review shall be reviewed and approved by the LOR Working Group.
- 6.7 EHS Assurance will send notification of completed LOR review to communicate a summary of the changes and identify any calls to action as indicated from the list of changes to site leaders and site EHS.

 **Information:** Notification of Completed LOR Review will be sent to the **NA LOR Review Canada** or **NA LOR Review US** email distribution list. To request



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changes to this list, please submit an [Email Distribution List Request](#) ticket with the Global Service Desk.

7 TRAINING

- 7.1 The **Legal & Other Requirements Awareness Training** online training course is required for Mosaic employees with responsibilities within this program.
- 7.2 Training records shall be maintained as per Global Records and Information Management Policy.

 **Reference:** [Global Records and Information Management Policy](#)

8 PROGRAM REVIEW

- 8.1 A full review of this program will be conducted every 7 years and updated as required.

9 RECORD RETENTION

- 9.1 Refer to the Global Records and Information Management Policy for record retention requirements.

 **Reference:** [Global Records and Information Management Policy](#)

10 REFERENCES

References
MMS Element 04 – Legal and Other Requirements (126131532)
Process Management of Change (MOC) Program (4488701)
NAB-Environmental-Agency Follow Up and Critical Conditions
NAB-Environmental-Permit Application Tracking Dashboard
Global Records and Information Management Policy (110891305)

