



INDIGENOUS PEOPLES POLICY

1 OVERVIEW

PURPOSE

Gibson Energy Inc., along with its affiliates (collectively, “Gibson”, the “Company”, “We”) strives to establish, maintain, and strengthen meaningful mutually beneficial relationships with the Indigenous Peoples in Canada and the United States (U.S.) and their respective leadership and communities, built on a foundation of trust, respect and reconciliation. Gibson’s Indigenous Peoples Policy (the “Policy”) provides a consistent approach to the Company’s relationships with Indigenous Peoples and outlines Gibson’s responsibilities and commitments for embedding the principles of Truth and Reconciliation and the spirit and intent of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) into Gibson’s culture, decision-making, operational and business practices at all levels of the organization.

Underlying the responsibilities and commitments outlined in this Policy are Gibson’s *Indigenous Relations Guiding Principles*, as follows:

- We recognize that Indigenous Peoples have Aboriginal and Treaty rights that are affirmed and protected by the Constitution of Canada and distinct rights as protected by U.S. laws;
- We recognize and respect the importance and diversity of Indigenous Peoples’ unique histories, cultures, traditions, protocols, values, beliefs, perspectives, Traditional Land use, and connection to the land;
- We acknowledge UNDRIP in the context of existing Canadian and U.S. law and governments in both countries roles in preserving the rights of Indigenous Peoples and their communities;
- We will approach all Indigenous engagement early in the life cycle of a project and in a meaningful and transparent manner, providing project-specific or company information to Indigenous communities openly and concisely;
- We will proactively listen to Indigenous communities’ knowledge and priorities, and where appropriate, incorporate these perspectives into our project planning, design and execution;
- We will commit to seek collaborative opportunities with Indigenous Peoples and their communities to identify and provide stable funding for short and long-term community investment initiatives that align with both Indigenous community interests and Gibson’s business objectives while contributing to economic reconciliation; and,
- We will foster an understanding of the unique histories and cultures of Indigenous Peoples, in order to create meaningful relationships between Gibson and Indigenous Peoples and their communities.

Our vision is to build strong, meaningful connections and support the growth of Indigenous communities through a foundation of mutual respect and understanding of local communities, opportunities for economic participation and employment and working towards common goals.

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Gibson recognizes the social, economic and cultural rights of Indigenous Peoples and believes that Indigenous Peoples and communities affected by our activities should be able to benefit from opportunities such as community investment and engagement, business development, economic inclusion, employment, education and training. We acknowledge the importance of the 94 Calls to Action from the Truth and Reconciliation Commission of Canada and respect the right to Free, Prior and Informed Consent as an inherent right. Gibson is committed to playing a role in advancing reconciliation, encouraging awareness and understanding, implementing the principles of UNDRIP and following the commitments and responsibilities set out in this Policy.

SCOPE

This Policy applies to Gibson's directors, officers, employees and contractors (collectively "**Personnel**"). Personnel are also responsible for promoting the beliefs and principles underlying this policy in partnerships and joint ventures. This Policy applies to our relationships with Indigenous Peoples in Canada and the U.S. and their respective leadership and communities.

2 COMMUNITY

ENGAGEMENT

Gibson recognizes Indigenous Peoples as rightsholders who have a distinct relationship to the land, with legal rights as self-governing entities of the people who were the original inhabitants of our continent. We are committed to following a tiered community engagement program for all Indigenous communities where Gibson's operations are within their traditional territory. We will approach any engagement with Indigenous Peoples or communities with early, respectful and transparent conversations and encourage two-way dialogue to seek their knowledge and perspective, proactively address questions and mitigate any potential concerns. Additionally, through ongoing engagement, Gibson aims to incorporate Indigenous perspectives and traditional knowledge into our business decisions and planning, where possible.

INVESTMENT

Contributing to our community is a fundamental part of Gibson's corporate culture as we believe that the areas where we live and operate should share the benefits of our success. Through Gibson's Community Investment Program, we aim to invest in initiatives that have a meaningful impact and align with both Indigenous community interests and Gibson's focus areas. We believe this offers an important avenue for supporting Indigenous Peoples and communities surrounding our operations and can contribute to fostering mutually beneficial relationships and advancing economic reconciliation.

RELATIONSHIP BUILDING

We are committed to building positive, long-term and mutually beneficial relationships with Indigenous Peoples and communities impacted by Gibson's operations built upon a foundation of trust, respect and open and honest communication. By nurturing meaningful relationships, we will enable our mutual success through continuing to identify and implement opportunities for community engagement and investment, economic reconciliation and workforce development.

