

Human Rights Policy

SECTION 1 – GREENSHIELD’S COMMITMENT TO HUMAN RIGHTS

GreenShield is committed to respecting internationally recognized human rights in its business activities and relationships. In pursuit of its mission of Better Health for All, GreenShield recognizes the importance of taking steps to identify and address any actual or potential adverse human rights impacts that it may cause or contribute to causing through its operations or value chain.

GreenShield recognizes the role of governments in protecting human rights. GreenShield abides by Canadian legal and regulatory requirements and reinforces the expectation that stakeholders across its operations and value chain meet those requirements.

In implementing this commitment, GreenShield is guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Rights, including the Universal Declaration of Human Rights, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

SECTION 2 – SCOPE

This policy applies to Green Shield Holdings Inc. and its subsidiaries.

Its scope covers GreenShield’s own operations and value chain. For the purposes of this Policy, GreenShield’s operations refer to all GreenShield business activities conducted by employees, officers, and directors. Value chain refers to the entities involved in bringing GreenShield’s products and services from conception to end use.

SECTION 3 – HOW GREENSHIELD IDENTIFIES AND ASSESS IMPACTS

GreenShield identifies and assesses human rights risks and impacts through multiple processes, including internal reporting by employees and leaders, risk and compliance activities, procurement and supplier due diligence, client and community feedback, and complaints channels. All employees, directors, and officers are required to comply with GreenShield’s Code of Conduct and to acknowledge it annually.

Concerns related to this Policy are logged, assessed, prioritized, and escalated based on severity and likelihood, materiality to operations or value chain, GreenShield’s level of control or influence, and potential impact on vulnerable populations. Concerns may be subject to additional scrutiny where, for example, they relate to higher-risk geographies or sectors, involve vulnerable groups, show patterns or recurring issues, arise from significant suppliers or strategic business partners, or coincide with major changes to products, services, operations, or sourcing.

GreenShield’s approach is risk-based and proportionate, with attention given to the severity of potential impacts, the organization’s level of control or influence, and the potential effects on vulnerable populations.

SECTION 4 – REMEDIATION AND LEVERAGE

Where GreenShield determines that it has caused or contributed to a negative human rights impact through its operations, it will take appropriate action to remediate that negative impact, mitigate the risk of ongoing harm, and prevent recurrence of similar impacts.

GreenShield intends to work with suppliers and partners that respect human rights. GreenShield’s approach to its value chain is risk-based and proportionate. While GreenShield cannot directly control the conduct of entities across



its broader value chain, it seeks to use its influence to encourage responsible practices and appropriate responses to identified human rights concerns.

Where GreenShield assesses that a negative human rights impact is directly linked to its value chain, GreenShield will assess whether and how it can reasonably exercise its influence to encourage the responsible entity to prevent, mitigate, and, where appropriate, remediate the impact. Where a third party does not respond appropriately, GreenShield will consider further action consistent with its legal and contractual rights and the level of influence it can reasonably exercise. This may include escalation to relevant regulators or professional bodies, or reconsideration of the business relationship.

SECTION 5 – RAISING CONCERNS

Stakeholders, including employees, customers, suppliers, partners, and members of the public, may raise concerns through GreenShield's existing complaints and ethics reporting channels.

GreenShield expects concerns raised in good faith to be handled promptly, fairly, and confidentially, with protection from retaliation.

SECTION 6 – GOVERNANCE AND ACCOUNTABILITY

This policy is approved by the Board of Directors of GSH. The Board oversees GreenShield's human rights commitments as part of its broader responsibility for the company's social and environmental impact and stakeholder governance.

Management is responsible for implementing this policy and for establishing processes to identify, assess, escalate, and address human rights risks and impacts.

This policy will be reviewed at least every three years, or sooner if needed to reflect material changes in GreenShield's business, risk profile, or applicable standards.