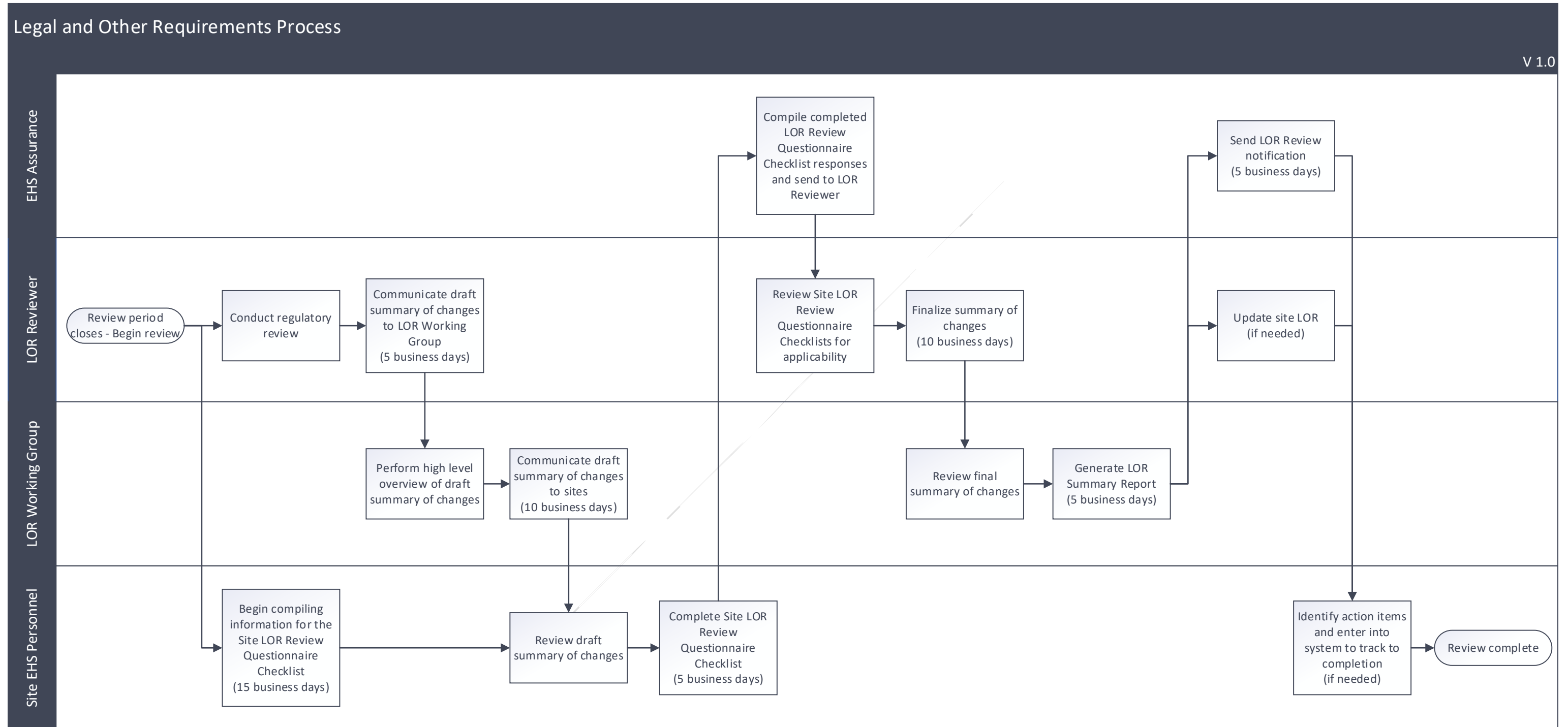
11 REVISION LOG

Rev. No.	Rev. Date	Revised By	Reason for Revision
0	08/15/2024	L. Blackwelder, D. Ford, B. Niec, A. Ottenbreit	Initial release



Legal and Other Requirements Review Swimlane and Process Flow

North America Business Program – Legal and Other Requirements (LOR), Appendix A



**Note: Timeframe included is typical but may be adjusted as needed.*



Notification of Completed LOR Review Email Template

North America Business Program – Legal and Other Requirements (LOR), Appendix B



YYYY-QX Legal and Other Requirements

Review Summary: Region (Canada or US)

Date

A review of site LORs has been completed based on any regulatory changes and site submitted LOR Review Questionnaire Checklist from this period. Below is a summary of any identified applicability.

Change Summary	• Changes identified based on Regulation Changes: ○ Include high level description of changes (eg Western Prairie Fringe-Orchid has moved from threatened to endangered) • Changes identified in based on site checklist responses: ○ Include high level description of activities (if nothing was returned from sites write None) <i>Note: Additional details can be seen in the table below.</i>
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References

- The attached documents are reference material for the change(s):
 - LOR Review Questionnaire Checklist (Intelex)
 - Regulatory Change Log



Notification of Completed LOR Review Email Template

North America Business Program – Legal and Other Requirements (LOR), Appendix B

Table of identified changes:

Section/Sub Section	Citation	Effective Date	Verification / Change Identified	Impact To LOR	Site Instruction
Species at Risk Act	Species at Risk Act : SOR/2022-14	3-Feb-2022	Site to inform their contractors that any assessments involving vegetation surveys of the following: Western Prairie Fringed-Orchid has moved from threatened to endangered. (moved from Sch 1, Part 1 to Part 2)	No Impact to LOR	Notification for communication purposes only.

Call to Action	Site & Business Unit Leaders to review the change in regulatory requirements and cascade to appropriate personnel.
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If You Are a:	Please Do This:	So That:
Site & Business Unit Leaders	- Review LOR changes and identify any actions necessary for the site. - Assign and track identified actions.	The site adheres to the required regulatory compliance requirements.



LOR Review Questionnaire Checklist

North America Business Program – Legal and Other Requirements (LOR), Appendix C

NAB-LOR. 1: Review and describe capital project changes at site.

Review capital projects in progress for this review period for the potential to trigger new EHS legal and other requirements for the facility, process, or Mosaic. For capital projects with potential to trigger new EHS legal and other requirements, provide a short description along with timing. Please state any environmental permits including permit number and version that were obtained because of the capital project and comment if any new chemicals were brought in or materials were removed from site.

NAB-LOR. 2: Review and describe all facility site MOC details (Number, Description).

Review all facility Management of Change entries created in the current review period to ensure that any legal implications of the change are accounted for within the steps of the MOC. Please provide any new EHS legal and other requirements that resulted from the implementation of the change.

NAB-LOR. 3: Review and describe any new or updated EHS permit details.

Has the facility obtained any other new or updated permits for the current review period? If so, please provide the permit number and version, along with a brief description and reference link. Include any environmental permits obtained during the current review period if not already mentioned in your response to questions 1 or 2. Note: if the permit has already been submitted for entry into EC, you do not need to resubmit information.

NAB-LOR. 4: Review and describe any Incident, Self-Assessment, or Risk Registry changes.

Did corrective actions resulting from incidents, near misses, self-assessments or emergency response drills trigger applicability of new EHS legal and other requirements?

NAB-LOR. 5: Describe any miscellaneous LOR changes with potential impact.

Are there any other potential impacts to trigger new EHS legal and other requirements or eliminate existing EHS legal and other requirements for the current review period? If so, provide short descriptions for additional items with potential impact to EHS legal and other requirements. Were programs or policies issue or revised as a result of new EHS legal and other requirements. Please indicate if your site has had a change in operational status.