



COUNTY OF NORTHERN LIGHTS

POLICY

HUMAN RIGHTS

CREATED: 2/9/2025

REVISED:

TOTAL PAGES: 2

PURPOSE

The purpose of this procedure is to establish guidelines for human rights.

SCOPE

This document is applicable to all employees.

GUIDELINES

Operations Conducted in Accordance with Regional Human Rights Laws

County of Northern Lights operations are conducted in accordance with regional Human Rights Laws. This protocol is based on industry best practice from the United National Global Compact (UNGC) Principles, United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and ISO 26000 Guidance on Social Responsibility. It is encouraged to review these industry best practice documents, as well as any applicable regional laws or legislation surrounding County of Northern Lights approach and/or requirement for addressing Human Rights Protections within our business operations and supply chain.

County of Northern Lights must ensure that its operations are consistent with the legal principles applicable in the country of operation. If national law falls short of international standards, County of Northern Lights should strive to meet international standards and not infringe on Human Rights. County of Northern Lights has a responsibility to respect Human Rights whether they are operating in an area of weak or strong governance.

Process to Address Human Rights Concerns

County of Northern Lights should have a remediation process in place to address Human Rights concerns. This allows County of Northern Lights to address adverse Human Rights impacts that it has caused or contributed to. Effective County of Northern Lights grievance mechanisms ensure that employees, contractors, local community members and others can raise their concerns and have them be considered. This can help County of Northern Lights to identify risks of negative impacts and avoid escalation of disputes.

Tracking Human Rights Impacts and Performance

County of Northern Lights has a process for tracking Human Rights impacts and performance. A process is in place to report any perceived Human Rights impacts to County of Northern Lights management. Tracking and reporting processes allow County of Northern Lights to monitor Human Rights performance. The procedures may vary across sectors and even among departments, but regular reviews of Human Rights impacts and performance are crucial. Tracking generates information needed to create appropriate incentives and disincentives for employees, ensure continuous improvement and to make necessary adjustments in priorities and approaches. Tracking should draw on feedback from both internal and external stakeholders.

Monitoring Subcontractors/Suppliers

County of Northern Lights has a process for monitoring subcontractor and/or supplier Human Rights risks. Effective management of Human Rights risks and potential abuses must include consideration to activities conducted by subcontractors or suppliers that are under contract with County of Northern Lights.



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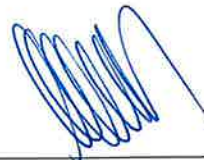
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Process to Avoid Being Complicit in Human Rights Abuses

Ways to avoid complicity in Human Rights abuses could include:

1. Privately and publicly condemning systematic and continuous Human Rights abuses
2. Continuous consultation within and outside County of Northern Lights with relevant stakeholders as part of a Human Rights due diligence process
3. Identifying functions within County of Northern Lights that are most at risk of becoming linked to Human Rights abuses, possibly even at the project exploration and planning stage, and where there might be opportunities to advance Human Rights
4. Conducting a Human Rights impact assessment consisting of an analysis of the functions of a proposed investment and the possible Human Rights impacts (intended and unintended) they may have on the community or region.



Chief Elected Official

Chief Administrative Officer