

# SUPPLIER CODE OF CONDUCT

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## INTRODUCTION

This Supplier Code of Conduct (the “**Code**”) supports Keyera’s Business Code of Conduct. The Code applies to any organization or person that provides materials, goods and/or services to Keyera, including suppliers, contractors, subcontractors, vendors, service providers, consultants, business partners, and purchasers of Keyera’s surplus equipment (each a “**Supplier**”).

Suppliers are responsible for meeting the expectations and requirements outlined in the Code and related policies, practices and guidelines, and for ensuring their personnel are aware of the Code in relation to any work performed for or goods supplied to Keyera. Pursuant to Supplier’s contractual obligations, Suppliers shall ensure their employees and subcontractors comply with this Code. We expect our Suppliers to respect our values and expectations for ethical conduct when working with us. Current Supplier-related policies can be found on our [current Suppliers webpage](https://www.keyera.com/suppliers/existing-keyera-suppliers/) (online: <https://www.keyera.com/suppliers/existing-keyera-suppliers/>).

Keyera requires Suppliers to conduct business according to the Code and to the laws, rules and regulations applicable in the jurisdictions in which we operate and in which the Supplier operates, whichever provides a stricter obligation.

## QUESTIONS AND CONCERNS

Suppliers who have questions about the Code are encouraged to speak with their Keyera representative or contact [scmgovernance@keyera.com](mailto:scmgovernance@keyera.com).

Any Supplier or other individual who is aware of, or concerned about, an actual or potential breach of the Code (or other Keyera policy, practice, or guideline) is required to report that concern to a Keyera representative or submit a report via confidential and anonymous CARE Hotline (“**Hotline**”), which is monitored by our General Counsel.

PHONE 1-855-484-CARE

EMAIL [UseCARE@ca.gt.com](mailto:UseCARE@ca.gt.com)

WEB [www.grantthorntoncare.ca](http://www.grantthorntoncare.ca)

Keyera will not tolerate any form of harassment, retaliation or discipline against anyone who, in good faith, raises a question or reports a concern, whether directly or via our Hotline.

## ABOUT KEYERA

As one of Canada's largest independent midstream businesses, Keyera has a long history of providing safe and responsible energy infrastructure solutions and our vision is *To be the North American leader in delivering energy infrastructure*. In delivering on this vision, we partner with Suppliers and expect them to act consistently with our values, business ethic commitments and policies. We strive to hold ourselves to the highest ethical standards and we expect the same of all our Suppliers.

### Our Values

Our values are the foundation for how we execute our day-to-day work, drive results and engage with our customers and stakeholders. We expect our Suppliers to uphold our values when working with or on behalf of Keyera.



#### HOME SAFE

I take action to protect people & the environment



#### OWN IT

I deliver on my commitments



#### ALL IN

I work with others across Keyera to achieve superior outcomes



#### COUNT ON ME

I make decisions for the right reasons



#### DRIVE VALUE

I am driven & passionate about creating value for Keyera's stakeholders

## COMPLYING WITH LAWS, REGULATIONS AND POLICIES

Supplier must comply with all applicable, rules and regulations in the jurisdictions where Supplier operates and provides services, including without limitation, employment and labour laws and health and safety laws. Suppliers must also comply with Keyera policies, practices and guidelines to the extent that they do not conflict with applicable laws, rules and regulations. In doing so, Suppliers must also assist Keyera conduct any investigation Keyera believes is reasonable required with respect to any event or circumstance involving Suppliers' personnel.

### A. Human Rights

Keyera respects human rights and acknowledges the spirit and intent of the principles set out in the United Nations Universal Declaration of Human Rights and the International Labour Organization's Declaration of Fundamental Principles and Rights at Work.

Suppliers are required to follow fair labour and employment practices. Suppliers shall have in place internal policies and procedures that meet or exceed the requirements of human rights and employment standards legislation applicable in the jurisdictions in which Suppliers operate, including legislation related to working conditions, minimum wage, hours worked, and health and safety standards.

### B. Forced and Child Labour

Suppliers must prohibit all forms of forced labour, child labour and human trafficking, and must fully comply with all applicable laws concerning human rights, slavery, forced labour and child labour, including the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada).

