

# Supplier Code of Conduct

## Safety. Integrity. Respect. Trust.

At Ovintiv™, we are committed to operating our business ethically and in compliance with all laws and regulations. We expect all of our business suppliers, vendors, contractors, and service providers, including their staff, agents and sub-contractors (“Suppliers”), to embody our values, abide by our policies and practices and comply with all applicable laws and regulations.

Suppliers are responsible for staying up to date on Ovintiv’s expectations in addition to any legal and regulatory requirements for proper compliance and governance. Failure to comply with this Supplier Code of Conduct will impact a Supplier’s ability to continue working with Ovintiv.

### SAFETY

#### Environment, Health & Safety

Ovintiv is committed to protecting our environment, community and the health and safety of all affected by our activities.

Safety is a fundamental value at Ovintiv – and we require the same from our Suppliers. We expect our Suppliers to proactively identify and effectively control risks in all operations. We believe that all workplace injuries, illnesses and incidents are preventable. All individuals performing work for Ovintiv must be fit for work.

Ovintiv is committed to achieving environmentally-conscious performance throughout the entire lifecycle of our operations. Suppliers must operate in an environmentally responsible manner, strive to minimize adverse impact on the environment and adhere to all environmental laws everywhere they operate.

Suppliers must:

- operate in a manner that is consistent with Ovintiv’s commitment to safety and do their part to achieve best-in-class safety performance;
- provide all employees and contractors with a safe workplace, free of all forms of harassment or violence;
- have proper procedures to detect, prevent and handle potential risks to the health, safety and security of employees and the environment;
- comply with all applicable laws and regulations related to health and safety in the workplace and all environmental laws and regulations;
- ensure that they are adhering to Ovintiv’s EH&S requirements outlined in the [Ovintiv Service Provider EH&S Expectations Manual](#) prior to starting, and at all times while providing work for Ovintiv.

# Supplier Code of Conduct

## Audit & Systems

Suppliers must maintain accurate business and operational records as required by law and industry standards and provide access to Ovintiv as required.

Suppliers must:

- conduct internal financial audits to ensure reliability and accuracy of business and operational records;
- have a verification and audit program to evaluate their EH&S management system;
- abide by and support all pre-qualification processes, audits, inspections, spot checks and adhere to rigorous continual verification practices including at the field level; and
- submit their EH&S program and performance information for evaluation and verification by Ovintiv which may include site access, documentation, interviews and subcontractor information.

## INTEGRITY

### Anti-Corruption & Bribery

Suppliers must comply with all anti-corruption laws and regulations related to their work with Ovintiv. This includes, but is not limited to, compliance with Acts such as the *US Foreign Corrupt Practices Act* and the *Canadian Corruption of Foreign Public Officials Act*.

Suppliers must not tolerate or engage in any form of corruption. Suppliers must not make, offer, or authorize (directly or indirectly) any unlawful payment, gift, promise or benefit to anyone on behalf of Ovintiv. Suppliers must transact business with transparency and record transactions appropriately.

### Antitrust & Competition

Suppliers must compete fairly in the industry market and uphold all antitrust and competition laws. Suppliers must not influence a market or take unfair advantage through manipulation, concealment, abuse of proprietary information, fair dealing or any other “act” that may unfairly impact competition, such as price fixing or market allocation or bid rigging.

### Trade Laws

Suppliers must uphold all international and national trade laws – including economic sanctions, embargoes and trade restrictions related to their business with Ovintiv. These trade laws include, but are not limited to, trade restrictions administered or enforced by the various applicable international bodies and government authorities.

# Supplier Code of Conduct

## Business Practices

We expect everyone to commit to the principles in this Code and the highest standards of conduct. Suppliers must maintain integrity, transparency and compliance in all that they do.

**Acceptance of Gifts:** Do not offer or provide any gift, meal, beverages, entertainment or benefit to an Ovintiv employee or contractor (or family member of the same) which may not be in compliance with Ovintiv's Acceptance of Gifts Practice or which may improperly influence, or appear to influence, business decisions.

**Conflict of Interest:** Declare any potential, perceived or actual Conflict of Interest in relation to Ovintiv staff or other Suppliers (i.e. sub-contractors). Suppliers must not unduly influence Ovintiv business decisions.

