



SUSTAINABILITY

FEEDING THE WORLD RESPONSIBLY

2015 U.N. Global Compact
Communication on Progress



Agrium



2015 UN Global Compact Communication on Progress

Statement of Continued Support

Agrium produces, markets and distributes our products and services thoughtfully and responsibly, with the goal of enabling growers around the world to sustainably intensify the productivity of their land. Through our global presence, Agrium creates employment, advances development in rural areas and acts as a catalyst in promoting collaboration and stakeholder involvement in the solutions needed to address the challenges of a hungry world. We continue to initiate these ripples of change to realize our vision to help feed the world responsibly.

Agrium became a signatory to the United Nations Global Compact in April 2008. This global network is an ideal avenue for sharing and learning about best practices, and for continuing to engage in open dialogue with our stakeholders.

Our participation in the United Nations Global Compact clearly demonstrates to our employees, communities, suppliers, customers, and to the public, our deep commitment to continually improving our human rights, labour, environmental, and anti-corruption performance. We remain committed to the ten principles of the Global Compact and to the organization itself.

The following table includes descriptions of Agrium's commitment, systems, activities and outcomes that address the ten Global Compact principles.

A handwritten signature in black ink, appearing to read "C. Magro".

Chuck Magro

President and CEO

Actions and Outcomes

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<p>Human Rights Principles</p> <p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.</p> <p>Principle 2: Businesses should ensure that they are not complicit in human rights abuses.</p>	<p>As part of Agrium’s participation in the United Nations Global Compact, we have made the following human rights commitments:</p> <ul style="list-style-type: none"> • We will not take part in human rights abuse, and will not engage or be complicit in any activity that solicits or encourages human rights abuse. • In providing for the protection of company personnel and assets by public or private security forces, we will promote respect for, and protection of, human rights. <p><u>Policies and Codes of Conduct</u></p> <p>Although Agrium operates mostly in countries where there are numerous regulations addressing human rights issues and there is low risk of human rights abuses, we take our role to “respect, protect and remedy” human rights seriously. Agrium's policies and Code of Business Conduct and Ethics (Code) outline our employees' rights and obligations for building a respectful and discrimination-free workplace. Our Code is our means of management oversight for ensuring ethical behavior. Among other issues, it addresses: conflict of interest, fair dealings, gifts, legal compliance, and confidentiality. Our Corporate Social Responsibility (CSR) policy also addresses human rights.</p> <p>Agrium is interested in operating in developing nations, not only to expand our markets, but also to help provide the essential building blocks for economic development. We believe that the ability to produce safe and abundant food is fundamental to reducing poverty, advancing education and stabilizing economies. In deciding if we should enter a specific developing nation, we conduct an assessment that looks at risks related to corruption, economic sanctions, land disputes, or a poor record on human and indigenous rights, among other considerations. Once we decide to enter a country, we also make commitments to apply our company-wide policies (often exceeding national regulations), source supplies and employees locally as much as possible, and invest in the communities where we operate.</p> <p>We believe Agrium’s role in supporting sustainable development includes evaluating our significant suppliers to ensure they maintain high standards of performance on safety, the environment and human rights. In 2014, we finalized a Supplier Code of Conduct. The policy, and the contractual language that supports it, encourages collaboration and greater alignment between Agrium and our large suppliers on corporate social</p>

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	<p>responsibility practices and commitments.</p> <p>In 2015, we began the process of implementing the Supplier Code in all new contracts with suppliers that meet our risk threshold. In addition, we identified more than 140 existing suppliers that required review. Many of our suppliers have their own codes that are aligned with Agrium's. For those codes that are not aligned, we are working to ensure these suppliers acknowledge our Supplier Code. The review and screening is not a one-time event, but a continuous process as suppliers and their activities evolve. Through this process, four potential suppliers were turned away in 2015 due to concerns regarding child labor practices and corruption. A public reporting hotline complements the Supplier Code.</p> <p>We continue to monitor international standards and developments to assess whether the Supplier Code or its associated review criteria require revision. Agrium exercises due diligence to promote respect for human rights, and is guided by laws and international standards including the U.N.'s Guiding Principles on Business and Human Rights. More actions and outcomes are available in the Supplier Code section of our website.</p> <p><u>Training</u></p> <p>Agrium's Directors and employees worldwide undergo refresher training and formally acknowledge their compliance with the Code on an annual basis. In our sustainability report, we annually disclose the number of employees that received training related to the Code, anti-corruption and competition law each year (see Principle 10). Implementing the Supplier Code across our organization also includes employee training. Beginning in 2015, we augmented our training on our Code of Business Conduct and Ethics with specific training and testing on the Supplier Code targeted at higher risk employee groups.</p> <p><u>Compliance Hotline</u></p> <p>Employees can access our confidential 24-hour, externally administered Compliance Hotline throughout the world in 11 languages. The Hotline is available for reporting any violations or suspected violations of the Code, other Agrium policies, or any other illegal or unethical behavior. Every reported case is taken seriously and investigated as appropriate.</p> <p>Agrium has a non-retaliation policy designed to enable employees to raise good faith issues in a safe environment without fear of retaliation. The Hotline also allows for anonymous reporting where legally</p>

