	<b>Mexico Pacific</b> Human Rights Policy	
	Document No. MP-0000-MPL-GR-POL-00002	

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## 1.0 Purpose

This Policy provides the foundation to our human rights approach. This Policy is an integral component of MXP’ corporate governance and is intended to establish standards and guidelines to human rights and labor practices in the areas, countries and communities where we operate. The policy applies to MXP’s personnel, including employees, and temporary or contingent workers. MXP will seek to impose this Policy on third party consultants, and suppliers, including contractors, subcontractors, and vendors who undertake activities on behalf of MXP and its subsidiaries and affiliates. Alternatively, MXP will request such third-party vendors and suppliers comply with the IFC Performance Standards on Environmental and Social Sustainability Performance Standard 2: Labor and Working Conditions.

In the framework of labor practices, this Policy seeks to promote a workplace that is free from all forms of harassment on any grounds and discrimination based on any diversity factor (gender, age, race or any other personal distinction), by prohibiting and enforcing disciplinary measures against actions and behaviors that undermine dignity and respect for universal human rights, and putting in place the appropriate measures to support and strengthen ethical conduct in an environment that upholds equality and fosters diversity and inclusion.

In the framework of Human Rights, MXP regards respect for the inherent dignity of people and their inalienable rights as a fundamental part of its corporate responsibility, and as an essential requirement for conducting its business activities in any country or social environment. Accordingly, in addition to complying with the applicable laws of each country where MXP operates, and consistent with its Code of Ethics and Business Conduct, MXP has drafted and adopted this Policy in accordance with international laws and practices such as the Universal Declaration of Human Rights of the United Nations, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), and Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Likewise, it adheres to the Declaration on the Rights of Indigenous Peoples of the General Assembly of the United Nations and ILO Convention 169 on Indigenous and Tribal Peoples.

### 1.1 Acronyms & Definitions

Acronym/Term	Definition
ESG	Environment, Social, Governance
Human Rights	Human rights are rights inherent to all human beings, regardless of race, color, religion, belief, political opinion, sex, national origin, ethnic origin, ancestry, age, physical or mental disability, medical condition, childbirth, family and medical care leave, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation or any other characteristic protected by local law, regulation, or ordinance. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination or harassment on any grounds.
ILO	International Labour Organization
MXP	Mexico Pacific Limited
OECD	Organization for Economic Co-operation and Development

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Acronym/Term	Definition
UNGP	United Nations Guiding Principles on Business and Human Rights

## 2.0 Scope and Application

This Policy applies to all MXP personnel, including employees, and temporary or contingent workers. . MXP will seek to impose this Policy on third party consultants, and suppliers, including contractors, subcontractors, and vendors who undertake activities on behalf of MXP and its subsidiaries and affiliates. Alternatively, MXP will request such third-party vendors and suppliers comply with the IFC Performance Standards on Environmental and Social Sustainability Performance Standard 2: Labor and Working Conditions.

Mexico Pacific Limited (“ we” or “MXP”) respects and supports the dignity, well-being, and human rights of our employees, the communities in which we live, and those affected by our operations. MXP commits to respect human rights in all our activities and to respect national laws and internationally recognized human rights standards including the Universal Declaration of Human Rights, the principles set forth in the fundamental conventions of the International Labour Organization, and the United Nations Guiding Principles on Business and Human Rights (UNGP).

MXP expects our contractors, subcontractors and vendors (“suppliers”) to maintain responsible employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes. We expect our suppliers to have in place policies and due diligence measures to prevent risks of adverse impacts in their operations and supply chains and we expect our suppliers to maintain ethics programs and standards aligned with ours.

### 2.1 Commitments

- We conduct our business consistent with the spirit of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work; the International Bill of Human Rights; and other applicable international human rights principles, with respect for the rights and dignity of all people.
- We treat people fairly, without discrimination and harassment on any grounds in the workplace. We are committed to maintaining a work environment in which all individuals are treated with respect and dignity.
- We prohibit forced labor, all forms of slavery and human trafficking. We are committed to freely chosen employment. We will not use or tolerate the use of forced, debt bonded, indentured or prison labor, or human trafficking in any form in our business or supply chain. We will act against such practices if identified.
- Child labor is strictly prohibited. The minimum age for employment or work shall the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher, provided that this requirement does not prohibit participation in legitimate and lawful workplace apprenticeship programs.

