

TITLE	APPROVING BODY
Human Rights Policy	Board of Directors
ISSUING BUSINESS UNIT	DATE
CDPQ Global and Sustainability Executive Vice-President Group	2024-04-05

RELATED LEGISLATION, POLICIES AND DIRECTIVES

- Act respecting labour standards
- Code of Ethics
- Workplace Equity, Diversity and Inclusion Policy
- Policy Against Harassment and Other Types of Misconduct
- Policy – Contracts for the Acquisition or Leasing of Goods and Services
- Policy – Sustainable Investing
- Policy on the Principles Governing the Exercise of Voting Rights of Public Companies
- Directive – Protection of Personal Information and Act respecting Access to documents

OBJECTIVES

- Demonstrate CDPQ’s commitment to respecting the rights, dignity and equality of individuals (together, “human rights”).
- Define CDPQ’s principles and priorities for respecting human rights.

1. Background

Caisse de dépôt et placement du Québec (“CDPQ”) recognizes its responsibility to respect universally recognized human rights, including those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the *International Labour Organization Declaration on Fundamental Principles and Rights at Work* (“ILO Declaration”) and the eight ILO fundamental conventions.

CDPQ supports the Protect, Respect and Remedy Framework of the *United Nations Guiding Principles on Business and Human Rights* (“UNGP”). It uses this framework to identify and manage the human rights impacts that it may cause, contribute to, or be directly linked to through its investment activities and operations.

2. Guiding principles

The Human Rights Policy (the “Policy”) reaffirms CDPQ’s commitment to respect human rights. To align its practices with the UNGPs, CDPQ commits to continue carrying out reasonable efforts to:

- Ensure respect for human rights in its investment activities and operations;
- Continue to develop due diligence processes to identify, prevent and mitigate the adverse impacts of its activities on human rights;
- Facilitate access to remedies when a severe human rights violation occurs.

In implementing this Policy, CDPQ will continue to improve its existing procedures. It will focus on various stakeholder groups, mainly employees, suppliers and companies in which it invests.

2.1 Employees

The Code of Ethics, the Policy Against Harassment and Other Types of Misconduct, and the Workplace Equity, Diversity and Inclusion Policy set out the guidelines for CDPQ's commitment to its personnel in relation to the protection of human rights.

For CDPQ, this means:

- Committing to respect the human rights of all of its employees;
- Requiring that all persons be treated without prejudice, discrimination or harassment;
- Encouraging and promoting diversity and working to maintain a culture of inclusion;
- Protecting the privacy of employees by complying with applicable legislation with respect to the protection of personal information;
- Establishing mechanisms for employees and other stakeholders to voice their human rights concerns;
- Facilitating access to remedial measures for employees affected by human rights violations.

2.2 Suppliers

The Policy on Contracts for the Acquisition or Leasing of Goods and Services sets out the guidelines for CDPQ's commitment to respecting human rights in the selection of its suppliers.

For CDPQ, this means:

- Committing to work with suppliers that share its commitment to respecting human rights and adopting responsible environmental, social and governance (ESG) practices;
- Integrating ESG issues, including those related to human rights, into the criteria for calls for tender and into the initial screening and ongoing monitoring process for suppliers;
- Exercising due diligence in selecting its suppliers to ensure that they adhere to CDPQ's applicable principles and policies.

2.3 Investments

CDPQ considers the risks and opportunities related to ESG factors, including those related to human rights, throughout the investment process. The Sustainable Investing Policy sets out the guidelines for CDPQ's commitment to its portfolio companies.

For CDPQ, this means:

- Ensuring the integration of human rights considerations into its investment decisions and shareholder engagement activities with portfolio companies;
- Continuing to develop its ability to identify actual and/or potential adverse human rights impacts resulting from its investment activities;
- Assessing how companies exposed to high-risk sectors or geographic areas prevent and mitigate adverse human rights impacts;
- Seeking to mitigate adverse human rights impacts that are directly related to its investment activities by using shareholder engagement and proxy voting as levers of influence with portfolio companies, when appropriate;
- In cases of severe human rights violations, using our levers of influence, alone or with other shareholders, on a portfolio company in question to facilitate access to remedies for those affected by the actions of said portfolio company and minimize the risk of future violations;
- Working with external managers to integrate ESG factors into their practices and to better understand how they address human rights issues.

3. Governance

3.1 Board of Directors

The Board of Directors approves the Policy and CDPQ's sustainable investing orientations, including on human rights.

3.2 Governance and Ethics Committee

The Governance and Ethics Committee ("GEC") of the Board of Directors supervises sustainable investing work and then submits its observations and recommendations to the Board. It recommends that the Board approve the Policy.

3.3 Executive Committee

The Executive Committee ensures that mechanisms necessary for compliance with the sustainable investing orientations, including human rights, approved by the Board of Directors, are implemented.

3.4 CDPQ Global and Sustainability Executive Vice President group

The CDPQ Global and Sustainability Executive Vice President group establishes CDPQ's human rights orientations by staying abreast of human rights risks, opportunities and issues. It drafts and revises the Policy to take into account the evolution of best practices, and ensures its application, in particular the orientations set out in connection with investments.

4. Reporting

Human rights initiatives are presented during the sustainable investing reporting, notably, once a year to the GEC.

5. Public nature

This policy or any changes made are available on CDPQ's website.

6. Review

This Policy is reviewed at least every three years.