



THE NORTH WEST COMPANY INC.

HUMAN RIGHTS POLICY STATEMENT

JUNE 2022

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GENERAL

The North West Company Inc. and its subsidiaries (collectively, “North West”) are committed to exhibiting the highest standards of business and ethical behaviour. North West’s commitment to such high standards of behavior necessarily includes respecting and supporting the fundamental principles of human rights as set forth in the United Nations’ Universal Declaration of Human Rights and the rights of workers as set forth in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work (collectively, “Human Rights”), and all other applicable international, domestic and local laws and regulations. In line with the United Nations’ Guiding Principles on Business and Human Rights, North West hereby acknowledges and accepts its corporate responsibility to respect, support and safeguard Human Rights and shall demonstrate its ongoing commitment to such efforts through continuous oversight, monitoring and due diligence. Furthermore, North West’s commitment to respect and support Human Rights extends beyond its own workforce. North West expects its business and supply chain partners and its agents and representatives to be similarly committed to safeguarding Human Rights. This expectation is consistent with North West’s goals of providing an enriching, safe and inclusive workplace for its employees and contractors; building deep and lasting relationships with its business and supply chain partners, agents and representatives; preserving and protecting the environment; and supporting the communities which North West has the privilege to serve.

In developing this Human Rights Policy Statement, North West consulted with potentially affected groups in order to ensure that all relevant Human Rights concerns of such affected groups were identified and adequately addressed by North West in this Human Rights Policy Statement.

POLICY OBJECTIVES

The purpose and objective of this Human Rights Policy Statement is to:

1. confirm that North West is committed to meeting its corporate responsibility to respect and support Human Rights;
2. inform North West’s employees/contractors, business and supply chain partners, agents and representatives of North West’s commitment to respect and support Human Rights and clearly state North West’s similar expectations of such persons and entities; and
3. monitor North West’s commitment to respect and support Human Rights through on-going oversight and due diligence.

POLICY SCOPE

This Human Rights Policy Statement applies to the following persons and entities:

1. all North West’s employees and contractors working in any North West store, office or facility;
2. all business and supply chain partners of North West wherever situated; and
3. any other person or entity acting in any capacity on North West’s behalf.

HUMAN RIGHTS COMMITMENTS

1. Equality. North West treats all individuals justly and in a non-discriminatory manner, solely according to their abilities to meet the requirements and standards of their role, in all aspects of employment, including, without limitation, recruitment, compensation and benefits, training, promotion, transfer and termination. North West prohibits discrimination and/or harassment on the basis of any of the following grounds: age, creed, sex, gender identity and gender expression, sexual orientation, family status, marital status, disability, race, ancestry, place of origin, ethnic origin, citizenship, colour, or any association or relationship with a person identified by one of the above grounds.
2. Wage Practices and Employment Practices. North West compensates its employees competitively and operates its business in compliance with all applicable employment standards laws and regulations, including, without limitation, those applicable to minimum wage, hours of work, overtime, vacation and vacation pay, benefits, severance, workers' compensation and employment insurance.
3. Health and Safety. North West believes that every employee/contractor is entitled to work in an environment that is free of unsafe and hazardous work conditions. North West is committed to eliminating the risk of serious harm from all our workplaces in order to keep our employees/contractors healthy and safe. North West shall comply with all applicable occupational health and safety laws and regulations.
4. Maternity Protection. North West believes that women should not suffer any negative consequences in the workplace as a result of pregnancy. Accordingly, North West will not refuse to hire or promote a person because she is pregnant, plans to become pregnant, or recently gave birth; engage in any adverse differential treatment in employment because of pregnancy-related circumstances or conditions; terminate a person's employment due to pregnancy-related conditions or circumstances; create or follow any policies or practices that negatively affect an employee, because of pregnancy-related conditions or circumstances; or fail to provide reasonable accommodation for an employee who is pregnant, trying to become pregnant or recently gave birth.
5. Indigenous Peoples' Rights. North West respects the diversity of indigenous peoples and acknowledges the unique and important interests that indigenous peoples have in the land, waters and environment as well as their unique history, culture and traditional ways. North West engages with indigenous communities and seeks to understand the social, cultural, environmental and economic implications of our business operations, so that it can optimize the benefits which it provides to the local community and can respond to any concerns which may arise.
6. Accessibility for Persons with Disabilities. North West is committed to building an inclusive workplace that values the contributions of people with disabilities. North West is committed to providing an accessible environment in which people with disabilities can work and access all of North West's stores, offices and other facilities. North West is committed to the identification, removal and prevention of accessibility all barriers for its employees/contractors.
7. Collective Bargain and Trade Unions. North West recognizes the rights of employees generally to freely association, to become a member of a trade union and to bargain collectively in accordance with applicable federal, state, provincial or laws.

8. Child Labour. North West is committed to putting and end to child labour and the exploitation of children. North West does not use, or condone the use of, any child labour. North West will not conduct business with any business or supply chain partner that uses or condones the use of child labour.
9. Forced/Bonded/Compulsory Labour. North West has zero tolerance for any form of modern slavery, forced labour and human trafficking, and will ensure our operations and those of our business and supply chain partners are free from these practices.
10. Right to Water. North West recognizes the right to clean water as a fundamental Human Right and will ensure that our operations preserve the quality of the water resources in the communities in which we do business, that our use of water will not diminish the availability of community water resources to the individuals or the communities in the areas in which we operate and our operations will not adversely impact physical accessibility of community members to community water resources and will address community concerns in a cooperative manner

TRAINING

North West Human Resources shall periodically provide appropriate training to all of its employees and contractors on North West's commitment to Human Rights to raise awareness and foster compliance with this Human Rights Policy Statement.

IMPLEMENTATION

In order to implement and give effect to this Human Rights Policy Statement and the principles regarding the safeguarding of Human Rights set forth herein, North West shall:

1. assess, on an ongoing basis, potential adverse human rights impacts, the severity of the potential impact, and the relevant processes in place;
2. undertake, on an ongoing basis, meaningful consultations with potentially affected groups in order to ensure that all relevant Human Rights concerns of such affected groups continue to be identified and adequately addressed by North West in this Human Rights Policy Statement;
3. integrate relevant findings into policies and procedures, based upon the assessment;
4. provide Human Rights training to all relevant internal stakeholders;
5. track progress as part of our efforts to continuously improve;
6. communicate with relevant internal and external stakeholders to help shape and inform North West's work and priorities; and
7. adjust our human rights priorities, as needed.

AUDIT

North West's business and supply chain partners of wherever situated must maintain accurate records to demonstrate compliance with this Human Rights Policy Statement. North West reserves the right to conduct an appropriate audit of all of its business and supply chain partners to ensure compliance with this Human Rights Policy Statements. All North West's business and supply chain partners must cooperate with any North West or third party audits or investigations into violations or suspected violations of this Human Rights Policy Statement.

REPORTING

North West expects any stakeholder who believes that someone is violating this Human Rights Policy Statement or any applicable laws to report such violation through either of the following channels:

Human Resources

corporatehumanresources@northwest.ca
(204) 934-1524

Legal

legal@northwest.ca
(204) 934-1756

REFERENCES

Universal Declaration of Human Rights

https://www.ohchr.org/sites/default/files/UDHR/Documents/UDHR_Translations/eng.pdf

International Labour Organisation's Declaration on Fundamental Principles and Rights at Work:

<https://www.ilo.org/declaration/lang--en/index.htm>

United Nations' Guiding Principles on Business and Human Rights

https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf