



Renewable Energy.  
Sustainable Development.

# Safeguard and Promotion of Human Rights Policy

**Innergex Renewable Energy Inc.**

## SAFEGUARD AND PROMOTION OF HUMAN RIGHTS POLICY

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This policy outlines Innergex's expectations regarding adherence to applicable laws and internationally recognized frameworks that promote the rights and freedoms of all people. Innergex's commitment is to conduct business in a responsible manner, in-line with its core values, while promoting basic and fundamental human rights.

### PURPOSE

This policy articulates Innergex's (including Innergex Renewable Energy Inc. and all of its affiliates) commitment to the promotion and integration of human rights considerations in all aspects of its business, including its procurement, decision-making, management and operations.

Innergex requires that all Innergex team members comply with the requirements of this policy. No violation of human rights will be tolerated by or within Innergex.

### SCOPE

The principles and guidelines contained in this policy form part of the requirements contained in other Innergex policies, including its [Code of Conduct](#). As such, this policy covers each employee and director of Innergex, as well as third parties acting for or on its behalf (each an "**Innergex team member**" or collectively the "**Innergex team members**") and the communities that host its facilities. For clarity, Innergex team members include consultants, contractors, suppliers, agents, sponsors, joint venture partners and advisors (each a "**Representative**" or collectively the "**Representatives**").

This policy will be applied jointly with all Innergex policies, including the Innergex [Code of Conduct](#) and [Whistle-Blowing Policy](#).

### PRINCIPLES

As part of its corporate policies and its [Code of Conduct](#), Innergex has a list of key principles to further promote international human rights including:

1. Our commitment to comply with applicable laws extends to the respect of all fundamental human rights, regardless of the jurisdiction where Innergex does business.
2. Our support for the human rights principles contained within:
  - a. The Universal Declaration of Human Rights;
  - b. The International Covenant on Civil and Political Rights;
  - c. The International Covenant on Economic, Social and Cultural Rights (the “**ICESCR**”);
  - d. The International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work; and
  - e. The UN Declaration on the Rights of Indigenous Peoples (UNDRIP).
3. Our respect for each individual’s human rights and will not discriminate on the basis of age, gender identity, sexual orientation, political affiliation, disability, nationality, religion, family situation or other factors, in accordance with applicable legislation, and believe in the importance of protecting the human rights of individuals belonging to specific groups or minorities, where they may be unlawfully and adversely affected.
4. Our belief in fostering a work environment free from threats, harassment, violence or bullying of any sort and where all are treated with dignity and respect, where all are awarded no less than a fair and adequate minimum living wage, and where working hours and conditions comply with applicable laws and international human rights and labour standards.
5. Our respect for employees’ right to freedom of association.
6. The promotion of the abolition of child labour (as defined in paragraph 3 of Article 10 of the ICESCR) and the elimination of all forms of forced or compulsory labour, human trafficking and slavery and the steps to ensure that they do not exist in our operations and supply chains.
7. Our belief in long-term sustainable development that balances social, environmental, and economic imperatives and that the respect of human rights forms a part of such balance.
8. Our belief in building and maintaining lasting relations with our employees, our partners, and our external stakeholders built on respect, transparency, and integrity.
9. The payment of equitable and fair wages to that allow employees to meet their basic needs.

Innergex shares this policy and outlines our expectations on adhering to these principles with external stakeholders including suppliers, contractors and other third parties. Human rights expectations are also reflected in other Innergex policies including the [Code of Conduct](#), the [Whistle-Blowing](#) policy, the Supplier Code of Conduct, and the [Workplace Environment Free of Harassment, Violence and Bullying](#) policy.

## **DOING BUSINESS WITH REPRESENTATIVES**

In some cases, Innergex may be held responsible for violations of human rights committed by third party Representatives who act for and on behalf of Innergex in the conduct of business dealings. The commitments and principles set out in this statement apply to the conduct of such Representatives, regardless of the geographical location where they operate. In addition, to protect Innergex's reputation as a good corporate citizen, Innergex team members are required to perform commercially reasonable due diligence when selecting or entering into an agreement with Representatives.

As part of their due diligence, Innergex team members are encouraged to reasonably investigate the following aspects of each Representative:

1. the jurisdictions and industries where they conduct business or source their supply chain;
2. their reputation;
3. their past behaviour;
4. their policies and code of conduct;
5. their personal and business connections;
6. transparency on human rights matters and on the identity of their officers, directors and shareholders; and
7. any other available information on violations of human rights.

Such information may be found in registries, court decisions, or reported allegations.

Innergex team members should further monitor and periodically assess the compliance and performance of its Representatives, with respect to human rights and labour conditions. If an Innergex team member becomes aware of an area where a Representative could improve its performance in the area of human rights, it should notify the Representative in question and reasonably assist such Representative in improving its performance.

As part of Innergex's efforts to promote human rights, when entering into an agreement for the supply of goods or services, Innergex team members are required to obtain a commitment to comply with the terms of this policy, as well as the Supplier Code of Conduct from their Representatives.

## WHAT TO DO IN THE EVENT OF A VIOLATION OF HUMAN RIGHTS

Innergex team members shall not deliberately ignore or “turn a blind eye” to facts that may give rise to a suspicion of violation of fundamental human rights. If an employee becomes aware of any event which may constitute a breach of such requirements on any individual, workers, or communities or which could compromise Innergex’s ability to comply with applicable laws, Innergex team members are bound to immediately seek guidance from the Legal Department or contact the Innergex EthicsLine. Reports made on the Innergex EthicsLine may be made anonymously. The Innergex EthicsLine is operated by an independent service provider available 24 hours a day, seven days a week. They have operators who will be able to answer your call and document the report in French, English or Spanish. The report is then forwarded to the Chief Human Resources Officer and Chief Legal Officer and Secretary, in order to ensure a follow-up, an investigation is conducted, and appropriate remediation is carried out.

This service is available to all employees, partners, suppliers, and community stakeholders.

EthicsLine can be reached at:

**Within Canada or the USA:** 1 844 809-9450

**In France:** +44 20 8939 1650

**In Chile:**

1. From an outside line dial the direct access number for your location:

Chile (Telmex) - 800) 800-225-288

Chile (Telefonica) 800-800-288

Chile (ENTEL) 800-360-312

2. At the English prompt dial: 844 809-9450

Or follow this link: [www.innergex.ethicspoint.com](http://www.innergex.ethicspoint.com)

For additional information on investigation procedures and disciplinary measures, arising from a breach of the commitment and principles in this policy, please refer to Innergex’s policies and to the Innergex [Code of Conduct](#).

## GOVERNANCE OF THIS POLICY

The Corporate Governance Committee oversees the implementation, monitoring, and approval of the Safeguard and Promotion of Human Rights policy at Innergex.