



GLOBAL HUMAN RIGHTS POLICY

PURPOSE

Pan American Silver Corp. (“Pan American”) and its subsidiaries are committed to respecting the human rights of all individuals and communities connected to our activities and supply chain. This commitment applies to every stage of our operations- from exploration and development, to production, closure and post-closure activities - and includes our employees, supplier and local community members.

We commit to respect human rights through our policies and take action to prevent, mitigate, and where appropriate, remediate any adverse impacts linked to our business, either through our activities or our business relationships. We also believe that developing a positive human rights culture is important within our organization and will encourage diversity of thought, including consideration from a human rights perspective, in the way we do business.

COMMITMENTS & APPLICABLE STANDARDS

We are guided by the following commitments and standards of conduct. Pan American will:

- a. Comply with all applicable laws, rules, and regulations in the countries and regions where we operate.
- b. Respect all internationally recognized human rights, including those established in the Universal Declaration of Human Rights, and be guided by the United Nations’ Guiding Principles on Business and Human Rights (UNGPs), the Voluntary Principles on Security and Human Rights, the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and the Guidelines for Multinational Enterprises on Responsible Business Conduct of the Organization for Economic Co-operation and Development.
- c. Reflect human rights laws and standards in our operational policies and procedures.
- d. Commit to avoid causing or contributing to adverse human rights impacts, to address such impacts if they occur and to engage in processes to mitigate them.
- e. Conduct ongoing human rights due diligence at all our operations and in our supply chain to identify, prevent, mitigate, and resolve for actual or potential adverse human rights impacts.
- f. Maintain effective grievance mechanisms to address potential adverse human rights impacts, ensure confidentiality and anonymity for complainants and whistleblowers, and enforce no-retaliation policies for those who raise grievances.
- g. Provide a safe and healthy workplace free from violence, harassment, intimidation, and discrimination based on race, colour, creed, age, gender, language, national or social origin, marital status, sexual orientation, disability, religion, political, other opinion, or union affiliation.
- h. Implement policies which improve the workplace and engage with employees, contractors and suppliers to respect human rights.
- i. Promote gender equality by identifying and addressing systemic barriers to full participation in the workforce and pay inequality. Foster an inclusive, safe and respectful workplace for individuals of all gender identities and expressions. Promptly address any allegations of harassment and discriminatory treatment.
- j. Promote the inclusion and protection of all individuals by fostering a culture of dignity, safety, respect, plurality and equal opportunity for all employees, regardless of gender identity or expression.



- k. Not engage in forced, bonded, indentured or child labour in any of our operations. We expect our suppliers to uphold labour standards consistent with our own to prevent exploitative labour practices in their operations and our supply chains.
- l. Respect the rights to freedom of association and collective bargaining.
- m. Protect the environment and respect the right to a clean, healthy and sustainable environment by using water and other resources responsibly, reducing emissions, and promoting technologies that address climate change, while demonstrating environmental stewardship.
- n. Respect the rights of Indigenous Peoples. Recognize and respect physical and intangible cultural heritage, cultural values, beliefs and traditions of people in the communities and countries in which we operate.
- o. Engage in good faith and meaningful dialogue, promote participation and foster inclusion with potentially affected stakeholders, including vulnerable groups.
- p. Communicate with stakeholders in a transparent, clear, and honest manner, respecting cultural values.
- q. Conduct land acquisitions consistent with international practices, avoiding and minimizing physical, and economic displacement, mitigating adverse impacts, and fostering trust and mutual respect with affected communities.
- r. Act with transparency and avoid knowingly being complicit in activities that cause, or are likely to cause, adverse human rights impacts.
- s. Expect our suppliers and contractors acting on our behalf to act in a manner consistent with this Global Human Rights Policy.
- t. Respect and not interfere with anyone who acts to promote or protect human rights through peaceful and lawful means.
- u. Respect human rights when using new tools and high-impact algorithmic technologies, including Artificial Intelligence applications and other emerging technologies.
- v. Acknowledge mining's potential long-term impacts and commit to environmental stewardship by using responsible mine-closure procedures, including land rehabilitation, and post-closure monitoring.
- w. Support socio-economic activities to build community resilience after mine closure.
- x. Provide human rights information and training so that employees and suppliers can better understand and uphold human rights principles and comply with this Global Human Rights Policy.

APPLICATION

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 all our leaders, employees, suppliers, business partners and for other persons who act on behalf of Pan American. This Policy forms part of Pan American's integrated governance framework and must be read together with our Environmental Policy, Global Anti-Corruption Policy, Global Code of Ethical Conduct, Health and Safety Policy, Social Sustainability Policy and our Supplier Code of Conduct.