

HUMAN RIGHTS POLICY STATEMENT

Scope & Purpose

MEG has adopted a *Business Conduct Charter* which sets out key principles shared by MEG and its stakeholders and representatives in conducting business ethically. In support of the *Business Conduct Charter*, MEG has developed this *Human Rights Policy Statement* to ensure MEG and MEG's suppliers and service providers uphold and respect human rights as reflected in the UN Universal Declaration of Human Rights and the Canadian Charter of Rights and Freedoms in their business practices. In implementing this Policy, MEG will comply with all laws, regulations, rules and standards concerning respect for human rights of each country in which the Corporation conducts business.

Application

This Policy applies to MEG and its affiliates, directors, officers, employees and contractors. In addition, while MEG recognizes that it is the responsibility of its suppliers and service providers to define their own policy and approach to the issue of human rights, MEG expects that all of its suppliers and service providers conduct their business practices in accordance with MEG's values and requires that suppliers and service providers agree, in their contractual arrangements with MEG, to abide by MEG's *Business Conduct Charter* and this *Human Rights Policy Statement*.

This Policy is developed by MEG's management and reviewed by the MEG's Board of Directors.

MEG's Human Rights Commitments

MEG is committed to ensuring human rights are respected in the conduct of all its activities, including:

- Prohibiting discrimination of minorities, whether based on gender, race, or other minority status, in respect of employment and occupation;
- Prohibiting child labour, forced, involuntary, compulsory or slave labour, or modern slavery practices;
- Respecting the fundamental freedoms of all individuals, including the freedom of thought, belief, opinion and expression, the freedom of peaceful assembly, the freedom of association and collective bargaining, and other rights and freedoms enshrined in the UN Universal Declaration of Human Rights and the Canadian Charter of Rights and Freedoms;
- Ensuring safe working conditions for all employees and contractors in accordance with applicable laws and best industry practices; and
- Ensuring security policies and guidelines are consistent with applicable laws and best industry practices.

Ensuring Compliance with Our Human Rights Commitments

MEG uses several strategies and processes to ensure awareness, training and compliance with the human rights commitments made in this Policy, including:

- providing a copy of its *Business Conduct Charter* and this *Human Rights Policy Statement* to all new employees and contractors;
- making all policies, including this Policy, readily available to employees on its internal website;
- monitoring compliance by annually requiring employees and contractors to: (i) acknowledge their own compliance with all policies, including this Policy; and (ii) affirm they are not aware of non-compliance by others;
- ensuring ready access for employees and contractors to anonymous and secure communication and reporting channels that allow them to safely notify MEG of actual or potential impacts on human rights, including MEG's Confidence Line;
- regularly review and assess its human rights policies, practices and procedures;
- consult with its stakeholders regarding human rights and other social issues; and
- selecting suppliers and service providers, through appropriate due diligence, who are reputable and do not have a history of violation of human rights.

Review

This Policy will be reviewed by the Governance and Nominating Committee of the Board every three years or, where circumstances warrant, at such shorter interval as necessary, to determine if further additions, deletions or other amendments are required.

Adopted by the Board on May 4, 2020.

Last reviewed and approved by the Governance and Nominating Committee on April 23, 2020.