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# HUMAN RIGHTS POLICY

Approved by: President & CEO  
Effective: July 27, 2020

## 1.0 Objective

The Canadian Pacific Railway Limited (“CPRL”) and Canadian Pacific Railway Company (“CPRC”) and their respective subsidiaries (collectively, “CP”) Human Rights Policy (the “Policy”) provides a framework to support the Company’s commitment to respect the universal human rights of all people throughout our operations, including our employees, the communities in which we operate and our global supply chain. The Policy supports our strategy to uphold and monitor human rights across CP’s network and operations by establishing sound due diligence, business and operational practices that minimize exposure to and incidents of human rights violations.

## 2.0 Policy Statement

Respect for human rights is fundamental to CP’s values. We recognize that all people have a right to be treated with dignity and without discrimination whatever their race, national or ethnic origin, colour, religion, language, age, sex (including status of pregnancy or childbirth) sexual orientation, gender identity or expression, genetic characteristics, disability, marital status, family status, veteran status, or conviction for which a pardon has been granted or any other characteristic protected by applicable law or status (collectively, their “Identified Individual Characteristics”). This understanding is central to our business and corporate values, and embodied in our Code of Business Ethics. This commitment applies across our value chain, and we expect our employees and those with whom we do business to do the same.

## 3.0 Scope

The Policy applies to all CP employees, directors, officers, agents, contractors and representatives (collectively “CP Personnel”) and suppliers who provide goods and/or services to CP regardless of geography (“Suppliers”). With respect to CP Personnel or Suppliers who provide goods and/or services for CP and who are not in a direct employment relationship with CP, to the extent applicable, it is expected that such CP Personnel or Suppliers will either abide by the Policy or undertake, as a condition of their engagement with CP, to adhere to the principles and standards of business conduct consistent with the Policy.

## 4.0 Commitments

The commitments reflected in this Policy are informed by international standards such as the UN Guiding Principles on Business and Human Rights, to promote the fundamental human rights of those directly involved in or affected by our operations. CP abides by all applicable human rights-related legal requirements in the jurisdictions in which it operates.

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Our commitments address our operations and extend to Suppliers in accordance with our Supplier Code of Conduct. Our employment policies, procedures and practices reflect internationally accepted labour standards and related non-discrimination principles where appropriate.

In accordance with this Policy, CP is committed to:

- Providing and maintaining a work environment that supports and protects the rights and dignity of all individuals, whatever their Identified Individual Characteristics.
- Promoting employment equity, inclusivity and diversity across our workforce.
- Maintaining a workplace that is free from harassment, discrimination, violence, or retaliation. Such conduct is not tolerated at any level within the organization.
- Promoting CP Personnel’s well-being by providing compensation and benefits, as well as hours of work that meets or exceeds legal standards.
- Protecting the physical and mental health of CP Personnel through safe work practices, provision of necessary personal protective equipment, providing safe, clean and healthy work environments (and where relevant, living conditions) that meet or exceed legal standards, and maintaining occupational health and safety practices in support of this commitment.
- Respecting employees’ right to collective bargaining and freedom of association.
- Respecting the fundamental human rights of the communities in which we operate.
- Respecting the cultures, customs and values of the communities in which CP operates, including respecting the rights of Indigenous peoples.
- Engaging and involving key stakeholders—including communities, Indigenous peoples, Suppliers and customers—to understand human rights concerns, commitments and priorities related to our operations and the Policy.
- Providing CP Personnel with information and training as appropriate to understand and consistently implement CP’s human rights commitments.
- Engaging in efforts to prevent child labour, forced labour (slave, prisoner or any form of involuntary labour), human trafficking, discrimination and corporal punishment.

## 5.0 Implementation

- Implementation of the Policy is led by the Vice-President Human Resources & Chief Cultural Officer. All CP Personnel are responsible for implementing the Policy in their work and processes they oversee.

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- CP Personnel and the public can report known or suspected issues of non-compliance with this Policy directly to their manager, Human Resources or anonymously by using CP’s independently managed Alert Line (A-Line) at 1-888-279-6235 or <http://secure.ethicspoint.com/domain/media/en/gui.22547/index.html> (“A-Line”).

## 6.0 Monitoring and Reporting

- Monitoring and reporting periodically on CP’s performance and compliance with this Policy is overseen by the Human Resources department and results are reported to CP’s Executive Committee, President and CEO and the Risk and Sustainability Committee of the Board of Directors.
- Full implementation of all commitments and appropriate monitoring and reporting requires a period of transition. CP will review procedures, communication and training needs and other documents or processes to provide for alignment, consistency and effective governance of the Policy. Accordingly, the current projected completion date for implementation of the Policy will be July 29, 2022.
- Aspects of human rights performance are communicated through CP’s annual reports, sustainability reports, website, sustainability submissions and other public disclosures.
- CP maintains clear and accessible channels for all stakeholders to report human rights issues or concerns via Community Connect – our community engagement platform, to a specific CP team via our website contacts page or anonymously by using CP’s A-Line.

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