

# 2025 Year-end Supplier Communications

The <u>expectations</u> 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 routinely conduct a thorough review of our business practices, as well as those of our affiliates. As part of this ongoing process, we believe it is essential to clearly communicate our expectations to the suppliers of goods and services who work with or on behalf of Imperial or ExxonMobil.

Guided by our long-standing Ethics Policy and the broader framework of our Standards of Business Conduct, we are committed to operating with the highest levels of integrity. In turn, we expect our suppliers to uphold 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.

Imperial and ExxonMobil expect both us and our suppliers will comply with all applicable laws and regulations. Furthermore, all financial settlements, reports and invoicing must accurately reflect the business transactions between us. Specifically, we expect:

- Compliance with the anti-corruption, antitrust and trade laws of Canada, as well as every country in which operations are conducted.
- No individual at Imperial or ExxonMobil is authorized to ask your organization to undertake any action on our behalf that contravenes applicable laws or Imperial or ExxonMobil policies, including our Anti-Corruption, Antitrust and Trade Laws Policy.
- No Imperial or ExxonMobil employee or supplier is authorized to make any 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.

### Gifts and entertainment policy

Another key standard is our policy regarding the giving and receiving of gifts and entertainment. Parties conducting business with, or on behalf of, Imperial and ExxonMobil are expected to exercise sound judgment in every instance. The offering or acceptance of gifts and entertainment must never be intended to secure an improper advantage.

• Our employees are prohibited from accepting gifts or favors that exceed a nominal value, as well as from receiving extravagant or frequent entertainment from individuals, companies or firms that do business, or seek to do business, with us.



- Similarly, while we do not anticipate any gifts being offered to third parties, we expect
  you to exercise equal prudence on the rare occasions when appropriate gifts or
  entertainment may be provided in the course of conducting business on behalf of
  Imperial or ExxonMobil.
- If you have not already done so, please ensure that adequate safeguards are in place, including policies, procedures and/or controls to guarantee that your commercial interactions and engagements with government officials fully comply with applicable anti-corruption laws and the expectations of Imperial and ExxonMobil outlined above.

## Respecting human rights

Imperial and ExxonMobil are committed to respecting human rights, and we expect the same commitment from our suppliers. With regards to human rights in the context of operations, business practices, and activity management, suppliers are expected to conduct their business 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, recognition of freedom of association, and a safe and healthy work environment; and
- The United Nations Guiding Principles on Business and Human Rights (UNGPs) in effect as of 2011.

Imperial expects our suppliers to report its activities under the Fighting Against the Forced Labour and Child Labour in Supply Chains Act (Canada) if applicable.

#### Productive work environment

Imperial and ExxonMobil are committed to a safe, healthy and productive work environment for our employees, contractor employees and others who access Imperial or ExxonMobil property, sites and facilities. Our expectation is that you apply continuous efforts to improve safety, security, health and environmental performance and foster appropriate operating practices and training. Suppliers should 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:

 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-thecounter medications or herbal medicines).



- 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.
- Removal of contractor personnel from company activities following non-compliance with any aspect of the contractor program or the requirements set forth in the alcohol and drug exhibit in the agreement.
- Commitment to comply with all applicable drug and alcohol-related laws and regulations.

It is imperative that, in providing goods and services, you not deal with any entities, organizations, persons, or vessels which may be subject to sanctions or export controls. Should you have any questions about what entities, organizations, persons, or vessels are sanctioned, please consult with a lawyer experienced in such matters.

# Data protection

Imperial and ExxonMobil invest significant resources in safeguarding our data, protecting our computer networks against cyber threats and ensuring that personal information is processed in compliance with applicable data protection laws.

This communication sets out our requirement that you take appropriate steps to protect information (electronic and hardcopy) and information systems under your control against current and evolving cyber risk. You must maintain appropriate data protection and cybersecurity measures consistent with industry best practices and professional standards.

If you become aware of, or reasonably suspect, that information relating to Imperial or ExxonMobil has been compromised, you must notify us without undue delay. Please contact us if you have any suspicions that an email purportedly from Imperial or ExxonMobil is actually from our company. You should also regularly train your personnel on cybersecurity, including awareness of 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 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 impose requirements on the collection, storage, use, and transfer of this information, including restrictions on cross-border transfers and disclosures to third parties.

Imperial and ExxonMobil are committed to protecting its information, including the personal information of our employees, contractors, vendors, customers and third parties we engage.



Accordingly, it is important that you implement and maintain adequate safeguards, policies, and procedures to secure all Imperial and ExxonMobil information, including personal information, handled under your agreement with us and to ensure compliance with all applicable data protection or data privacy laws.

# Use of artificial intelligence

Suppliers may not use Imperial's or ExxonMobil's business information or personal data for the training, fine-tuning, or development of artificial intelligence systems, unless expressly agreed otherwise in a contract. This restriction applies equally to your own suppliers, subcontractors, and service providers. You are responsible for ensuring that any Al tools or services used in connection with our data are properly governed through vendor management processes, including contractual restrictions, risk assessments, and ongoing monitoring. Under no circumstances should Imperial's or ExxonMobil's information be exposed to Al systems in a way that could lead to disclosure, misuse, or improper incorporation into Al training datasets.

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 any such incident.

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

#### Financial data

Finally, we expect that all financial data is 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 to ensuring contracts and other awards are made in a fair manner. We encourage you to contact us if you are aware of any practices that fail to meet these standards or if you have any other concerns.

For awareness and understanding of our business standards, we ask that you bring 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, Jimena Turanza at jimena.turanza@exxonmobil.com.

\* Alternatively, you may call the Imperial Oil corporate "hot line" at 1-877-390-5373.