

Supplier Code of Business Conduct

Owner: Vice-President, Supply Chain Management

Effective date: June 15, 2021

Purpose

This Supplier Code of Conduct (Code) outlines Cenovus's supplier principles regarding ethical standards and business conduct in alignment with Cenovus's Code of Business Conduct & Ethics.

Scope

This Code applies to all suppliers 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 & 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 VP Supply Chain Management and VP Commercial Asia Pacific are accountable for the governance of this Code.

Policy principles

Health, safety, environment and quality

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 Cenovus policies and expectations related to health, safety, environment and quality.
- Comply with Cenovus's Fit for Duty Policy, including the Alcohol & Drug Standard.
- Commit to provide and maintain 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.

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 and reputation and the Code of Business Conduct & Ethics.

Sustainability and responsible sourcing

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.

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/contractor/policies.html>