



December 9, 2021

## **YEAR END SUPPLIER COMMUNICATION**

*The expectations set out in this letter are equally applicable to the goods and services suppliers of the non-affiliated operated and non-operated entities to which Imperial Oil Limited ("Imperial") and/or ExxonMobil companies in Canada ("ExxonMobil") provide services and this letter is being communicated on our own behalf and as well as on their behalf.*

Imperial and Exxon Mobil Corporation<sup>1</sup> regularly undertakes a thorough review of its business practices and those of its affiliates. As part of the review process, we believe it is important to communicate to our goods and services suppliers our expectations for the proper conduct of business activities with, or on behalf of, Imperial or ExxonMobil. As guided by our long-standing Ethics Policy and other policies of our [Standards of Business Conduct](#), our principal aim is to ensure that we conduct our business in accordance with the very highest standards. In turn, we expect that our suppliers are committed to similar standards. Our standards cover safety, contract awards, personal business behavior, compliance with all applicable laws, adequate internal controls and the proper recording and reporting of all transactions.

As stated in Imperial Supplier Expectations, it is a fundamental expectation that Imperial and ExxonMobil and its suppliers will comply with all applicable laws, and that all financial settlements, reports and invoicing will correctly reflect the business transactions between us. Specifically, we expect compliance with the anti-corruption and competition/antitrust laws of Canada and every other country in which operations are conducted. No person in Imperial or ExxonMobil is authorized to ask your organization to take any action on our behalf which is contrary to applicable law or company policies, including our Anti-Corruption and Competition Law/Antitrust Policies. No Imperial or ExxonMobil employee or supplier is authorized to make an improper payment, including facilitating payments to any employee, official, agent, or instrumentality of any government, commercial entity, or individual in the conduct of Imperial or ExxonMobil activity or business.

Another key standard is our policy on the giving and receiving of gifts and entertainment. Those parties conducting business with, or on behalf of, Imperial and ExxonMobil are

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### **<sup>1</sup> Corporate Separateness Notice**

Exxon Mobil Corporation has numerous affiliates, many with names that include ExxonMobil, Exxon, Esso and Mobil. For convenience and simplicity in this communication, the short term "ExxonMobil" is used in this communication to refer to groups of companies or to specific subsidiaries of Exxon Mobil Corporation. For all of these, word selection may have been based on convenience and simplicity, and may not identify reporting relationships, legal entities, or relationships among legal entities.

Nothing in this material is intended to override the corporate separateness of local entities. Working relationships discussed in this communication do not necessarily represent a reporting connection, but may reflect a functional guidance, stewardship, or service relationship.



expected to exercise good judgment in each case. The provision of gifts and entertainment must not be intended to create an improper advantage. Our employees are restricted from receiving gifts or favors which exceed a nominal value or receiving any extravagant or frequent entertainment from individuals, companies or firms who do business, or seek to do business, with us. Likewise, while we do not envision that any gifts would be made to third parties, you should be equally prudent on the extremely rare occasion you might provide appropriate gifts or entertainment to third parties when conducting business on behalf of Imperial or ExxonMobil. If you have not already done so, please ensure that you adopt adequate safeguards, and that you have in place policies, procedures, and/or controls to ensure your activities related to commercial interactions and interactions with government officials fully comply with applicable anti-corruption laws and the expectations of Imperial and ExxonMobil outlined above.

Imperial and ExxonMobil are committed to respecting human rights, and we expect the same of our suppliers. Our [Supplier Expectations](#) with regards to human rights include conducting operations and business practices, as well as managing activities, in a manner consistent with the following key international human rights frameworks:

- the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work, covering elimination of child labor, forced labor, workplace discrimination, and recognition of freedom of association; and
- the United Nations Guiding Principles on Business and Human Rights (UNGPs) in effect as of 2011.

Imperial and ExxonMobil are committed to a safe, healthy, and productive work environment for our employees, contractor employees and others who access our property, sites, and facilities. Our expectation is that you have and enforce an alcohol and drug program that at a minimum meets the requirements set forth in the agreement. Elements of an acceptable Contractor's program should include, but are not limited to the:

1) Prohibition, while on Company Premises (including off-duty time) of Contractor Personnel use, possession, sale, manufacture, distribution, concealment, or transport of any Prohibited Substance, which would include alcohol and potentially impairing medications used without a prescription or in a manner inconsistent with the prescription or directions for usage, e.g. some Prescription Drugs or over-the-counter medications or herbal medicines.

2) Prohibition of any (1) drug or alcohol-related paraphernalia used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling or otherwise introducing into the human body any Prohibited Substance, (2) paraphernalia or substance used or designed for use to dilute, substitute, or adulterate any alcohol or drug test specimen or to otherwise obstruct the alcohol or drug testing process.



3) Removal of Contractor Personnel from Company Work following non-compliance with any aspect of the Contractor program or the requirements set forth in the alcohol and drug exhibit in the agreement.

4) Commitment to comply with all applicable drug and alcohol related laws and regulations.

Imperial and ExxonMobil expend considerable resources protecting our data, including defending our computer network from the increased risk of sophisticated cyber-attacks and stewarding personal information according to regulatory requirements.

This communication reinforces Imperial and ExxonMobil's expectation that you take appropriate steps to protect information (electronic and hardcopy) and information systems in your control from new and evolving risks of cyber attackers. You should maintain appropriate data protection and cybersecurity measures based on professional guidance and best practices.

If there are circumstances where you suspect information related to Imperial or ExxonMobil is compromised, you should promptly bring such circumstances to our attention. Please contact Imperial or ExxonMobil if you have any suspicions as to whether an email purportedly from us is actually from our company. Also, we request that you regularly train your personnel on cybersecurity, including training to be alert to cybersecurity attacks that rely on personal inattention, such as "phishing" attacks or other suspicious emails containing attachments or links that could potentially compromise computer systems.

More and more countries around the world are adopting data protection or data privacy laws, which regulate the collection and processing of information, including personal information. These laws deal not only with how such information is collected and stored, but also the purpose(s) for which it is used. In addition, in many countries there are also particular restrictions on how personal information is transferred across national borders and to third parties.

Imperial and ExxonMobil are committed to protecting the personal information of its employees, contractors, vendors, customers and other third parties with whom it deals. If you have not already done so, please ensure that you adopt adequate safeguards to keep all personal data used pursuant to your agreement with Imperial and ExxonMobil secure, and that you have controls and tools in place to ensure compliance with applicable data privacy laws.

We also ask you to be alert to the potential for Illegal Information Brokering where persons approach suppliers offering confidential information that is used to obtain business



through corruption of the competitive bidding process. Such practice is illegal and we ask that you report the occurrence of any such incident.

It is your responsibility to communicate the expectations of the above paragraphs to all subcontractors that work for you on Imperial or ExxonMobil projects or sites.

Finally, we expect that all financial data shall be complete and accurately recorded and all invoices to Imperial or ExxonMobil accurately reflect pricing, payment terms, and other provisions as stated in your contract with us.

We are committed that contracts and other awards are made in a fair manner. We encourage you to contact us if you are aware of any practices which fail to meet these standards or if you have any concerns in this regard.

For best awareness and understanding of our business standards, we would appreciate your bringing this communication to the attention of those within your organization who have business contact with us or our affiliates.

Should you at any time have any questions or concerns as to the application of these business standards, please let us know by contacting our Controls Advisor, Frank McGurk at +15874765201 or [frank.w.mcgurk@esso.ca](mailto:frank.w.mcgurk@esso.ca).