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	<p>permissible. Agrium employees are encouraged to report any violations of the Code to their supervisors or any member of senior management, or through the Hotline. Employees can also ask questions related to ethics and business conduct matters through a dedicated email address and through other avenues.</p> <p>During 2015, Agrium addressed 38 inquiries made via our global Compliance Hotline and the Human Resources service center, which does not include reports made directly to managers, Human Resources staff, local incident management systems or via other legal processes. Of these, 18 were human resources-related or contained comments about the work environment, six involved allegations of misappropriation of company assets, four involved allegations of discrimination, three involved EHS&S allegations, three were categorized as other, and four were unrelated to ethics compliance. All calls were forwarded to our legal department, appropriate action was taken and the Board was advised. A substantiated allegation might result in employee education, discipline or dismissal, or revisions to our communications, procedures or policies.</p> <p>For additional outcomes, please see the Performance Tables on our website, specifically the Workplace Section.</p>

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<p>Labour Principles</p> <p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.</p> <p>Principle 4: Businesses should support the elimination of all forms of forced and compulsory labour.</p> <p>Principle 5: Businesses should support the effective abolition of child labour.</p> <p>Principle 6: Businesses should support the elimination of discrimination in respect of employment</p>	<p>Agrium's policies and Code of Business Conduct and Ethics (Code) outline our employees' rights and obligations for building a respectful and discrimination-free workplace. Agrium's CSR policy also addresses human rights.</p> <p><u>Collective Bargaining</u></p> <p>Agrium's relationship with labour unions is critical to the reliable operation of our facilities. Employees at Agrium are free to organize into trade unions. We have operated for many years without a labour disruption to operations. We successfully renegotiate union contracts regularly.</p> <p><u>Health and Safety</u></p> <p>Agrium is committed to the safety of our employees, contractors, carriers, customers, neighbors and the general public. Safety permeates the lifecycle of our products, from responsible raw materials sourcing, to safe production and transportation, sales, and end-use of our products by customers. We reinforce our strong safety culture daily with ongoing awareness, training, procedures, equipment and continual improvement measures.</p> <p>Our goal is to relentlessly pursue the prevention of harm through managing risks in our organization and by actively caring for each other, our customers and the community.</p> <p>Our integrated Environment, Health, Safety and Security Management System (EMS) contains the minimum standards expected of each employee. The EMS guides us on expectations regarding how to conduct work safely, including key behaviors on risk management, stop-work obligations, incident reporting and investigation as well as meeting life-critical work standards. Each production and retail location develops site-specific processes and training to adhere to these standards.</p> <p>These standards apply to our facilities worldwide. We audit every manned and unmanned Agrium facility every three years and conduct regular compliance reviews. Higher risk facilities are audited yearly. A more detailed description of our EMS is included in the Environmental, Health, Safety & Security Disclosure on Management Approach on our website.</p> <p><u>Diversity and Inclusion</u></p> <p>Agrium takes action to support labour rights by maintaining and enhancing a diverse and inclusive workplace</p>