Suppliers shall have policies and practices in place to ensure that any goods delivered to Keyera have not been produced using forced labour or child labour within the meaning of applicable legislation.

### C. Diversity, Equity & Inclusion

Keyera values diversity, equitable opportunity, and inclusion. Keyera strives to build, and encourages its Suppliers to build, a work environment where individuals are engaged, feel psychologically safe and valued, are treated fairly, and have equitable access to opportunities and resources, including, as appropriate, work assignments, pay, safe working conditions, training, and benefits.

Suppliers must comply with applicable laws relating to discrimination in hiring, employment practices, and shall have in place internal policies which prohibit discrimination based on faith, race, colour, ancestry, ethnic origin, family status, disability, age, sexual orientation, gender, or any other ground protected under applicable human rights legislation.

### D. Respectful Workplace

Keyera recognizes the dignity and worth of every worker, and will not tolerate discrimination, harassment, abusive comments, violence, and other inappropriate conduct is not tolerated. Keyera expects Suppliers' workers to treat everyone with respect and avoid behaviours that could be perceived as intimidating, threatening or discriminatory. Health and Safety, including psychological safety, are an integral part of the way Keyera conducts its business. Keyera is committed to, and expects its Suppliers to be committed to,

addressing and resolving allegations of discrimination, harassment or violence promptly, confidentially and effectively. Please refer to Keyera's *Workplace Discrimination, Harassment and Violence Policy* for further details.

## **E. Health & Safety**

Keyera is committed to the health, safety and wellness of our workers and the public. We believe every activity can be done safely. At Keyera, no job is more important, no service more urgent, than maintaining a safe, healthy and environmentally responsible workplace.

Keyera expects Suppliers to comply with applicable health and safety laws and regulations. We also expect Suppliers to operate in alignment with Keyera's safety values and follow Keyera's Health and Safety-related policies, processes and procedures, operational excellence standards and corporate safe operating practices.

Keyera expects its Suppliers to ensure appropriate staffing to avoid unsafe working hours and to provide adequate rest periods between shifts. Suppliers should consider fatigue management and transportation to and from worksites when determining work hours and rest periods. Keyera generally considers 12 hours to be the upper limit of safe working hours.

Keyera expects that all Suppliers and their personnel to share our commitment to safety. Please refer to *Keyera's Health, Safety and Environment Policy* for further details.

## **F. Environment**

Environmental protection and stewardship are integral to the successful operation of our business. Keyera strives for responsible development of energy resources. We expect Suppliers to operate in alignment with Keyera's Environment-related policies, processes and procedures, operational excellence standards and corporate safe operating practices. We require Suppliers to comply with applicable environmental laws and regulations, as well as work in alignment with our commitment to mitigate environmental impacts.

## **G. Fair Dealing**

All Suppliers must have internal policies requiring their personnel to deal fairly with their workers, customers, contractors, industry partners and other external stakeholders. This obligation includes not taking unfair advantage of such individuals through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or other unfair dealing.

Each Supplier must act in compliance with competition and antitrust laws in the jurisdictions in which the Supplier conducts business or operates. Suppliers must not discuss prices offered to Keyera, or any other competitively sensitive information related to Keyera, with anyone outside Keyera, and in particular with other Suppliers our industry peers or competitors.

## INTEGRITY & CONFLICTS OF INTEREST

Core to Keyera's culture is that we do the right things for the right reasons. Suppliers must have policies and procedures in place requiring Suppliers' workers to avoid situations where their personal interests could conflict with or appear to conflict with their duties and responsibilities. Conflicts of interest include, without limitation, if an activity, investment, or relationship creates (or has the appearance of creating) competing loyalties; impairs one's ability to act impartially, prevents proper performance of duties or obligations to Keyera; or diminishes Suppliers' ability to perform contractual obligations in good faith.

Suppliers must have internal policies and practices with mechanisms for disclosing actual or potential conflicts of interest. Suppliers must disclose any actual or potential conflicts of interest that arise as a result of its business dealings with or on behalf of Keyera.