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- We acknowledge and respect Indigenous peoples’ connections to lands and waters, consistent with the UN Declaration on the Rights of Indigenous Peoples.
- We respect the freedom of association and the right to organize in accordance with ILO principles.
- We strive to provide safe, secure, and healthy working environments and are committed to environmental stewardship and sustainability.
- We foster a culture of respecting human rights among our employees. We implement tools and policies to promote awareness, and to prevent the infringement of these rights.
- We ensure that our employees have access to communication and reporting channels that allow them to notify MXP of situations of possible impacts on their rights.
- We respect our employees and customers right to privacy, utilizing appropriate measures to protect and make proper use of any personal data that we are provided.
- We provide access to remedies for impacted stakeholders through the establishment and operation of grievance mechanisms aligned with the UNGP effectiveness criteria.
- We make our temporary or contingent workers, consultants, and suppliers, including contractors, subcontractors, and vendors aware of, and request their compliance with, our human rights commitments. MXP requires its personnel, including employees, temporary or contingent workers, to act in conformity with the principles outlined in this Policy through strict adherence to the above statements and seek to require same from MXP consultants, and suppliers, including contractors, subcontractors, and vendors.

### 3.0 Relationship with Stakeholders

As to the relationship of MXP’s stakeholders with human rights, the following must be taken into account:

**Personnel:** MXP’s personnel, including employees, temporary or contingent workers, must show strict respect for the human rights recognized under domestic and international law in the conduct of their activities in all countries in which we operate and shall particularly endeavor to ensure compliance with this Policy. All personnel are expected to act as a first line of defense for human rights, reporting any potential impact thereon or any breach of the corporate policies through the established communication and reporting channels.

**Suppliers:** We expect suppliers to respect and uphold internationally recognized human rights. Suppliers are requested to show strict respect for the human rights in the conduct of their activities. In particular, members of the supply chain that are contractors, subcontractors and vendors should : (i) adopt such measures and to avoid all forms or types of forced or compulsory labor and any form of modern slavery within their organization, as well as promote the adoption thereof within their supply chain; (ii) expressly reject the use of child labor in their organization as well as within their supply chain; (iii) respect their workers’ freedom of trade association and right to collective bargaining by their professionals, avoiding all discriminatory practices due to any condition or characteristic in connection with employment and labor; and (iv) set the salaries of their professionals in accordance with applicable law, respecting minimum salaries, overtime and social welfare benefits.

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**Customers:** we request customers to uphold standards and manage their business activities in a way that not only complies with applicable laws but also demonstrates respect for internationally recognized human rights.

MXP likewise respects the human rights of its customers and undertake to provide products and services which, depending on their nature, are safe and respectful with the environment, as well as offer truthful and accurate information on the above. MXP is committed to the right of privacy and freedom of expression.

We seek to protect against unauthorized access, use, destruction, modification, or disclosure of personal information and data and seek to protect the right of privacy and making appropriate use of the personal data submitted by customers. To this end, the MXP has policies, processes, and controls in place to ensure that customer data is managed in an ethical, lawful and responsible way.

**Local and Indigenous Communities:** we respect the rights of people living in the host countries where we conduct businesses. We strive to establish enduring relationships with communities in the area of influence of our projects and assets, based on principles of respect, cultural sensitivity, integrity, responsibility, transparency, good faith and non-discrimination. In doing this, we promote a transparent and proactive engagement with communities, in a timely, honest and culturally sensitive manner.

MXP is firmly committed to protecting the human rights of indigenous communities, in compliance with ILO Convention 169 on Indigenous and Tribal Peoples and the Declaration on the Rights of Indigenous Peoples of the General Assembly of the United Nations. We recognize and respect the identity and unique nature of communities; their cultural diversity; their potentially differing needs and aspirations; and their right to maintain their customs.