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<p>and occupation.</p> <p>Please see the following Disclosure on Management Approach (DMA) document on our website:</p> <ul style="list-style-type: none"> • Environment, Health, Safety and Security 	<p>culture. At Agrium, people are valued because of, not in spite of, their differences. A diverse workforce includes people of varied race, ethnicity, culture, religion, experience, heritage, age, gender, sexual orientation and other characteristics.</p> <p>Agrium’s efforts begin with our Inclusive Workplace Policy, which articulates our vision for building a diverse and inclusive work environment. The policy includes:</p> <ul style="list-style-type: none"> • a philosophy that extends to all stakeholders, employees, customers and suppliers; • clear definitions of diversity and an inclusive workplace; • our commitment to diversity; • the expectations of employees and leaders with respect to an inclusive work environment; and • recourse procedures should an individual believe he or she is treated inappropriately. <p>In addition, Agrium’s Code of Business Conduct and Ethics prohibits workplace discrimination at any level of the company. In 2015, we recorded and addressed four allegations of discrimination.</p> <p>Our efforts on diversity and inclusion are supported at the executive level through our Diversity Inclusion Council, which consists of senior leaders who actively facilitate the integration of diversity and inclusion into Agrium’s business and talent management practices. We monitor, track and benchmark our diversity on the basis of turnover, internal moves and hiring practices.</p> <p>An area of focus within Agrium has been gender diversity. In 2014, we approved a target that women comprise at least 15 percent of senior leader roles (i.e., executive officers, vice presidents and typically roles reporting to vice presidents) by 2019. In making senior leadership appointments, Agrium considers candidates based on merit, but also considers the existing number of women in senior leader positions.</p> <p>In 2016, we set a target that women comprise not less than 25 percent of Agrium’s Board of Directors. In 2015, more than one in five Agrium female salaried employees in North America received a promotion or development move.</p> <p>Agrium maintains an employee Compliance Hotline to respond to a variety of ethics concerns or inquiries. We require employees to annually undergo refresher training and acknowledge their compliance with the Code.</p>

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	<p><u>Supply Chain</u></p> <p>We do not operate in locations where there might be significant risk of incidents of forced, compulsory or child labour. However, we further support human rights and sustainable development by working with our suppliers. In 2015, we began the process of implementing the Supplier Code in all new contracts with suppliers that meet our risk threshold. In addition, we identified more than 140 existing suppliers that required review. The review and screening is not a one-time event, but a continuous process as suppliers and their activities evolve. Through this process, four potential suppliers were turned away in 2015 due to concerns regarding child labor practices and corruption.</p> <p>For more details, please see Principles 1 and 2.</p>
<p>Environmental Principles</p> <p>Principle 7:</p> <p>Businesses should support a precautionary approach to environmental challenges.</p> <p>Principle 8:</p> <p>Businesses should undertake initiatives to promote greater environmental responsibility.</p> <p>Principle 9:</p>	<p>Although Agrium has not formally adopted the precautionary principle, we apply the precautionary approach to environmental challenges through our risk management process, use of management systems and regularly engaging our stakeholders. Our dedication to product stewardship and the promotion of best practices in agriculture demonstrates a commitment to proactively identify, and prevent or mitigate negative environmental impacts. Comprehensive environmental stewardship programs are a key part of our activities, including ongoing efforts in energy efficient operations, responsible transportation, and sustainable end-use of our products. This structure enables us to be an environmental steward on the farm and in our own operations.</p> <p>As the largest retailer of crop inputs in North America and Australia, and a company with a worldwide scope and scale of operations, Agrium has both a responsibility and an opportunity to positively affect the most pressing global environmental challenges we face today. We have direct impacts through choices and decisions we make throughout our product lifecycle. We influence and affect wide-reaching positive change through collaboration and education.</p> <p><u>Enterprise Risk Management</u></p> <p>Every business decision is a risk decision. Evaluating and balancing risk is a vital, ongoing responsibility at Agrium. We also realize that every risk might also present business opportunities.</p> <p>In addition to financial issues, we integrate the environment, health, safety and security of our employees</p>

