



## HUMAN RIGHTS POLICY

### A MESSAGE FROM THE PRESIDENT AND CEO

*“At CN, we recognize the fundamental importance of human dignity and equality. We believe that economic growth and social progress go hand in hand and as such, we strive to provide a workplace that reflects these values and offers a safe, inclusive and respectful environment for everyone. This is not only critical to the sustainability of our operations and the well-being of our workforce, it is also the right thing to do.”*



**Tracy Robinson,**  
President and CEO

### ABOUT OUR HUMAN RIGHTS POLICY

Canadian National Railway Company (“CN”) is focused on operating in a socially responsible way that respects human rights and manages human rights impacts in its operations and supply chain. In developing this Human Rights Policy (“Policy”), CN drew upon international standards and best practices in the area of human rights, including the Declaration on Fundamental Principles & Rights at Work by the International Labour Organization (“ILO”), the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights<sup>1</sup>; and the United Nations Guiding Principles on Business and Human Rights (UNGPs). CN is a participant in the United Nations Global Compact (the “UNGC”) and recognizes our commitment to the principles of the UNGC and committed to respecting the UNGPs.

By stimulating the engagement of its employees and other stakeholders and raising awareness of the rights protected under this Policy, CN wishes to ensure the respect of human rights in the workplace as well as in our communities.

This Policy sets out the broad principles to which CN commits, in order to support the recognition of human rights. The Policy shouldn’t be construed as an attempt to add, subtract or depart from any legal, regulatory or contractual obligation that applies to CN’s operations. This policy applies to all employees in Canada and in the U.S. We expect every third party we do business with, including consultants, agents, suppliers and business partners, to obey the law and adhere to high ethical standards, including respecting human rights.

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<sup>1</sup> The Universal Declaration of Human Rights and the two Covenants are commonly referred to collectively as the International Bill of Human Rights.

## **OUR APPROACH**

### **A SAFE AND HEALTHY WORKPLACE**

At CN, nothing is more important than safety. We aim to be the safest railroad in North America by establishing an uncompromising safety culture and implementing a management system designed to minimize risk and drive continuous improvement. Leading best practices and regulatory standards inform our actions in order to achieve this goal.

### **THE ADVANTAGES OF A DIVERSE WORKPLACE**

Inclusivity and respect are principles of major importance at CN. We celebrate the diverse make-up of our workforce, not only because of the fundamental importance of the right to equality, but also because diversity constitutes one of the strengths of our company. It contributes to our ability to innovate and reflect the wide range of our customers and communities where we operate, thus ensuring CN's competitiveness. Fundamentally, the right to be different preserves the richness of human diversity and contributes to the well-being of our communities.

### **PROTECTION AGAINST DISCRIMINATION AND HARASSMENT**

CN is committed to providing a non-discriminatory, harassment-free work environment. This commitment extends to our dealings with suppliers and contractors.

Discrimination can deeply affect the dignity of a human being and is strictly prohibited. Discrimination means a distinction, exclusion or preference made on the basis of the personal characteristics of an individual, such as age, race, colour, religion, gender, national or ethnic origin, sexual orientation, gender identity or inter-sex status, disability, marital or family status, pregnancy, pardoned conviction, veteran status or any other characteristic protected by law, with no bearing on his or her professional duties.

At CN, harassment is considered employee misconduct and is not tolerated. Harassment means any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an individual. It creates an intimidating, hostile or offensive atmosphere that prevents our employees from thriving. The right to protection from harassment includes protection from sexual harassment, being any conduct, comment, gesture or contact of a sexual nature that might, on reasonable grounds, be perceived as placing a condition of a sexual nature on employment or on any opportunity for training or promotion.

For more information, employees can consult the Workplace Harassment and Violence Prevention Policy (Canada), the Prohibited Harassment, Discrimination and Anti-Retaliation Policy (U.S.), and the Workplace Violence Prevention Policy (U.S.).

### **PROHIBITION OF FORCED LABOUR AND CHILD LABOUR**

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. We also prohibit the use of corporal punishment, threats of violence or forms of mental or physical coercion. Workers must not be required, as a condition of employment, to make a deposit of, or surrender

any government-issued identification, passports, work permits or any other documents necessary for free movement and termination of employment.

Employment of individuals below the minimum age permitted by local law is strictly prohibited.

### **WORK HOURS, WAGES AND BENEFITS**

CN seeks to offer competitive work conditions to its employees, in conformity with the applicable requirements under local law, including individual or collective employment agreements. Fundamental standards such as minimum wage, maximum amount of work hours, mandatory holidays and progressive remuneration in case of overtime, are some of our many concerns to support an engaged workforce.

### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Workers' associations and unions play a key role in ensuring that our employees' voices are heard at all levels of the company. We respect this fundamental right for which employees should never fear retaliation. CN is committed to maintaining a strong and consistent engagement with those that represent its employees and recognizes that this dialogue is essential to ensure fair work conditions.

### **ENGAGEMENT WITH OUR COMMUNITIES AND EMPOWERING INDIGENOUS GROUPS**

CN is aware that its operations may have broad-ranging impacts on communities. Meaningful engagement is essential to our efforts to further the respect for human rights. We strive to support local communities, including Indigenous communities and disadvantaged groups and areas, by maintaining open communications and being responsive to feedback. Our Indigenous vision and Indigenous Relations Policy are focused on building positive and sustainable relationships with Indigenous peoples across the CN network and we will support activities and efforts that can improve the impact that CN has on the well-being of our communities.

### **MONITORING, REPORTING AND REMEDIATION**

Compliance with this Policy will be monitored in accordance with the applicable internal assessment mechanisms and periodically reviewed by CN. CN may commission external audits by independent third parties where required. CN intends to publicly report on its performance under this Human Rights Policy in its Sustainability Report available on the CN website at <https://www.cn.ca/en/delivering-responsibly>.

Anyone who becomes aware of a violation or suspected violation of this Policy is strongly encouraged to speak up. CN prohibits retaliation against any person for reporting, in good faith, contraventions of this Policy, or for filing a complaint or testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a government enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit because an employee has reported alleged prohibited conduct or participated in an investigation. In alignment with the UNGPs, where we identify that our business activities have caused or directly contributed to an adverse human rights impact, we would work to address such impacts through appropriate processes. If the impact is due to actions by our suppliers, we will seek to work with them to mitigate and remediate the impact.

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|                          | Tel: <b>1-800-925-5974</b> or online at <a href="http://www.reportanissue.com">www.reportanissue.com</a>                   |
| <b>CN's Ombudsman</b>    | Tel : <b>1-866-226-8968</b> E-mail: <a href="mailto:ombudsman@cn.ca">ombudsman@cn.ca</a>                                   |
|                          | <i>The Office of the Ombudsman has a confidential voicemail available 24 hours a day on which you can leave a message.</i> |
| <b>CN Law Department</b> | Tel: <b>1-866-996-6627</b>   |

**TRAINING**

We seek opportunities to work with our employees, contractors and suppliers to develop and participate in awareness raising, knowledge-sharing and training, increasing our shared understanding of human rights and improving our collective performance.

**NO THIRD PARTY BENEFICIARY RIGHTS**

This Policy does not create any third-party beneficiary rights.

Effective date: July 29, 2020, amended October 30, 2024

