Policy Owner: Legal Team Date: March 2017



Guidelines for Fair Disclosure to the Investment Community

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"). These Guidelines apply to every director, executive officer and employee of Compass Minerals.

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
- Chief Financial Officer
- General Counsel
- Director of Investor Relations
- Treasurer

Additional individuals may be designated as Authorized Spokesperson by the Chief Financial Officer or the General Counsel.

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 discussion 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 General Counsel.
- 2. <u>Analyst Meetings and Conference Calls</u>. All analyst meetings and conference calls to discuss quarterly and annual financial and business information should be simultaneously broadcast over the internet or via telephone conference call to all interested members of the public. 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. <u>Earnings Press Release</u>. 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 at or prior to the commencement of the simultaneous broadcast in accordance with applicable SEC and NYSE rules, including Regulation FD.

4. <u>Guidance</u>. 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 General Counsel and the Chief Financial Officer.

Communications with Analyst

- 1. Review of Analyst Draft Reports. When asked to review analyst draft reports, the Director of Investor Relations must limit review and comments to the following (a) correcting historical factual information, (b) pointing out information that is in the public domain, (c) providing non-public information Compass Minerals believes is clearly not material, and (d) generally discussing the factors that might influence the underlying assumptions used for future projections. The Director of Investor Relations may not embrace or comment on long-term projections and conclusions. Other Authorized Spokespersons may not review analyst draft reports.
- 2. <u>Review of Earnings Models</u>. Compass Minerals, including the Authorized Spokespersons, will not provide review or comment on earnings models.