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<p>Businesses should encourage the development and diffusion of environmentally friendly technologies.</p> <p>Please see the following Disclosure on Management Approach (DMA) documents on our website:</p> <ul style="list-style-type: none"> • Environmental, Health, Safety and Security (EHS&S) • Chemicals and Crop Protection • Nutrient Stewardship • Food Supply and Security • Public Safety 	<p>and the public into a structured Enterprise Risk Management process.</p> <p>Agrium uses a risk matrix tool to assess the potential impact of risks, ranking them based on how likely they are to occur and the severity of their impact. We also take into account inherent and residual risks, which are defined by our ability to control the risk. We then assign risk owners who apply this understanding to mitigate risks as much as possible and continually monitor both the risk and its mitigation.</p> <p>Internal auditors review risks on a number of factors, including financial controls, product prices and the labor market. In 2014-2015, we conducted more than 100 internal business audits, and 20 risk review and mitigation workshops with key employee groups to guide them in developing risk mitigation strategies. Internal experts conduct more than 700 EHS&S audits of compliance and other management system requirements specific to our facilities. Risk owners have access to a risk register where more than 100 active risks are profiled.</p> <p><u>Environment, Health, Safety and Security Management System</u></p> <p>Our integrated Environment, Health, Safety and Security Management System (EMS) contains the minimum standards expected of each employee. The EMS guides us on expectations regarding how to conduct work safely, including key behaviors on risk management, stop-work obligations, incident reporting and investigation as well as meeting life-critical work standards. Each production and retail location develops site-specific processes and training to adhere to these standards.</p> <p>These standards apply to our facilities worldwide. We audit every manned and unmanned Agrium facility every three years and conduct regular compliance reviews. Higher risk facilities are audited yearly. A more detailed description of our EMS is included on our website in the EHS&S DMA.</p> <p><u>Stakeholder Engagement</u></p> <p>Engaging with our stakeholders is central to Agrium’s sustainability practice. We believe in open, ongoing, two-way dialogue across a variety of communication channels, and addressing concerns in a meaningful manner. This collaborative approach is essential to Agrium’s success and part of the ongoing license to operate that we earn through our actions on a daily basis.</p> <p>We define stakeholders as persons or groups that Agrium directly or indirectly affects, as well as those who</p>

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	<p>might have interest in Agrium. The type and frequency of our stakeholder engagement is based on the scope and potential impacts of our operations, and the degree to which parties wish to be involved.</p> <p>When we open, significantly modify or close a facility, we include neighbors, businesses and other local stakeholders in the decision-making process through dialogue and open houses. For more routine activities, we share information and ensure there are open lines of communication as well as opportunities for people to ask questions or provide comments. Community Advisory Panels for three of our major production facilities provide insights and often identify solutions to local issues. The panels comprise local industry, first responders, representatives from school districts and independent community members. We work also with regulators and industry experts to extract raw materials in a manner that will minimize long-term environmental impacts and enable reclamation of the land. In our production processes, we work with our employees and external experts to maximize energy efficiency, reduce emissions, and prioritize safety. We work with customers, carriers and government to continually improve the security and effectiveness of our distribution system. We work with researchers, industry associations, and growers to ensure our products are applied using best management practices to improve environmental, social and economic performance.</p> <p>For further information on actions and outcomes related to stakeholder engagement, please see our 2014-2015 Sustainability Report.</p> <p>ON THE FARM</p> <p>Most of the environmental impacts related to our products occur at the farm level where the services, seeds, nutrients and crop protection products we produce and sell are applied. Agrium’s business is increasingly focused on providing growers with locally applicable services and products that help minimize chemical application rates and prevent environmental losses, while optimizing crop yields. We also work with industry and other stakeholders to actively promote sound agricultural principles that are proven to dramatically reduce nutrient runoff and air emissions from farms.</p> <p>Customized Technology and Services</p> <p>Agrium’s retailers promote environmental improvement at the farm level through the knowledge of hundreds of certified crop advisors and other experts who are trained to help farmers make decisions that result in higher yields with less environmental impact. Implementing comprehensive agricultural knowledge</p>

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	<p>can help growers achieve greater value from crop inputs, while reducing their air emissions, nutrients lost to the environment, soil degradation, and energy and water use.</p> <p>Agrium has been a leader in precision agriculture for more than a decade and we offer best-in-class solutions for crop management through our Echelon technology platform. Echelon enables our crop advisors to access years of data, including soil and plant sample analyses, variable nutrient application and seeding rates, weather modeling, precision yield scouting and GPS satellite imagery. Our advisors then provide farmers with field-specific solutions based on their data analyses and the latest research.</p> <p>This information provides each farmer with a customized prescription that places our products precisely where they are needed, when they are needed and in the right amounts. We know that all soils are not created equally. This targeted approach increases crop input efficiency with less waste and potential runoff, while improving crop yields and quality.</p> <p>Agrium’s retail business is growing the use of our Echelon-guided precision agriculture services platform. Currently, we provide this multi-crop service offering to an estimated 68,000 growers on more than 24 million acres of farmland across North and South America.</p> <p>Advances in Products</p> <p>The type and amount of nutrients required for optimal crop growth depends on soil fertility, weather conditions and numerous other factors. Agrium produces and markets three primary crop nutrients—nitrogen, phosphorus and potassium—in a variety of products that help growers replenish their soils responsibly.</p> <p>Our controlled-release nitrogen fertilizer— Environmentally Smart Nitrogen® (ESN)—is a polymer-coated urea product, which offers several key advantages in specific conditions over traditional nitrogen fertilizer. By delivering nitrogen when the crop needs it most, this advanced product can significantly reduce the risk of nitrogen loss to the air and water.</p> <p>Agrium’s product mix includes grain and pulse crop seed varieties that are bred to be drought and disease resistant. These advanced seed products allow growers to use less water, fertilizer and pest control products on their crops. We develop new seed varieties following strict handling requirements, using native and</p>

