



Human Rights Policy

Approved by: President & CEO

Effective: January 9, 2025

1.0 OBJECTIVE

This Human Rights Policy ("Policy") provides a framework to support Canadian Pacific Kansas City Limited and its subsidiaries' (collectively, "CPKC") commitment to respect the universal human rights of all people throughout our operations. This Policy outlines our strategy to uphold and monitor human rights across CPKC's network and operations by maintaining 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 CPKC's values. We recognize that all people have a right to be treated with dignity and without discrimination in accordance with applicable laws in those jurisdictions in which CPKC operates. As a leading North American transportation service provider, this recognition is central to our business and corporate values and is embodied in our Code of Business Ethics and Supplier Code of Conduct. This recognition applies across our value chain, and CPKC expects the same from its employees and those with whom it does business.

3.0 SCOPE

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

4.0 COMMITMENTS

CPKC respects the fundamental human rights of individuals or groups directly involved in or affected by our operations. The commitments reflected in this Policy are informed by the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

CPKC abides by all applicable human rights-related legal requirements in the jurisdictions in which we operate. Our human rights commitments address our operations and extend to Suppliers in accordance with our Supplier Code of Conduct. Our employment policies, procedures and practices reflect the accepted labour standards and related non-discrimination principles in CPKC's respective jurisdictions.

In accordance with this Policy, CPKC commits to:

1. Maintain a Respectful and Inclusive Workplace

- Provide and maintain a work environment that supports and protects the rights and dignity of all individuals, whatever their identified individual characteristics.
- Promote employment equity, inclusivity and diversity across our workforce.
- Maintain a workplace that is free from all forms of unlawful harassment, discrimination, violence, or retaliation. Such conduct is not tolerated at any level within the organization.
- Promote CPKC Personnel's well-being by providing competitive compensation and benefits, as well as seeking to provide hours of work that meet or exceed legal standards.
- Respect employees' right to collective bargaining and freedom of association.

2. Provide a Safe and Healthy Work Environment

- Protect the physical and mental health of CPKC Personnel through safe work practices and employee and family assistance programs, provision of necessary personal protective equipment and safe, clean and healthy work environments (and where relevant, living conditions) that meet or exceed legal standards, and by maintaining occupational health and safety practices in support of this commitment.
- Protect the safety of contractors and Suppliers doing business on CPKC property by observing safety standards and guidelines.
- Protect the safety and security of our operations and CPKC Personnel while respecting fundamental human rights, including in any necessary interactions between members of the public, CPKC Police Services and contracted private security providers.

3. Meaningful Engagement with Communities

- Respect the diverse cultures, customs, perspectives and values of the communities in which CPKC operates, including Indigenous peoples.
- Engage key stakeholders—including communities, Indigenous peoples, Suppliers and customers—to understand and discuss human rights concerns.

4. Respect Human Rights within our Supply Chain

- Prohibit the use of any form of modern slavery, which includes compulsory or forced labour, child labour, human trafficking, sexual exploitation, corporal punishment, inhumane treatment or any other forms of modern slavery in CPKC's operations.
- Maintain and communicate CPKC's expectations of our Suppliers for upholding the same standard and implementing practices for the prevention of the use of any forms of modern slavery in their operations and supply chain.

5.0 IMPLEMENTATION

Implementation of this Policy is led by the Senior Vice-President & Chief Human Resources Officer with support from relevant CPKC business groups. All CPKC Personnel are responsible for implementing this Policy in their work and the processes they oversee.

CPKC will provide ongoing leadership and resources to embed the above principles into our corporate culture and business practices. We will continue to develop, implement and review supporting procedures, communication and training practices to enable alignment, consistency and effective governance of this Policy.

6.0 MONITORING AND REPORTING

CPKC maintains processes for monitoring and reporting performance and compliance with this Policy, including periodic reporting to CPKC's Executive Leadership Team and the Risk and Sustainability Committee of the Board of Directors.

- Aspects of human rights performance are communicated through CPKC's annual reports, sustainability reports, website, and other public disclosures.
- CPKC's Personnel are obligated to report known or suspected issues of non-alignment with this Policy to their supervisor as soon as possible.
- CPKC maintains publicly accessible mechanisms for all stakeholders to report human rights related concerns or non-compliances via Community Connect – our community engagement platform – to a specific CPKC team via our website Contact Us page or through our confidential, anonymous and independently managed Ethics Line by telephone at 1-888-279-6235 in Canada and the United States, and +52 800 777 0424 in Mexico, or by filing a report at <https://secure.ethicspoint.com/domain/media/en/gui/22547/index.html>.

7.0 SUPPORTING POLICIES

CPKC's commitment to respecting human rights is supported by other policies, including:

- Code of Business Ethics
- Business Ethics Reporting Policy
- Safety Policy
- Privacy Policy
- Environmental Policy
- Supplier Code of Conduct

History

Version	Description	Date
1.0		July 27, 2020
2.0	Updates for Name Changes and Other Amendments	January 9, 2025