

Supplier Code of Business Conduct

Owner: Vice-President, Supply Chain Management

Effective Date: June 15, 2021

Last Updated: January 8, 2025

Last Reviewed: January 8, 2025

Purpose

This Supplier Code of Conduct (Code) outlines Cenovus's supplier principles regarding ethical standards, values, and business conduct in alignment with Cenovus's Code of Business Conduct & Ethics. This Code has been designed to provide Cenovus's suppliers with the tools and principles needed to conduct business in a safe, legal and ethical manner on behalf of Cenovus.

Scope

This Code applies to all suppliers working for and on behalf of Cenovus Energy Inc. and its subsidiaries (Cenovus), including service providers, contractors, consultants, manufacturers, fabricators, distributors, vendors or any entity that provides Cenovus with goods or services (collectively "Suppliers").

These principles are not replacements or substitutes for the *Code of Business Conduct and Ethics* or applicable laws, nor do they amend contractual obligations.

Roles and Responsibilities

We encourage Suppliers to take reasonable and practicable measures to ensure they respect, uphold and communicate this Code across their business enterprise and within their supply chains.

Within Cenovus, the Vice-President, Supply Chain Management and Regional Vice-President, Commercial and Strategic Partnership, Asia Pacific are accountable for the governance of this Code.

Policy Principles

Supplier Engagement

In accordance with Cenovus's *Code of Business Conduct and Ethics*, our Suppliers enhance our competitiveness, resiliency and sustainability, but never at the expense of our values or reputation. Our Supply Chain Management team supports sourcing, contracting and post-award activities, and manages our Supplier relationships. Suppliers are encouraged to contact Cenovus's Supply Chain Management team for additional information.

- Cenovus purchases goods and services from qualified Suppliers based on fair, objective criteria, including safety, quality, service offerings and price.
- We screen all our Suppliers and counterparties to determine if there's risk in doing business with them.
- Cenovus competes fairly and honestly in the markets in which we operate. We do not interfere or attempt to interfere with the normal operation of markets through any means.

Health, Safety, Environment and Quality

At Cenovus, safety is our top value and the safety of our workers, the community, and the environment are

always at the forefront. Cenovus engages with Suppliers who make health, safety, protection of the environment and quality a priority in all their business activities.

Suppliers are expected to:

- Meet or exceed Cenovus's policies and expectations related to health, safety, environment and quality.
- Comply with Cenovus's *Fit for Duty Policy*, including the *Alcohol & Drug Standard*.
- Comply with Cenovus's *Life Saving Rules* as recommended by *Energy Safety Canada*.
- Commit to Cenovus's safety culture and our eight safety commitments contained within our *Safety Policy*, while providing and maintaining a safe work environment that integrates sound health, safety, environment and quality management practices into their business.
- Strive for continuous improvement in occupational health, safety, environmental and quality performance.

Human Rights and Labour

Cenovus engages with Suppliers who respect international, national and local laws regarding human rights and labour practices.

Suppliers must:

- Not use child labour, forced labour, human trafficking or slavery.
- Comply with applicable jurisdictional requirements on wages, public holidays, sick leave provisions, work hours, freedom of association and collective bargaining.
- Provide a healthy, safe and secure workplace.
- Comply with Cenovus's *Workplace Violence & Harassment Prevention Standard*.
- Comply with employment and labour practices, regulations and standards and applicable jurisdictional workplace, employment, privacy and human rights laws.

For more information, refer to Cenovus's' *Human Rights Policy* and annual *Modern Slavery Report*.

Respectful Workplace

Cenovus is committed to creating a respectful workplace culture in all locations we conduct business. Creating an environment where everyone gives respect and can expect to receive it in return — an environment that's free from harassment and discrimination — is a company priority. Behaviours such as workplace violence, harassment, and other actions that don't support Cenovus's values will not be tolerated.

Our Expect Respect campaign helps ensure all staff and Suppliers understand our expectations and how to report inappropriate behavior, when working for Cenovus. Expect Respect means:

- Feeling physically and psychologically safe at work.
- Speaking up if you see something that doesn't align with Cenovus's policies or standards.
- Following the Cenovus values.

Business Integrity, Privacy and Data

Cenovus works with Suppliers who comply with applicable laws and regulations of the jurisdictions in which they do business including protection of personal information, intellectual property and data and who conduct business ethically with integrity. Cenovus encourages Suppliers to conduct business activities in a manner that upholds Cenovus's values, reputation and the *Code of Business Conduct & Ethics*.

Suppliers are expected to ensure Cenovus's confidential and sensitive information is protected and secured, through proper controls, including secure storage, passwords and codes, secure transmission, physical safeguarding of devices, and deletion or shredding, in accordance with the *Data & Information Management*

Policy and *Acceptable Use of Information Technology Standard*. This includes Suppliers maintaining and applying industry-standard practices, risk-based approaches, and mitigation controls pertaining to cyber security when working with data and information to identify, avoid, transfer, manage, and reduce overall cyber security risks for Cenovus.

Sustainability and Responsible Sourcing

Cenovus strives to embed sustainability into the way we do business by creating a safe and inclusive workplace, investing in and partnering with local and Indigenous communities, and working to reduce our greenhouse gas emissions and minimize our impact on the environment.

Cenovus works with Suppliers who recognize the importance of sustainable development, social performance and responsible sourcing. Responsible sourcing is an approach to sourcing and supply chain management where a Supplier strives to actively and consciously source goods and services in an ethical, sustainable and socially conscious manner.

Suppliers are expected to cooperate with Cenovus to:

- Strive to integrate environmental considerations in work execution.
- Explore opportunities and participate in providing benefits to local communities through community investment, sub-contracting or employment opportunities.
- Strive to create an inclusive and diverse workforce and supply base.
- Extend opportunities to explore partnerships with Indigenous, minority owned and local businesses.

Conflicts of Interest, Fraud, and Other Irregularities

Conflicts of interest, or even the appearance of a conflict of interest, can negatively affect Cenovus's business and reputation. Suppliers are expected to notify Cenovus of any known conflicts of interest in a timely manner to their Cenovus contact or directly to the *Integrity Helpline*.

Fraud is any act that results in an actual benefit, or an attempt to gain a benefit, through deceit, dishonesty, concealment or violation of trust, and can violate applicable civil and criminal laws. This can include theft, misappropriation of funds, supplies, resources, time, equipment or other assets, or a misstatement of information or records for gain or benefit. Suspected incidents of fraud or theft should be immediately reported to the *Integrity Helpline*.

Cenovus does not tolerate soliciting, accepting or paying bribes, kickbacks or other illicit or improper payments for any purpose, particularly when public officials are involved. Additionally, we do not do business with individuals or entities or within jurisdictions that are prohibited under sanction or embargo laws.

Reporting and Review

Cenovus has mechanisms in place to receive, investigate and report on business or workplace conduct concerns or concerns with this Code, including through the confidential *Integrity Helpline*.

This Code will be reviewed periodically to ensure it supports Cenovus's business strategy and aligns with industry practices.

References

The following standards were used in preparing this Code and may be a useful source of additional information:

- *ILO International Labor Standards*
- *ILO Code of Practice in Safety and Health*

- *OECD Guidelines for Multinational Enterprises*
- *Universal Declaration of Human Rights*
- *United Nations Convention Against Corruption*

Support

We encourage Suppliers or individuals with concerns or questions about this Code to discuss them with your Cenovus contact.

Compliance and Enforcement

In addition to the provisions outlined in this Code, Suppliers must also comply with the policy documents located at our external website: <https://www.cenovus.com/Suppliers/Policies>