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	<p>engineered genetic traits that often result in less chemical load (e.g., pesticides, fertilizers) on the field.</p> <p>A non-agricultural product we produce also has environmental benefits. Our Borger, Texas expansion includes adding up to 100,000 tonnes of capacity for diesel emission fuel-grade urea. This product is used to reduce smog-related nitrogen oxide emissions from diesel vehicles.</p> <p>Product Responsibility</p> <p>Agrium is committed to complying with the extensive regulations governing product development, testing and use, but we believe product responsibility extends beyond compliance. We look across the value chain from raw material procurement to production, transport, use and future disposal to identify potential product risks.</p> <p>We have implemented our product stewardship standard that specifies practices relating to product development, quality assurance, purchasing, registration, labeling, product safety and other issues. Our programs are consistent with the underlying principles of the International Fertilizer Association’s Protect & Sustain product stewardship initiative. Longstanding concern about pesticide impacts on human and environmental health has been met with close attention and care about product use. Regulatory bodies extensively test pesticides and only authorize those that are safe for humans and the environment. Through our customer interaction, Agrium works to ensure that pesticides are used safely in the right amount and only when and where needed. Precision agriculture allows farmers to target pesticides only to specific areas that require them.</p> <p>More information on our approach to product responsibility is available in our website in the Chemicals and Crop Protection and Public Safety DMAs.</p> <p>Nutrient Stewardship</p> <p>Nutrients added to the field can be lost if managed improperly. Excess nutrients can build up in water bodies through runoff from farm fields. These excess nutrients can affect water quality by accelerating vegetative growth and the accumulation of organic matter, which lowers oxygen levels. This process is called eutrophication.</p>

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	<p>The 4R nutrient stewardship system helps to reduce nutrient losses while improving yields. Through use of the system, growers set site-specific economic, social and environmental goals that are then met by applying region-specific best management practices in the four nutrient performance areas of rate, time, place and source. Practices account for local soil, weather, crop and operational situations and can include:</p> <ul style="list-style-type: none"> • soil testing and precision placement to optimize nutrient application rates; • controlled-release fertilizers or split applications to match nutrient availability with crop need; and • vegetated buffer strips to keep nutrients where plants can use them, away from waterways. <p>Agrium agronomists work with growers to use the system, offering our Echelon services and other best management agricultural practices. The 4R system is used globally in programs in developing nations to address poverty, food security and soil health issue. In North America it is used in watershed protection programs, and in value chain programs of major food producers and retailers. The best management practices within the 4R system help increase grower income and food production, and can help reduce greenhouse gases as well.</p> <p>Crop advisors in North America are increasingly demonstrating their environmental commitment to growers by becoming officially designated in 4R practices. In Canada, the certification program was launched in 2015 and is administered through Fertilizer Canada. Several U.S. states have also adopted 4R certification of crop advisors. Agrium currently employs more than 500 certified crop advisors in our retail business unit and actively promotes grower certification in the 4R system through education and outreach activities.</p> <p>More information on our approach to product responsibility is available in our website in the Nutrient Stewardship and Food Supply and Security DMAs.</p> <p>Reduced GHGs in Agriculture</p> <p>The application of nitrogen fertilizer must be properly managed to maximize its uptake by plants and prevent the production of GHGs. For example, in waterlogged soil, nitrate can be converted to nitrous oxide (N₂O), which has a global warming potential that is about 300 times more potent than carbon dioxide (CO₂). By using the 4Rs, we reduce the amount of nitrate present in waterlogged conditions, thus reducing N₂O emissions.</p>