**Fraud:** Implement appropriate procedures to detect and prevent bribery, corruption, kickbacks and embezzlement.

**Intellectual Property:** Respect and uphold intellectual property rights and software and data licensing obligations. Only use technology in a manner that protects, and is in compliance with, the owner's intellectual property rights.

**Policies & Practices:** Actively support Ovintiv's policies, practices, and protocols. Suppliers should provide mechanisms for reporting concerns or potential violations. Suppliers and their staff are encouraged to use Ovintiv's Integrity Hotline to report concerns or potential violations related to Ovintiv employees or business. Suppliers must prohibit any form of retaliation against an individual for reporting a concern.

**Privacy & Confidentiality:** Abide by all applicable privacy and information security laws and best practices for private, confidential, proprietary or material non-public information. Suppliers must safeguard the privacy of the personal information of customers, employees and stakeholders. In addition, Suppliers must protect against the unauthorized use or misuse of any Ovintiv information or data. This obligation continues even after the working relationship with Ovintiv ceases.

**Proper Use of Ovintiv Assets:** Protect and ensure proper legitimate use of all Ovintiv assets. Protecting against the theft, loss and misuse of assets is the responsibility of all Suppliers, and Ovintiv employees and contractors. If a Supplier becomes aware of any misuse, theft or loss of Ovintiv assets, raise the issue with Ovintiv personnel or report it to Ovintiv's Integrity Hotline.

**Public Disclosure:** Do not speak on behalf of Ovintiv in any form unless formally approved by authorized Ovintiv personnel.

# Supplier Code of Conduct

## RESPECT

### Human Rights & Labor Law

Suppliers must protect, respect, and support human rights measures and comply with all relevant human rights laws and regulations. Suppliers must adhere to all labor laws and regulations. Suppliers must ensure that all legal and statutory requirements are met with respect to their workers.

Suppliers must uphold Ovintiv's Respectful Workplace practice, ensuring a safe and respectful workplace. This includes the promotion of inclusion and diversity and a commitment to providing a healthy, professional and productive work environment. Processes to mitigate, review and remediate unacceptable conduct must be in place and applied as required.

Suppliers must operate in compliance with:

- [United Nations Universal Declaration](#) of Human Rights
- [International Labour Organization](#) Declaration of Fundamental Principles and Rights at Work
- [Canadian Human Rights Act](#)
- Federal, state and provincial Human Rights Acts and Labor Laws

Suppliers must:

- exercise fair hiring practices and provide a safe, secure and respectful work environment, free of harassment, discrimination, bullying, violence, intimidation and any other disrespectful or offensive behavior;
- comply with applicable labor laws governing work hours and compensation including minimum wage, overtime and legally mandated benefits;
- employ only workers who are legally authorized to work in the location of Ovintiv operations. Suppliers are responsible for validating employee's work eligibility status;
- comply with all applicable laws and regulations on freedom of association and collective bargaining;
- not use or tolerate the use of forced, coerced or child labor; and
- understand the important role our industry plays in identifying and preventing human trafficking through increased employee awareness.

# Supplier Code of Conduct

## TRUST

Building and maintaining the trust that others place in us—and that we have for one another—is fundamental to our success. We earn trust by being truthful, delivering on our promises and upholding our commitments. Suppliers are expected to establish and maintain a trusted relationship with Ovintiv and its stakeholders.

The health of the local economy and the social fabric of the communities in which we operate are important to us. We always consider locality of a Supplier to enhance local economies and we encourage all of our Suppliers to do the same through local employment, providing support to the communities and engaging with them to create long-lasting relationships with the communities wherever possible.

Suppliers must establish a way for employees and stakeholders to report concerns or potential violations of the law, regulations or this Supplier Code of Conduct. Suppliers and their staff are encouraged to use Ovintiv’s Integrity Hotline to report concerns or potential violations related to Ovintiv employees or business. Ovintiv does not tolerate any form of retaliation including threats, discrimination, or discipline against anyone who reports a concern in good faith or participates in an investigation. Retaliation is a violation of Ovintiv’s Business Code of Conduct and the law. Any act of retaliation will result in discipline as appropriate, up to and including termination of employment or contract.

### Learn More

- [Ovintiv Business Code of Conduct](#)
- [Service Provider EH&S Expectations Manual](#)
- [Environment, Health and Safety Policy](#)
- [Fitness for Work Practice](#)
- [Respectful Workplace Practice](#)