

# Prevention of Corruption Policy

Ovintiv's Business Code of Conduct and Corporate Responsibility Policy establish our commitment to conducting our business ethically and legally. This Prevention of Corruption Policy will be used in identifying and managing corporate and individual risk relating to corrupt practices or improper payments.

Corruption poses a serious legal, commercial and reputational risk to Ovintiv. The purpose of this Policy is to support Ovintiv's commitment to ethical business practices and commits Ovintiv and its employees, contractors and directors to full compliance with the Corruption of Foreign Public Officials Act (Canada), the Foreign and Corrupt Practices Act (United States of America) and any other equivalent national, state or local anti-bribery or anti-corruption laws.

## **Bribery**

Unlawful or unethical behavior in Ovintiv's workforce, including soliciting, accepting or paying bribes or other illicit payments for any purpose, is not tolerated. Situations where judgment might be influenced by, or appear to be influenced by, such unlawful or unethical behavior must be avoided. To ensure compliance with anti-corruption laws in all applicable jurisdictions, no Ovintiv employee, contractor or director shall directly or indirectly undertake any improper payment activity with respect to foreign or domestic officials, employees of state-owned enterprises or any individual conducting business in the private sector.

Acceptance of gifts and political contributions must be made and accepted according to Ovintiv's Acceptance of Gifts Practice and Political Activities Policy respectively.

## **Community Investment**

Ovintiv's community investment program provides cash donations, sponsorships and gifts-in-kind to charitable and non-profit community organizations located in and/or serving our operating communities. Where a community investment is proposed, it must be transparent, documented in reasonable detail and made in accordance with applicable laws, Ovintiv's community investment guidelines and this Policy.

## **Facilitation Payments**

Ovintiv, its employees, contractors, directors, or anyone acting on the Company's behalf shall not make facilitation payments. A facilitation payment is an occasional payment of minimal value (typically less than C\$100) made solely to expedite or secure performance of a routine, non-discretionary, government action.

## **Exigent Circumstances**

Nothing in this Policy prohibits the making of payments to government officials when life, safety or health is at risk. Such payments should be as modest as reasonably possible in the circumstances. Protection of property is generally not an exigent circumstance. The making of such a payment should be reported to the appropriate division or corporate group Vice-President and the Corporate Secretary (or their respective delegate), as soon as possible. Such payments must be recorded in reasonable detail, including the amount provided and the purpose of the payment, and may be disclosed in accordance with applicable securities laws.

## **Mergers, Acquisitions, Joint Ventures and Partnerships**

Ovintiv is committed to undertaking appropriate due diligence in evaluating the reputation and integrity of any business which it invests in or enters into a joint venture or partnership agreement with.

Ovintiv will use commercially reasonable efforts to ensure that the principles established in all Ovintiv policies, practices and guidelines are materially complied with in joint venture or partnership agreements to which Ovintiv is a party.

## **Accounting and Transparency**

Ovintiv's books and records must reflect in reasonable detail its transactions in a timely, fair and accurate manner in order to permit the preparation of accurate financial statements in accordance with generally accepted accounting principles and maintain recorded accountability for assets and liabilities.

All business transactions that employees, contractors and directors have participated in must be properly authorized, properly recorded and supported by accurate documentation in reasonable detail. Audit programs must be established and maintained to ensure conformance with the requirements of this Policy and the associated legislative and regulatory requirements.

## **Violations of the Prevention of Corruption Policy**

Violation of this Policy may result in disciplinary action up to and including termination of employment or contract, as applicable.

Actions that violate or appear to violate this Policy must be reported to your leader, HR advisor, the Ethics & Compliance team or through the Integrity Hotline.

Any questions regarding this Policy should be directed to the Vice-President, Government Relations & Sustainability.