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	<p>Agrium was a leader in the development of a Nitrous Oxide Emissions Reduction Protocol (NERP), which defines best practices growers can employ. Avoiding nitrogen fertilizer application in waterlogged conditions is a climate smart practice that leading food companies are increasingly incorporating into their value chain. Government agencies are also supportive of NERP. Growers who use these practices can often apply for carbon offsets. A tonne of GHG emissions reduced on the farm can offset a tonne produced elsewhere.</p> <p>IN OUR OWN OPERATIONS</p> <p>Climate change, water management and incidents are the major environmental issues directly associated with our operations, as identified by Agrium and our stakeholders. Accordingly, we direct our reporting to these areas.</p> <p>Climate Change</p> <p>Agrium generates GHG and other air emissions, directly and indirectly, through the production, distribution and end use of our products. Direct emissions are generated onsite, from burning natural gas and other fuels, or from processes at our operations. Indirect emissions are from the offsite generation of purchased electricity, steam and heat.</p> <p>The production stage of our business accounts for more than 95 percent of Agrium’s total GHG emissions. We estimate that our vehicle fleet accounts for less than five percent of our GHG emissions. Our largest GHG sources are our nitrogen production facilities. Because approximately 60 percent of the natural gas required to produce nitrogen fertilizer is used to obtain the hydrogen required to produce ammonia, we are economically driven to reduce natural gas use in our production processes and consequently its associated GHG emissions. A portion of the CO₂ generated in ammonia production is diverted (i.e., not emitted) to produce urea.</p> <p>Without local carbon capture and storage infrastructure available, further process emission reductions are limited, given current economically viable technologies. Agrium has taken early action to reduce CO₂ emissions from the remaining combustion natural gas through energy efficiency and other emission reduction opportunities.</p> <p>We have comprehensive plans and activities that are designed to lower GHG and other emissions across the</p>

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	<p>full lifecycle of our products, from production to end use. We have developed a GHG emissions reduction strategy, described below, targeting three areas:</p> <ul style="list-style-type: none"> • improved energy efficiency within our operations; • increased carbon capture and storage; and • reduced emissions in agriculture (see above). <p>Improved Efficiency</p> <p>We gain economic and environmental performance improvements when we invest in the energy efficiency of our facilities, so we continue to challenge ourselves in this respect. We are on-track to achieve our target of a 20 percent reduction in our direct North American Wholesale GHG emissions intensity (per tonne of net fertilizer produced) by 2020, from our 2005 baseline.</p> <p>Energy efficiency at our production plants is directly tied to the reliability of our plants, with several of our facilities in the 30-40 year-old range. When one of these plants has an unscheduled interruption, there is a 10-15 percent increase in energy intensity at the facility. We have a five-year (2016-2020) sustaining capital plan for each of our plants, and plan to spend approximately \$1.5 billion over this period to ensure these facilities are operating at peak reliability and efficiency. In addition to energy efficiency improvements, we constantly pursue process efficiency improvements as well. While improving a process might not directly reduce energy use, it can result in an energy intensity improvement—producing more product without an increase in energy use.</p> <p>Carbon Capture and Storage</p> <p>By capturing CO₂ from our production plants and injecting it into porous geological formations deep underground, we reduce our GHG emissions to the atmosphere. We began our CO₂ capture efforts in 2001 in our Borger, Texas operation for use in enhanced oil recovery. We plan to sell CO₂ from our Redwater, Alberta plant to a third party for the same purpose once they complete the connecting pipeline.</p> <p>For further information, please see our 2014-2015 Performance Summary, specifically the Environment section.</p>

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<p>Anti-Corruption Principles</p> <p>Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.</p>	<p>As a global company, Agrium operates in a wide range of jurisdictions and is vigilant and proactive in preventing and detecting corruption. We regularly review our compliance with anti-corruption laws and regulations. We evaluate our current and potential operating jurisdictions for risk factors related to corruption and bribery, and require employees in key roles doing business in these areas to complete additional online and in-person training as appropriate. For more details, please see Principles 1 and 2.</p> <p>In 2014-2015, all active regular employees were required to take a training module on corruption prevention as part of the annual renewal process for the Code. Additionally, for employees working in higher risk areas, we conducted online and in-person anti-corruption training sessions.</p> <p>For more information on our Compliance Hotline and ethics training in 2015, please see our 2014-2015 Sustainability Report.</p>