



# PETRONAS Energy Canada Ltd.

## Whistleblower Policy

### Policy Statement

PETRONAS Energy Canada Ltd. (PECL) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing those values, PECL provides an avenue for its employees, service providers and members of the public to report conduct that is inconsistent with PECL's governance and good business practices.

### Objective of the Policy

This Policy provides an avenue for PECL's employees, service providers and members of the public to report conduct inconsistent with our governance and good business practices and to provide protection for whistleblowers who report such allegations.

### Scope of the Policy

This Policy enables whistleblowers to report misconduct through internal channels, including but not limited to:

- i. Fraud;
- ii. Bribery or Corruption;
- iii. Abuse of Power, Bullying or Harassment;
- iv. Conflict of Interest;
- v. Theft or Embezzlement;
- vi. Misuse of PECL's Property;
- vii. Non-Compliance with PECL's Code of Business Conduct and Ethics or other governance; and
- viii. Criminal Activity

A handwritten signature in black ink, appearing to read "M Fitzgerald".

Mark Fitzgerald  
President & CEO  
PETRONAS Energy Canada Ltd.  
November 12, 2024

### Applicability of the Policy

This Policy applies to all PECL's business and every employee, service provider, director and officer of PECL.

### Report Concerns

All reports are to be filed via secure and confidential channels in accordance with PECL's Whistleblower Framework.

### Protection of Whistleblower

A whistleblower's identity will be kept confidential, to the extent reasonably practicable. In addition, a whistleblower that reports a concern in good faith will be protected against retaliation regardless of whether that concern is ultimately determined to be invalid.

### Anonymous Whistleblower

Anyone who makes a whistleblower report is encouraged to include their identity but may choose to remain anonymous.

### Expectations

Whistleblowers should provide as much information as possible when making a report and cooperate during investigation. At PECL's discretion, a whistleblower may be provided with updates during the investigation, however the confidentiality and integrity of the investigation must be prioritized.

Whistleblowers can expect their report will be treated seriously, fairly and promptly.

*PECL reserves the right to amend this policy from time to time.*