3 ECONOMIC RECONCILIATION

BUSINESS DEVELOPMENT

The Company believes that pursuing mutually beneficial business development opportunities will support our journey towards economic reconciliation and reducing socioeconomic barriers. For Gibson, responsible business development considers Indigenous Peoples interests regarding the

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opportunities and impacts of energy development on communities and on their traditional and current uses of lands and resources. We commit to investigating opportunities to support impactful outcomes for Indigenous Peoples and communities by incorporating Indigenous perspectives into Gibson's business development projects, where relevant. We will also consider opportunities to market production and commodities from Indigenous companies and communities.

PARTNERSHIPS

When building relationships with Indigenous partners, we understand the importance of trust through open and honest communication. Gibson will identify potential near- and long-term partnership opportunities aligned with the aspirations of Indigenous communities, including potential joint ventures and equity ownership in assets, where possible. The potential for Indigenous economic inclusion through partnerships will be considered during project development.

SUPPLY CHAIN MANAGEMENT AND PROCUREMENT

Gibson believes in the importance of supporting fair and equal access to supplier and contracting opportunities for Indigenous communities and their members and we are committed to Indigenous economic inclusion in our supply chain. Through our Indigenous Procurement and Vendor Strategy, we will work closely with Indigenous businesses and communities in proximity to our operations and assets to identify potential procurement opportunities and implement Indigenous contract management procedures to ensure internal commitment and accountability. Through our Request for Proposal (RFP) process, we will engage directly with Indigenous vendors, as well as assess the Indigenous content of other RFP proponents based on a set of measurable, objective and well-defined standards.

4 WORKFORCE DEVELOPMENT

INCLUSION

Gibson is committed to fostering a respectful and inclusive workplace that reflects the communities where we live and work. Our success reflects the quality, skills and experience of our employees, who all have a responsibility to support and foster a diverse and inclusive culture. Our strategy focuses on four key elements for the successful representation and inclusion of Indigenous Peoples in Gibson's workforce; Attraction, Retention, Development and Engagement. This will be supported by a commitment from leadership at all levels of the organization as well as communications, policies, procedures, programs and partnerships to support the strategy.

EMPLOYMENT

Gibson aspires to be an employer of choice for Indigenous Peoples in Canada and the U.S. and aims to continue increasing the Indigenous representation in our workforce as well as in our summer student programs. We recognize that Indigenous Peoples and communities should have the opportunity to benefit from energy development through employment opportunities. This aspiration requires a solid foundation of Indigenous knowledge, an organizational focus on inclusive behaviours, Indigenous representation throughout the Company and evidence-based engagement practices. Gibson is committed to following a formal program to guide the increasing participation of Indigenous Peoples in the workplace. The strategy will set the framework for employment practices and guide the Company's future decisions to facilitate the development of a workforce representative of the areas where we do business.

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EDUCATION

Gibson is committed to supporting educational opportunities to benefit Indigenous Peoples, as well as providing Indigenous awareness training to all our employees.

By supporting Indigenous education, training and scholarship opportunities, we can help equip Indigenous Peoples and communities with the capacity and skills to benefit from various opportunities and help contribute to industry needs. Additionally, we will encourage opportunities for Indigenous Peoples to increase their understanding of the energy industry and become valuable participants in a just and equitable energy transition.

All Gibson Personnel must complete Indigenous Peoples Awareness Training to help build a solid foundation of cultural and historical awareness within our company and among our workforce. Indigenous awareness is a key component of reconciliation that enhances understanding and communication, dispels myths and misconceptions, addresses stereotypes and biases and helps to create more inclusive work environments. By providing this training, we will equip Personnel with a foundational understanding that will enable us to continue a path forward for Indigenous relations, reconciliation actions and fostering inclusion.

5 COMPLIANCE

Gibson ensures awareness of this Policy by providing it to all Personnel as well as making it available on our external and internal websites. Personnel are required to comply with all aspects of this Policy and disciplinary actions may be taken against anyone who violates this Policy. Violations can be reported by Personnel or community members in accordance with Gibson's *Whistleblower Policy* through a confidential and anonymous process. The Company's *Whistleblower Policy* outlines how a notification or complaint will be treated once it is made and includes whistleblower protection for complainants making an anonymous complaint. Gibson will not allow retaliation for reports made lawfully in accordance with the Company's *Whistleblower Policy*.

6 APPROVAL

This Policy was approved by the Company's President & Chief Executive Officer on May 23, 2023. Gibson commits to reviewing the Policy at least every two years and will provide regular, objective reporting on our progress.