



GIBSON ENERGY INC. LABOUR & HUMAN RIGHTS POLICY

1. Purpose

The board of directors (the "**Board**") of Gibson Energy Inc. (along with its affiliates, "**Gibson**" or the "**Company**") believes it is our duty to operate in a responsible and ethical manner, and to demonstrate respect and care for all people that may be affected by our operations and activities. This Labour & Human Rights Policy (the "**Policy**") sets out Gibson's commitment to comply with all applicable employment and labour laws and regulations. Gibson expects its directors, officers, employees, partners, contractors, consultants, and suppliers (collectively "**Personnel**") across operations in all geographic locations to operate in accordance with these standards in their conduct of business for and on behalf of the Company. This Policy is overseen by the Board and the Sustainability and ESG Board Committee.

2. Commitments

Gibson endeavors to conduct its business in conformance with internationally recognized guidelines on labour rights and human rights. Our commitments are informed by several guidelines including the United Nations (UN) Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights and International Labour Organization (ILO) conventions such as the ILO Declaration on Fundamental Principles and Rights at Work. We also recognize the ambition of the UN Sustainable Development Goals (SDGs) in addressing global challenges, including universal respect for human rights.

Our commitments include but are not limited to:

- Prohibiting all forms of child labour and forced labour and ensuring employment of Personnel who meet the applicable minimum legal age requirement to work in the country or countries in which we operate
- Respecting the rights of all people including minority groups and women, as well as the rights and traditions of Indigenous people and local communities
- Ensuring zero tolerance of discrimination or harassment against current or potential Personnel or those with whom Gibson conducts business based on gender, ethnicity, race, disabilities, age, sexual orientation, religion and family status (for further information, please refer to Gibson's Diversity & Inclusion Policy and Respectful Workplace Policy)
- Providing a safe, healthy and hazard-free working environment for its Personnel and conducting operations in an environmentally responsible manner in accordance with applicable laws, regulations and industry standards (for further information, please refer to Gibson's Operations Policy)
- Ensuring appropriate working hours, overtime and days of rest and providing a fair and living wage to all employees
- Respecting the right of workers to choose whether to lawfully and peacefully form or join trade unions of their choosing and to bargain collectively

3. Compliance and Enforcement

Gibson ensures awareness of this Policy by providing it to all new Personnel as well as making it available on our external and internal websites. The Policy must be reviewed by all employees on an annual basis to confirm full compliance with its terms.

All Personnel have the responsibility, and in some instances, the obligation, to report any violations of law, rules, regulations, or actions that violate this Policy. In reporting potential non-compliance, employees, contractors and consultants should, if appropriate, first raise the issue with their direct Supervisor, Manager or Business Unit Executive, who shall consult with Gibson's Legal or Human Resources department to determine whether an incident of non-compliance has occurred and/or continues to occur and to recommend measures available or appropriate under the circumstances. Directors and officers shall consult directly with Gibson's Legal or Human Resources department.

If the individual is of the view that it would be more appropriate under the circumstances to report the potential non-compliance to a higher level or it is impractical for the individual to report the potential non-compliance as set forth in the paragraph above (including partners, suppliers and any other types of Personnel who do not have access to a Gibson Supervisor, Manager or Business Unit Executive), then that individual may contact Gibson's Chair of the Board and Chair of the Audit Committee by contacting the Gibson EthicsLine through its telephone-based reporting line or website based reporting system. All individuals who report non-compliance to the Gibson EthicsLine have the right to remain anonymous and reporters will not need to identify themselves. Once an individual has reported potential non-compliance to the Gibson EthicsLine a report will be created and provided by the Gibson EthicsLine directly to Gibson's Chair of the Board and Chair of the Audit Committee. Any requests to remain anonymous will be respected and no retaliatory action will be taken against an individual for providing information in good faith. For further information, please refer to Gibson's Whistleblower Policy.

4. Board Approval

This Policy has been approved by the Board on February 22, 2021.