

# Investigations Standard

**Owner: Director Security & Investigations**

Effective date: February 13, 2013

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## Purpose

The Investigations Standard (Standard) supports Cenovus's commitment to a safe and healthy workplace by the establishment of an Investigation Committee (IC). The IC oversees investigations of workplace concerns, complaints and allegations of violations of Cenovus's policies and standards in a fair, consistent and appropriate manner.

This Standard, the Investigations Process and other associated standards and processes inform staff of the:

- Purpose of investigations.
- Roles and responsibilities of the IC and the members of the IC.
- IC's commitment to confidentiality.
- IC's support for staff related to potential policy or standard breaches.

## Scope

This Standard applies to everyone working on behalf of Cenovus Energy Inc. and its subsidiaries, in all locations where we conduct business. Where specified by our standards, policies and/or applicable law, this Standard may also apply to Cenovus suppliers. Cenovus suppliers are expected to review Cenovus's Code of Business Conduct & Ethics (the Code) and are expected to align with the principles and guidance it provides.

## Roles and responsibilities

**Investigations Committee (IC) Chair** - Responsible for:

- Reviewing complaints, concerns, and allegations documented via intake forms.
- Supporting the complainant, respondent and witnesses during an investigation.
- Determining and communicating findings.
- Completing investigation reports.
- Ensuring all investigations including interviews of complainants, respondents and witnesses are conducted in a fair, objective, and ethical manner with integrity and due process and in accordance with this Standard and the Investigations Process.
- Providing accurate and timely IC governance, reporting quarterly to Cenovus's Board Committees.
- Investigating reports of behavior contrary to Cenovus Standards, including, but not limited to harassment and discrimination, retaliation and other breaches outlined in Related Policies and Standards.

**The IC Chair** leads the IC to ensure the IC functions properly, that all relevant matters are discussed and that effective decisions are made and carried out. Works closely with the IC Legal representative to ensure privilege, confidentiality and privacy are maintained over all IC matters and that all investigations are conducted with due process. Responsible for reporting to the Board of Directors, CLT, Human Resources & Compensation Committee (HRCC) and the Business Conduct & Integrity (BCI) Committee in accordance with this Standard and the Investigations Process.

**Investigations Legal Representative** – Provides legal oversight and legal advice to the IC. Directs investigations to ensure due process is followed and privilege is maintained.

**Internal Audit** – Is responsible to provide subject matter expertise and assist with investigations utilizing audit expertise as needed.

**Audit Committee** – Is responsible to review all financial related investigations undertaken by IC and receive reports quarterly via Audit Committee report.

**Leaders** – Are expected to assist IC with investigations as requested and to report known or alleged violations including any confidentiality breaches or retaliation associated with an investigation.

**Staff** - Are responsible for reading, understanding and complying with this Standard and for participating in/cooperating with investigations in accordance with this Standard and related Cenovus policies and standards. Staff have a duty to report known or alleged violations, are expected to behave ethically and uphold Cenovus's values and are required to fully cooperate and assist in investigations.

## Standard statements

### Breaches and violations investigated

All complaints, concerns and allegations of violations of Cenovus's policies and standards are taken seriously and are investigated in accordance with the Investigations Process and other established procedures and in alignment with:

- Cenovus's values.
- The Code of Business Conduct & Ethics (Code) and other Cenovus policies and standards.
- Legal and regulatory requirements.

### Procedural fairness

All investigations pursuant to this Investigations Standard and the Investigations Process are conducted in accordance with the principles of procedural fairness and due process.

### Timeliness

All investigations are conducted in a timely manner and in accordance with the processes and procedures as outlined in the Investigations Process.

### Subject Matter Experts (SMEs)

The IC works closely with SMEs as applicable, including IT System Controls and Monitoring, Supply Chain Management, Disability Management, Internal Audit, the Privacy Officer and Legal.

### Confidentiality and privacy

The IC is committed to confidentiality during the investigation process. All parties, including the complainant, respondent, and witnesses, are expected not to disclose or discuss the nature of complaints, or their participation in an investigation, to others.

### Documentation and records

All electronic records associated with an investigation are stored in a restricted folder and all hard copy records are secured, accessible only by the IC.

### Protection from retaliation

In accordance with the Investigations Process, retaliation against the complainant or any employee, contractor or third party who make good faith reports or who participate in investigations, in accordance with this Standard and Investigations Process, will not be tolerated.

### Conclusion of investigations

Upon completion of an investigation, the respondent is notified of the finding pertaining to the allegation against him/her/them.

## Reporting

The IC reports on investigations as set out in the Investigations Process.

## Compliance and enforcement

### Monitoring

The IC Chair is responsible for monitoring compliance with this Standard through periodic review and a centralized management process.

The IC may monitor, review, access and/or disclose information for investigative or legal purposes in accordance with legislative and regulatory requirements.

### Consequences of non-compliance

Violation of this Standard or other related Cenovus policies or standards may lead to disciplinary action up to and including termination of employment or service arrangements. In cases where local or international law or regulations are violated, Cenovus may have a responsibility to inform relevant legal and/or regulatory authorities.

## Support

Staff may direct complaints, concerns or allegations to:

- A member of the IC, either directly, through the IC email at [investigations@cenovus.com](mailto:investigations@cenovus.com) or via regular mail addressed to the IC
- The [Integrity Helpline](#)
- Their Leader or HRBP

Where staff do not feel comfortable reporting complaints, concerns or allegations by the above methods they may also choose to report complaints, concerns or allegations to a member of Enterprise Security or a member of Cenovus's Legal team.

## Related policies and standards

- [Acceptable Use of Information Technology Standard](#)
- [Alcohol & Drug Standard](#)
- [Anti-Bribery, Anti-Corruption & Anti-Money Laundering Standard](#)
- [Code of Business Conduct & Ethics](#)
- [Competition & Antitrust Law Compliance Standard](#)
- [Employee Privacy Standard](#)
- [Fit for Duty Policy](#)
- [Intellectual Property Standard](#)
- [Investigations Process](#)
- [Policy on Disclosure & Employee Trading](#)
- [Privacy Policy](#)
- [Sustainability Policy](#)
- [Trade Compliance Standard](#)
- [Workplace Violence & Harassment Prevention Standard](#)

## Glossary

**Complainant:** The person who brings forward a complaint to the IC.

**Leaders:** Any employee or Cenovus representative who has one or more people reporting to them and provides guidance in the undertaking of day-to-day work.

**Respondent:** The person named within a complaint, concern or allegation.