We pay special attention to the rights of Vulnerable Groups, with a particular focus on children, national or ethnic minorities, religious and language minorities, people with disabilities, migrant workers and their families. MXP is committed to respecting the rights of women and girls in the communities where it operates.

Furthermore, MXP cooperates in the implementation of initiatives aimed at ensuring autonomous local development that is both lasting and sustainable, as it enables the creation of extensive networks of skills and knowledge, the sharing resources and capabilities, and it works in partnership with communities, local organizations and promoters of development in the government institutions.

## 4.0 Human Rights Due Diligence

MXP strives to appropriately conduct human rights due diligence. This results in a process to:

- Identify and assess potential impacts of our activities on human rights prior to undertaking a new activity or business relationship, and when relevant operational changes occur; integrate the conclusions in MXP internal processes; take appropriate prevention and mitigation measures; and monitor the effectiveness of the measures adopted. All our projects are subject to a human rights impact assessment in line with the requirements of Equator Principles 4 (2020).

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- Conducting due diligence in human rights when establishing business relationships. Make reasonable efforts to prevent or mitigate negative impacts on human rights directly related to operations, products or services provided through our business relationships (which include relations with partners, suppliers, contractors, including private security contractors, as well as any other private or public entities, including public security forces, directly related to our operations, products or services). In the specific case of relationships established with public or private security forces, MXP will act in accordance with the recommendations of the Voluntary Principles on Security and Human Rights.

MXP expects our business relationships to respect human rights when conducting their activities anywhere in the world, and, accordingly, address any negative impacts in which they are involved.

## 5.0 Access to Remedy

MXP provides and facilitate Access to Remedy through our Community Feedback Mechanism and the Ethics Reporting Hotline. We strive to create an open environment where everyone is empowered to raise any conduct that may be unethical, illegal or in violation of this policy, our Code of Conduct or any of our policies and practices.

### 5.1 Ethics Reporting Hotline


We offer the Ethics Reporting Hotline, an anonymous, third-party confidential hotline and secure website that is available to anyone 24/7 to report concerns.

MXP employees and third parties with whom MXP has a business relationship (such as customers, suppliers,) can report concerns and any potential breaches of the Code of Ethics and Business Conduct confidentially and anonymously through the Ethics Reporting Hotline, which is operated by an independent provider and available in 3 countries and 2 languages, 24 hours a day, every day.

MXP is committed to investigating all good faith concerns and will take the actions necessary to resolve and prevent further issues from arising. All relevant reports of unethical business conduct — including any perceived violations or investigations into human rights abuses — are shared with the Board.

### 5.2 Community Feedback Mechanism

Engaging with communities is an important part of our approach to managing Human Rights and providing access to remedy. The community feedback mechanisms ( [Mexico Pacific | Community Feedback \(boreal-is.com\)](#) ) implemented in our projects allow us to receive, track and respond to questions and complaints from community members. Our online Community Feedback Tool provides staff working within communities with real-time information around issues for a quick resolution.

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## 6.0 Disciplinary Action

MXP’s personnel, including employees, and temporary or contingent workers who fail to comply with our Code of Business Conduct and this Policy may be subject to disciplinary action or penalties. Each violation of this Policy shall be reviewed on a case-by-case basis and, where necessary, the appropriate disciplinary and corrective measures shall be applied in accordance with corporate policies and procedures and applicable laws.

## 7.0 Responsibility and Implementation

The Human Resources department, with assistance from the ESG, Legal and Strategic Partnership departments, is responsible for the implementation of this Policy. The Human Resources and Legal departments shall address and clarify any doubts that may arise as to its applicability and enforcement, as well as review its contents at the appropriate intervals and have them updated, as required.

## 8.0 Related policies

Our policies on Code of Business Conduct, Code of Ethics, Equal Employment Opportunity, Anti-Harassment, Sustainability, Open Door Policy, Security and Community Relations also contain MXP’s Human Rights commitments.