



Guidelines for Fair Disclosure to the Investment Community

Policy Number: CORP-LEG-POL-150

Policy Owner: Legal Team

Effective Date: May 2012

Policy Contact(s): Chief Legal and
Administrative Officer and Corporate Secretary

Date of Last Review: June 22, 2022

Purpose

Compass Minerals International, Inc. ("Compass Minerals") seeks to provide current and prospective investors, analysts and other market participants with clear, useful and timely information in compliance with all applicable securities laws, including Regulation FD. To ensure compliance with Regulation FD and avoid selective disclosure of material, non-public information, Compass Minerals has established these Guidelines for Fair Disclosure to the Investment Community (these "Guidelines").

Scope

These Guidelines apply to every member of the Board of Directors, executive officer and employee of Compass Minerals and each of its affiliates and subsidiaries.

Policy Statement

General

As a public company, it is critical that all external communications with investment analysts, the media, and investors be consistent and accurate. Public statements on Compass Minerals' behalf must be made only by Authorized Spokespersons (as defined below).

Authorized Spokespersons

Only the following individuals (each, an "Authorized Spokesperson") are authorized to communicate with the investment community (including analysts, stockbrokers and individual and institutional stockholders) on behalf of Compass Minerals:

- President and Chief Executive Officer (the "CEO")
- Chief Financial Officer (the "CFO")
- Chief Legal and Administrative Officer and Corporate Secretary (or the head of Compass Minerals' Legal function, the "CLAO")

- Investor Relations representatives (the head of Compass Minerals' Investor Relations function and any other members of the Investor Relations function designated as Authorized Spokespersons by the CFO or the CLAO)

Additional individuals may be designated as an Authorized Spokesperson by the CFO or the CLAO.

Any communications with the media must be in compliance with the company's Media Policy. Corporate Affairs is designated as Compass Minerals' principal media contact and company spokesperson when interacting with the media.

End of Quarter Communications and Meetings

1. Quiet Period. The period beginning on the eighth business day of each quarter and ending at the time of the earnings release's conference call for the prior quarter will be observed as a quiet period with no formal or informal business-related discussions between the investment community and Compass Minerals, including by Authorized Spokespersons. Exceptions to the quiet period, based on a need to discuss breaking news or otherwise, may only be made with the approval of the CLAO.

2. Analyst Meetings and Conference Calls. All meetings and conference calls to discuss material non-public quarterly, annual or long-range financial and business information or strategic perspectives should be simultaneously broadcast over the internet or via telephone conference call to all interested members of the public, unless other actions are taken to make such meeting or conference call compliant with Regulation FD. Appropriate advance notice of the meeting and the simultaneous broadcast will be made in a press release or other method of communication in compliance with Regulation FD.

3. Earnings Press Release. Earnings press releases will be broadly disseminated through a reputable press release distribution service, furnished to the SEC on a Form 8-K and posted on Compass Minerals' corporate website prior to the commencement of the broadcast in accordance with applicable SEC and NYSE rules, including Regulation FD.

4. Guidance. Guidance regarding earnings or other financial measures may be provided in the earnings press release. Compass Minerals will have no obligation to update this guidance. Any modifications to this guidance or additional guidance may only be made in accordance with Regulation FD, with the approval of the CLAO and the CFO.

Communications with Analysts

1. Review of Analyst Reports. When reviewing analyst reports (whether in draft or published format), the CEO, CFO and Investor Relations representatives must limit external comments to the following: (a) correcting historical factual information, (b) pointing out apparent errors in statements attributed to Compass Minerals, (c) pointing out apparent mathematical errors in calculations, (d) pointing out information that is in the public domain, (e) providing non-public information Compass Minerals believes is clearly not material, and (f) generally discussing the factors that might influence the underlying assumptions used for future projections. The CEO, CFO and Investor Relations representatives may not endorse or comment externally on long-term

projections and conclusions in analyst reports. Apart from the CEO, CFO and Investor Relations representatives, other Authorized Spokespersons may not comment externally on analyst reports.

2. Review of Earnings Models. Compass Minerals, including the Authorized Spokespersons, will not provide comment externally on earnings models, other than pointing out apparent mathematical errors in calculations.

Definitions

- **Regulation FD** means the Regulation Fair Disclosure promulgated by the SEC
- **SEC** means the U.S. Securities and Exchange Commission
- **NYSE** means the New York Stock Exchange

Reporting Concerns and Seeking Guidance

All employees are required to report any known or suspected violations of our Code of Ethics and Business Conduct (our “Code”), any Compass Minerals’ policy or applicable law to a manager, supervisor, HR representative, the Compass Minerals Ethics Hotline or another Company Resource. Reports made through the Ethics Hotline may be anonymous as permitted by local law. Compass Minerals prohibits any retaliation (such as termination) against anyone who in good faith reports activity or behavior that he or she reasonably believes is unlawful, unethical or in violation of our policies.

Our Code can be found on Compass Connect, on the company’s website (compassminerals.com), or by contacting Human Resources. A full list of Company Resources is located at the end of our Code. Employees are encouraged to use Company Resources if they have questions about this or any other company policy.

Copies and Modifications

Edits and modifications to this policy must be approved pursuant to Compass Minerals’ Policy Charter. Copies of this policy, either in digital or printed form, are for reference purposes only. Employees should refer to Compass Connect in order to view the official current version of this policy.

Related Policies/References

- Media Policy

Review History

The below information is for informational purposes only and does not constitute a material portion of this policy.

Date Revised	Version #	Brief Summary of Key Revisions
June 22, 2022	3	Reformatted onto corporate policy template; updated titles of Authorized Spokespersons; clarified policy.