

## Pembina's Supplier Code of Conduct

Pembina is a leading energy transportation and midstream service provider that has been serving North America's energy industry for more than 65 years. At Pembina, we proudly manage and grow our network of pipelines and facilities in a way that respects our people, our communities, and the environment.

Pembina's reputation is one of our most important assets. Our reputation stems from success in both our technical ability and business accomplishments. Our reputation is also reflected in how we get the job done.

Pembina prides itself on working with Suppliers who place safety as top priority, uphold the highest standards of ethics and integrity, and are economically, environmentally, and socially responsible.

Pembina's business philosophy is grounded in a simple principle – 'do the right thing' – and we expect the same from our Suppliers. We appreciate your shared commitment to these principles and look forward to doing business together.

### **1. Creating a Safe Workplace – "Zero by Choice"**

Working safely is a way of life at Pembina. Our success depends upon ensuring the safety of the public and our people throughout the communities where we operate. We believe all incidents can be prevented, and we work hard to keep our systems and people as safe as possible – including our Suppliers.

We expect that Suppliers align with Pembina's safety culture of "Zero by Choice" and ensure that its personnel recognize "Safety Starts with Me."

Suppliers are encouraged to have the proper policies and management systems to ensure the safety of all people involved in, or impacted by, the performance of their work and to achieve best in class safety performance.

Suppliers are encouraged to maintain standards of performance, which meet or exceed legal, regulatory requirements and industry standards, and provide the training necessary for employees and contractors to understand and meet these standards.

### **2. Environmental Stewardship**

Throughout the planning, construction, and operation of our assets, we take actions that minimize the potential effects our operations could have on the surrounding environment.

Suppliers will be committed to sustainable business practices, protecting the environment, and conducting themselves in a socially responsible way. Suppliers are expected to meet or exceed legal and regulatory requirements.

Suppliers are encouraged to have proper policies and management systems in place to ensure:

- energy and natural resources are used responsibly and efficiently;
- potential impacts of operations on the surrounding environment are minimized/mitigated; and
- waste, emissions and discharge are minimized/mitigated.

### **3. Equity, Diversity, and Inclusion**

Pembina is committed to diversity and equity in the workplace ensuring that our employees can thrive in an inclusive environment. Diversity in our Supplier base is critical to creating a strong and resilient supply chain that provides benefits to the communities in which we operate.

Pembina encourages our Suppliers to actively demonstrate their commitment to equity, diversity, and inclusion through all aspects of their workplace operations and management. We also encourage Suppliers to support the strategic objectives of equity, diversity, and inclusion by participating in our data collection and reporting practices related to these strategies.

### **4. Protection of Human Rights**

Pembina is committed to respecting human rights in its business and operations, regardless of geographical location, informed by the principles of:

- the Universal Bill of Human Rights;
- the United Nations Universal Declaration of Human Rights;
- the United Nations Guiding Principles on Business and Human Rights;
- United Nations Declaration on the Rights of Indigenous Peoples;
- the International Labor Organization's Declaration of Fundamental Principles and Rights at Work; and
- the Organization for Economic Development Guidelines for Multinational Enterprises.

Pembina's employees are expected to comply with all applicable human rights laws and regulations, and the Pembina's policies with respect to human rights, whichever is more stringent.

This commitment extends to all Suppliers performing work for Pembina and we expect our Suppliers and other business partners to respect human rights in their activities. Pembina acknowledges its duty to respect human rights and to remediate human rights impacts.

Suppliers are expected to comply with all applicable human rights laws and regulations, as well as Pembina's policies with respect to human rights, whichever is more stringent.

#### **5. No Forced Labour or Child Labour**

At Pembina, we are opposed to the use of child labour or forced labour, and require Suppliers working with Pembina to commit to the same standard of conduct. Suppliers are required to be able to demonstrate that they do not use child labour or forced labour in the production of goods for Pembina or anywhere in their supply chain. Suppliers are required to have the proper policies and take adequate measures, including exercising due diligence, to prevent the use of child labour or forced labour in their operations and supply chains. As part of Pembina's commitment to ethical business practices, all forms of child labour and forced labour are prohibited.

