

# **HUMAN RIGHTS POLICY**

## **TEXAS PACIFIC LAND CORPORATION**

### **INTRODUCTION**

Texas Pacific Land Corporation (together with its subsidiaries, the “Company”) is committed to conducting its business in accordance with the highest standards of business conduct and ethics, and applicable laws, regulations, rules and standards.

The Company has a corporate responsibility to respect human rights and to ensure that it is not complicit with human rights abuses. Indeed, the Company views human rights as fundamental to the way it does business and is part of the Company’s core values across all of its business activities. Consistent with that commitment, this Human Rights Policy (the “Policy”) articulates the Company’s commitment to respect all applicable employment, labor and human rights laws and regulations as well as internationally proclaimed human rights.

This Policy is aligned with the United Nations Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights, the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work, the United Nation’s Guiding Principles on Business and Human Rights, and the United Nation’s Global Compact.

In implementing this Policy, the Company is subject to the applicable laws of the jurisdictions in which we carry on our business. The Company commits to monitor the effectiveness and performance of this Policy.

In addition to this Policy, the Company has an Employee Handbook and Code of Business Conduct and Ethics that set out the principles of the Company’s business activities and offers guidance in dealing with issues which may arise.

### **APPLICABILITY AND CERTIFICATION**

This Policy applies to all employees, officers and directors of the Company, including all employees, officers and directors of the Company’s subsidiaries (collectively referred to a “Members”) and applies whether they are working at the Company’s premises or at any other location, including working remotely. In addition, the Company seeks to do business with agents, consultants, contractors, suppliers and other third parties who act in a manner consistent with this Policy.

Members are required to become familiar with this Policy and conduct themselves honestly, ethically and in compliance with applicable laws, regulations, standards and the Company’s policies. Further, Members are required to certify, upon joining the Company and annually thereafter, as to their compliance with this Policy.

This Policy will be reviewed annually with respect to its suitability, effectiveness and alignment to international guidelines and standards, and the Company will provide regular, objective monitoring and reporting on our human rights progress. We welcome feedback and dialogue with interested parties. All feedback and comments on this Policy should be sent to Human Resources.

## **GUIDING PRINCIPLES**

Our commitment to human rights is based on the following principles:

### **1. Members**

The Company is committed to providing a work environment in which each employee is treated with dignity and respect and without discrimination, harassment and any other disruptive behaviors. This applies to recruiting, hiring, compensation, benefits, training, termination, promotions and any other terms and conditions of employment.

The Company has in place an Employee Handbook which includes policies which deal with (inter alia) employment equity, discrimination, harassment, complaints, and health and safety. Members can locate the Handbook on the Company's Employee Resources Drive. The Company also has a Code of Business Conduct and Ethics which sets out (inter alia) how to report concerns, expectations around maintaining a safe and respectful workplace, and how the Company investigates concerns and anti-bribery infringements. The Company has a strict non-retaliation policy against any employee who is in good faith reports a violation of this Policy or any of the expectations outlined in the Company's Code of Business Conduct and Ethics. Members can locate the Code on the Company's website and the Company's Employee Resources Drive.

### **2. Human Rights Due Diligence**

A process for human rights impact and risk assessment is necessary to identify, prevent, mitigate and remedy potential impacts on human rights. The scope of our human rights due diligence focuses on our own business operations, but the Company also has a process to examine opportunities to influence our material third-party business relationships, and those of others, where possible. We endeavor to conduct business with only such third parties who share our values and business principles. We recognize that a heightened level of due diligence is required if our business operations were, in the future, extended to high risk and conflict environments.

### **3. Communities**

The Company is committed to respecting the customs, cultures and values of the communities in which we carry out business activities. The Company believes that individuals impacted by our business have a right to be informed about our activities and be involved in the issues and opportunities affecting them. The Company strongly believes that its business activities should be paramount in contributing to the economic well-being and quality of life where it does business.

The Company further advises its Members to comply with all applicable environmental laws, regulations and standards, and minimize any adverse impact on the environment. The Company advises Members to endeavor to conserve natural resources and energy and reduce or eliminate waste and the use of hazardous substances.

### **4. Reporting concerns**

Members affected by the Company's activities have access to mechanisms to report concerns and such mechanisms are accessible, equitable and transparent as set out in the Company's Code of Business

Conduct and Ethics and Policy on Reporting Concerns. Concerns may be reported as confidential or on an anonymous basis. Any individual may report a concern in writing or orally by communicating it to one of the following:

- Their manager
- Compliance (supervised by the General Counsel unless another person has been designated by the Board)
- Human Resources
- The General Counsel
- Ethics Hotline: 844-639-9563 (oral reporting only)
- Reporting Website at <https://texaspacific.ethicspoint.com> (written reporting only)

Further information is available in the Company's Code of Business Conduct and Ethics on the Company's website and in the Employee Resources Drive within the Company's IT system.

## **IMPLEMENTATION**

Awareness amongst Members is fundamental to ensuring that the goals of this Policy are met and the Company is committed to training and communicating its approach to human rights as part of the implementation of this Policy.

The Company's Human Resources Department is accountable for ensuring this Policy is effectively implemented and all Members engaged in activities under the Company's control are responsible for the application of this Policy. This Policy will be included in the Company's Employee Handbook, which is reviewed annually by the Company.

Members will receive regular mandatory training in Equality, Inclusion and Diversity, non-discrimination and harassment, as well as any job specific training for safety risks.

As this Policy is a key component of the Company's compliance program and plays an integral role in safeguarding the Company's ethical culture and reputation, any violation of this Policy by an individual may result in corrective action and/or termination where permitted by law. In appropriate cases, the Company may also refer misconduct to the proper authorities for prosecution. This may subject the individuals involved to civil and/or criminal penalties.