## **Political Activities Policy**

Ovintiv believes that active and constructive engagement in consultations on public policy is an important part of responsible corporate citizenship and is in the interest of our stakeholders including our shareholders. Ovintiv supports involvement in activities that advance Ovintiv's goals and improve the communities where we work and live. Ovintiv considers making political contributions to the extent permitted by law and as may be consistent with this Policy as a constructive way to encourage and support the democratic system.

Ovintiv is committed to the highest ethical standards in all our relationships with government and participates in public policy advocacy by communicating in a legal and appropriate manner on issues that impact Ovintiv's business. At all times Ovintiv will comply with the Company's Lobbying Practice and will act in a manner that demonstrates respect for the democratic process.

Federal, provincial, state and municipal laws relating to election financing exist in Canada and the United States governing corporate involvement in activities of a political nature. This Policy has been approved by the Board of Directors and is intended to help ensure corporate compliance with these laws.

Consistent with Ovintiv's Business Code of Conduct, Ovintiv employees, contractors and directors may choose to become involved in political activities as long as they undertake these activities on their own behalf and may, on a personal level, give to any political party or candidate; reimbursement by Ovintiv is prohibited.

In no circumstances shall any Ovintiv employee, contractor or director be permitted to use or associate their position or office with Ovintiv with any personal political activity or donation or in any circumstances in which any such association could be reasonably inferred.

In Canada, corporations are prohibited from making financial or in-kind contributions to a Canadian federal political party, Canadian federal political party candidate or Canadian federal electoral district association nor are they permitted to make financial or in-kind contributions to an Alberta or British Columbia provincial political party, provincial political party candidate or provincial constituency association.

In the United States, corporations may sponsor political action committees and may support or oppose federal, state, and local candidates and parties under certain circumstances, provided that any decision to make donations, contributions, disbursements or expenditures in connection with any federal or non-federal election is made by a citizen of the United States.

Ovintiv prohibits the following types of political contributions in the United States unless approved in advance by both the President & Chief Executive Officer and the Executive Vice-President Legal Services & General Counsel: (a) direct advertising in support of or opposition to a candidate; (b) direct issue advertising directly or overtly supporting or opposing a particular candidate for election or a political party; (c) contributions to 527 organizations as defined in Title 26 of the United States Code which support or oppose candidates for office but do not coordinate



with candidates or political parties; and (d) contributions 501(c)(4) social welfare organizations that may engage in political activities as defined in Title 26 of the United States Code.

In the event that the President & Chief Executive Officer and/or the Executive Vice-President Legal Services & General Counsel are not United States citizens, the most senior United States citizen Executive Officer and/or the most senior United States citizen legal executive, as applicable, will assume the approval authority referenced above. Given the complexity of the laws and regulations governing political giving in the United States, Ovintiv engages with legal counsel to ensure compliance with federal, state and local rules.

Ovintiv or any of its subsidiaries or affiliates will make only those financial or in-kind contributions permitted by law to a recognized political party, candidate or campaign. All requirements for public disclosure of such contributions shall be fully complied with by Ovintiv, its subsidiaries and affiliates. A report detailing the amount and recipient of all contributions made by Ovintiv and its subsidiaries and affiliates shall be prepared and presented to the Board by Ovintiv's Executive Vice-President & General Counsel annually. The report will include details of corporate contributions to issue campaigns or referenda, payments to 527 organizations, 501(c)(4) groups and other tax-exempt organizations and dues paid to trade associations.

The President & Chief Executive Officer, any one of Ovintiv's Executive Vice-Presidents or any one of Ovintiv's Vice-Presidents, in consultation with Ovintiv's Government Relations Teams, shall have authority to review and to approve requests for political contributions proposed to be made by Ovintiv or any of its subsidiaries or affiliates as permitted above, subject to any limits or restrictions imposed by the President & Chief Executive Officer from time to time. Coordination of political activities, including political contributions, will be done by the Vice-President(s) responsible for Government Relations and will be reviewed by the Ovintiv Executive team on a quarterly basis.

\*Terms bolded and italicized in a policy or practice are defined in the Policies & Practices Glossary and such definitions are incorporated by reference into such policy or practice to the extent used therein.

