



Human Rights Policy Statement

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Pure Cycle Corporation is a Colorado-based land and water resource development company committed to maintaining the highest standards of integrity and excellence. Respect for human rights is a fundamental value of our business. We believe that business can only flourish in societies where human rights are acknowledged, respected, and protected.

This Human Rights Statement contains over-arching principles which we embed into our policies, systems, and culture to make certain we do not engage in activities that directly or indirectly violate human rights. It is our corporate responsibility to uphold these principles throughout our entire organization. Additionally, we expect all internal and external stakeholders, including employees, business partners, vendors, contractors, and suppliers, to be aligned with upholding all internationally recognized human rights.

Pure Cycle is committed to respecting the human rights under the following international human rights instruments:

- [The Universal Declaration of Human Rights](#)
- [The International Covenant on Economic and Social Cultural Rights](#)
- [The International Covenant on Civil and Political Rights](#)
- [The UN Guiding Principles on Business and Human Rights](#)
- [International Labour Organization Declaration on Fundamental Principles and Rights at Work](#)

As outlined herein, Pure Cycle continually strives to identify and prevent human rights risks to people across our company and beyond.

Our Human Rights Policy is overseen by Pure Cycle's Board of Directors. Executive management, including the Principal Executive Officer and Principal Financial and Accounting Officer, oversees the implementation of these policies and coordinates our efforts to identify, address, train, and report on our human rights risks and opportunities.

COMMUNITY & STAKEHOLDER ENGAGEMENT

We recognize we are part of the communities in which we live and operate. We engage with members of our community on human rights matters we believe are important to them, such as access to clean and affordable drinking water, sustainable and thoughtful development of our land resources, and protection of the environment through innovative water conservation systems. Pure Cycle strives to ensure we listen, learn from, and consider all internal and external stakeholder input as we conduct business. The satisfaction of all interested parties is a high priority.

DIVERSITY & INCLUSION

We understand that representation matters, and we value the diversity and inclusion of the people with whom we work. We are committed to providing equal opportunity for all employees and endeavor to create and maintain workplaces that are free from discrimination or harassment at any level, particularly on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law. We seek to diversify our workforce while expanding the knowledge and capabilities of our in-house skills, expertise, and perspectives. The basis of recruitment, hiring, placement, development, training, compensation, and advancement at Pure Cycle is qualifications, performance, skills, and experience.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

Where recognized in accordance with local law, we shall acknowledge and respect the right of employees to freedom of association and collective bargaining. No employee shall be subject to harassment, intimidation, or retaliation in their efforts to freely associate or bargain collectively.

SAFE & HEALTHY WORKPLACE

The safety and health of our employees is of paramount importance. We comply with applicable safety and health laws and regulations, as well as internal requirements. Our policy is to provide and maintain a safe, healthy, and productive workplace by addressing and remediating identified risks that could lead to accidents, injury, or detrimental health impacts. This is a standard we also expect of our vendors and suppliers. We provide routine safety awareness and training programs. Additionally, we cover costs necessary for employees to attend vendor and third-party safety certification courses.

WORKPLACE SECURITY

We are committed to maintaining a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

FORCED LABOR & HUMAN TRAFFICKING

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.

CHILD LABOR

We do not engage in or condone unlawful employment or exploitation of children. Our policy is also guided by [Colorado Youth Law](#).

WORK HOURS, WAGES, & BENEFITS

We compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime, and benefit laws.

LAND RIGHTS & WATER RESOURCES

We recognize the significant implications regarding respect for human rights, land use, and water. We will follow all applicable laws and respect international human rights standards relating to the rights to land and natural resources. We respect the need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation. Through our water and wastewater programs, we pursue a rights-based approach to water that mitigates risk by assessing local water risks, consulting and partnering with governments, communities, and other stakeholders to develop water stress solutions where and when needed, and implementing source water protection plans at our facilities.

GUIDANCE AND REPORTING FOR EMPLOYEES

We strive to create workplaces in which open and honest communication among all employees is valued and respected. We are committed to comply with labor and employment laws. Any employee who believes a conflict exists between the language of this policy and the laws, customs, and practices of the place where they work, or who has questions about this policy or would like to confidentially report a potential violation of this policy should raise those questions and concerns with their direct manager, Human Resources, or corporate management. Additionally, they can email our ESG team at esg@purecyclewate.com or, for more serious concerns, please email our Audit Committee at auditchair@purecyclewate.com. No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. We will investigate, address, and respond to the concerns of employees and, as deemed necessary, take appropriate corrective action in response to any violation.