### **A. Anti-Bribery & Anti-Corruption**

Suppliers are required to fully comply with all applicable anti-bribery and anti-corruption laws, including without limitation the Corruption of Foreign Public Officials Act (Canada), the US Foreign Corrupt Practices Act and UK Bribery Act. Keyera's expectation is that Suppliers will not provide, or engage third parties to provide, "facilitation payments" or "kickbacks" or personal benefits, or other promises to their suppliers, contractors, service providers or any other person in the course of or related to providing Services to Keyera.

### **B. Gifts & Entertainment**

Suppliers must not offer or accept any gifts or other items of value in-order to obtain advantages or influence for the Supplier, Keyera or any other person. Gifts may include without limitation entertainment (for example, meals, receptions and tickets to participate in leisure, social or sporting events), favours and payments (for example, cash, payments made to personal accounts or granting or receiving loans). Giving and receiving gifts is a generally accepted business practice, however it becomes an ethical issue when such gifts and entertainment are unreasonable and/or a person's judgement is or could be seen to be compromised due to the corresponding personal benefit the recipient receives or expects to receive.

### **C. Sanctions and Trade Laws**

In providing goods or performing services for Keyera, Suppliers must fully comply with all applicable trade, export control and sanctions laws and regulations.

### **D. Indigenous & Community Engagement**

Working collaboratively with, and contributing to the shared health and success of, the communities in which we live and operate has always been important to Keyera. We believe that strong relationships are built on trust, understanding and respect. Suppliers must not do anything or fail to do anything that would jeopardize Keyera's relationship with Indigenous rightsholders and community stakeholders.

### **E. Public Statements & Use of Keyera Brand**

Suppliers are not permitted to use Keyera's brand or otherwise reference any work performed for Keyera without Keyera's express written permission. Keyera has designated a limited number of authorized

spokespersons to communicate with the public, securities regulators, the media or the government. No person is permitted to speak on behalf of Keyera unless expressly authorized to do so.

## PROTECTION AND USE OF KEYERA INFORMATION AND BUSINESS ASSETS

### A. Responsibility for Tools & Materials

Suppliers are expected to adequate controls in place to prevent loss or theft of their tools, vehicles, materials, supplies and other property required to perform services or supply goods to Keyera.

### B. Confidential Information

Suppliers have an obligation to strictly protect confidential information and are required to have policies and processes in place to provide appropriate protections for such information. Suppliers must not take advantage of or seek personal benefit from confidential information obtained through or from Keyera.

### C. Personal Information

Keyera is subject to privacy laws including, without limitation, the *Personal Information Protection Act* (Alberta), and views the rights protected by these laws as fundamental rights. To the extent that Suppliers receive any information about an identifiable individual while providing goods or services to Keyera, in addition to complying with applicable privacy laws and the terms and conditions governing Keyera's relationship with Supplier related to privacy, Suppliers are required to have policies in place with respect to the collection, use, disclosure, processing and protection of such personal information and shall have mechanisms in place to allow individuals to exercise their rights with respect to their own personal information.

### D. Insider Information

Keyera believes in the principle that everyone participating in securities markets should have equal access to information that could affect their decision to buy, sell, or hold securities. While providing goods or services to Keyera, Suppliers may be exposed to or acquire undisclosed material information regarding Keyera or third parties and may therefore be subject to applicable securities laws prohibiting or restricting trading in certain securities of Keyera and/or such third parties.

Material information is information that might reasonably be expected to significantly affect the market value of securities. In general terms, information is material information if there is a substantial likelihood that a reasonable investor would consider the information important in deciding whether to buy, sell, or retain securities.

### E. IT Assets

Suppliers must follow Keyera information technology (IT) policies and protocols when accessing Keyera systems, and they must have internal controls to ensure safeguarding of IT-related information. Suppliers who use or have access to Keyera's IT shall ensure their personnel have received adequate cyber security training prior to using or accessing Keyera's IT. As a condition of accessing or using Keyera's IT, Keyera may, at Keyera's discretion, also require Suppliers personnel to complete Keyera's cyber security training programs. Please refer to Keyera's *Cyber Security Policy* for further details.

## ACCURACY OF BOOKS AND RECORDS

Keyera expects its Suppliers to keep accurate and complete records to fulfill relevant legal requirements. Recording and reporting information, including information related to operations, environment, health and safety, training, human resources, and financial matters, must be done honestly, accurately and with care.