#### **6. Ethics, Integrity and Compliance**

Pembina supports a free marketplace and the laws that preserve free and fair competition. Suppliers are expected to conduct business fairly and should not engage in any activity that could potentially result in an unfair competitive advantage. Suppliers are expected to maintain and promote the highest levels of professional integrity and uphold Pembina's reputation and standing in the community.

#### **7. Anti-Corruption and Anti-Bribery**

Corruption poses legal, commercial, and reputational risk to Pembina. Pembina conducts business honestly and ethically and expects all those working with Pembina to commit to the same standard of conduct and compliance with anti-corruption laws. As part of Pembina's commitment to conducting business with integrity, all forms of corruption and bribery are prohibited.

Bribery and corruption can take many forms, including cash payments, kickbacks, lavish travel expenses and illegal political contributions.

#### **8. Privacy, Confidentiality, and Information Security**

Protecting information and confidentiality is extremely important to Pembina regardless of whether it is personal or corporate. Suppliers are expected that personally identifiable information is treated with respect and protected from collection or disclosure without the consent of Pembina and that any information shared while doing business with Pembina is protected and used appropriately.

Suppliers are expected to:

- have effective protocols in place for securing and protecting Pembina information (including but not limited to the proprietary and intellectual property of Pembina (“IP”) and Personally Identifiable Information (“PII”)) and strictly observe all data privacy legal requirements;
- immediately notify Pembina if any information we provided or have given you access to has been, or is suspected to have been, lost, stolen, or inappropriately accessed, used, or disclosed; ensure that access to Pembina’s information is only provided to personnel specifically approved by Pembina, unless required by law;
- take all measures necessary to protect the privacy rights of our employees, customers and affiliates and ensure that any information shared with you is handled in accordance with applicable privacy laws;
- protect business continuity by identifying risks to service assurance and having appropriate recovery plans for products and/ or services that you provide to us, as required by us;
- have appropriate Cyber Security programs, processes, and controls in place to ensure the security, confidentiality, integrity, and availability, of your systems, processes, and services, and report any actual or suspected cyber security incidents affecting your company immediately as you become aware; and
- all non-public information about Pembina, its partners or its customers should be considered confidential information. To use non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is unethical and illegal. Use or disclosure of this information can result in civil or criminal penalties.

#### **9. Compliance with Applicable Laws and Policies**

Suppliers must comply with all applicable laws and regulations and are expected to comply with and maintain policies that are equal to or greater than Pembina’s Code of Ethics Policy and this Supplier Code of Conduct. Further, Suppliers are expected to comply with Pembina’s other applicable policies, whether made available at [www.pembina.com](http://www.pembina.com) or as otherwise made known to Suppliers from time to time.

#### **10. Representing the Pembina Brand**

Suppliers are expected to conduct themselves consistent with Pembina’s core values and beliefs, and in support of the Pembina brand. Supplier’s use of Pembina’s brand, responding to media inquires/requests for information regarding Pembina or referencing any work performed for Pembina is not permitted without express written permission of Pembina’s Manager, Communications and Media Affairs. For more information, contact [media@pembina.com](mailto:media@pembina.com).

## 11. Reporting Breaches of the Code/Whistleblower Hotline

Pembina is committed to maintaining a professional relationship where Suppliers feel free to report any irregularities or violations of this Code, without fear of retribution, retaliation or inaction.

Suppose Suppliers observe or become aware of an actual or potential violation of this Code of Conduct or of any law, rule or regulation, whether committed by Pembina personnel, by others associated with Pembina or someone within their organization. In that case, it is the individual's responsibility to report the circumstances to a member of Pembina's Senior Management or use Pembina's confidential Whistleblower line.

Hosted by a third-party service provider, EthicsPoint, the Hotline provides a confidential, accessible tool for anyone wanting to report a concern or ask a question.

### How to Access the Hotline:

Make an online report: [pembina.ethicspoint.com](http://pembina.ethicspoint.com)

Toll-free Whistleblower line in Canada and the US: **1-855-375-6799**