



GLOBAL HUMAN RIGHTS POLICY

PURPOSE

Pan American Silver Corp. (“Pan American”) is committed to respecting the human rights of all individuals and communities and respecting the laws of the countries where Pan American operates. Pan American will foster a positive human rights culture within our organization and strive to prevent or mitigate any adverse impact of our activities on our employees, communities and external stakeholders. Our commitment is reflected in our relationships with the communities where we operate and how we interact with all stakeholders.

This **Global Human Rights Policy** consolidates our existing commitments to respect human rights and is intended to provide guidance on the standards of conduct that must be followed by our directors, officers, and employees.

COMMITMENTS & APPLICABLE STANDARDS

We are guided by the following commitments and standards of conduct.

Pan American will:

- a. comply with applicable laws, rules, and regulations in the countries and regions where we operate, and respect applicable internationally recognized human rights laws and standards;
- b. respect the United Nations’ *Guiding Principles on Business and Human Rights (UNGPs)*, the *Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development*, and the *Voluntary Principles on Security and Human Rights*;
- c. reflect human rights laws and standards in the operational policies and procedures of Pan American;
- d. conduct reasonable ongoing human rights due diligence to identify, prevent, mitigate and account for actual or potential adverse impacts or risks on human rights;
- e. seek to avoid or minimize causing or contributing to adverse human rights impacts through our activities, to address such impacts if they occur, and to engage in processes to mitigate those impacts;
- f. maintain operational-level grievance mechanisms to address any adverse impacts on human rights;
- g. provide a safe and healthy workplace that is free from violence, harassment, intimidation, and discrimination on the basis of race, colour, creed, age, gender, language, national or social origin, marital status, sexual orientation, disability, religious, political or other opinion, or union affiliation;
- h. not engage in forced, indentured or child¹ labour;
- i. respect the rights to freedom of association and collective bargaining;
- j. protect the environment, use water responsibly and encourage adoption & use of technologies towards reducing emissions that could contribute to climate change;
- k. recognize and respect cultural values, beliefs and traditions of people in the countries and communities in which we operate and the rights of indigenous peoples;

¹ The Mining Association of Canada, of which the Company is a member, has committed to ILO 138. ILO 138 requires that the minimum age for mining and quarrying shall not be less than 18 years.



- l. engage in meaningful dialogue, promote participation and foster inclusion with potentially affected groups and other stakeholders;
- m. conduct land acquisitions in an appropriate and timely manner to ensure that physical and economic displacement impacts on affected people, if any, are avoided or minimized where possible, and appropriately mitigated when they occur in a manner that fosters trust and mutual respect;
- n. act with transparency and avoid knowingly being complicit in activities that cause, or are likely to cause, adverse human rights impacts;
- o. expect contractors and third parties acting on our behalf to act in a manner consistent with this *Human Rights Policy*; and
- p. respect and not interfere with anyone who acts to promote or protect human rights through peaceful and lawful means.

APPLICATION

This Policy applies to Pan American and all of its directors, officers and employees, and to any third parties, such as contractors, consultants, suppliers, intermediaries, agents, or other business partners who are acting on behalf of or representing Pan American.