



SUSTAINABILITY POLICY

1 OVERVIEW

PURPOSE

Gibson Energy Inc., along with its affiliates (collectively, “Gibson”, the “Company”, “We”) recognizes our role and responsibility in shaping a better tomorrow. We believe that by further embedding sustainability and environmental, social and governance (“ESG”) considerations into our culture, business decision-making and operations, we can generate sustainable, long-term value for our stakeholders and maintain the resiliency of our business. This *Sustainability Policy* (the “Policy”) guides Gibson’s commitment to operating sustainably, including being a responsible steward of the environment and good corporate citizen.

This Policy is overseen by the Board of Director’s Sustainability and ESG Committee. This Policy is supported by and should be read in conjunction with the Company’s other ESG-related policies including, but not limited to: *Code of Conduct and Ethics, Supplier Code of Conduct and Ethics, Labour and Human Rights Policy, Anti-Bribery and Anti-Corruption Policy, Indigenous Peoples Policy, Diversity and Inclusion Policy, Respectful Workplace Policy and Operations Policy.*

SCOPE

This Policy applies to all aspects of Gibson’s business and operations, guiding conduct and practices across the organizational landscape and is subject to regular reviews to ensure continued alignment with, among other things, industry best practices.

2 COMMITMENTS

Gibson is committed to conducting its business with the highest standards of governance and ethical behavior and in compliance with all laws, regulations and requirements that are applicable wherever Gibson operates. We aim to align with internationally recognized sustainability frameworks and guidance. Our sustainability commitments and practices are informed by several guidelines including the United Nations (UN) Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organization (ILO) conventions and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We also acknowledge the aspirations set forth by the United Nations Sustainable Development Goals (SDGs) in addressing global challenges to achieve a more sustainable future.

Guided by the three themes of our sustainability strategy - Delivering Energy Responsibly, Working Together and Operating with Excellence - our commitments include, but are not limited to:

Delivering Energy Responsibly

- Supporting the transition to a lower carbon future and addressing climate change, while continuing to help sustainably meet global energy demand by embedding climate-related considerations into our business decision-making processes and exploring energy transition opportunities in alignment with our strategic objectives and stakeholder interests;

SUSTAINABILITY POLICY

- Pursuing opportunities to reduce emissions, progressing towards our Net Zero by 2050 commitment, and using natural resources and energy more efficiently;
- Operating in an environmentally responsible manner to minimize adverse impacts to the environment in accordance with all applicable laws, regulations and industry standards, and through our commitment to environmental management, monitoring of performance and creating environmental awareness;
- Minimizing biodiversity impacts on local species by utilizing a mitigation hierarchy approach and implementing management plans and mitigation strategies as required;
- Working with suppliers and vendors who uphold our values, and mitigating risks across our supply chain through ongoing engagement and incorporation of ESG considerations in our supplier selection and prequalification processes;

Working Together

- Attracting, retaining, developing and engaging a high-performing and agile workforce through quality, value-added practices and programs and supporting the well-being and professional development of our people;
- Fostering a diverse, respectful, and inclusive workforce that reflects the communities where we live and work and ensuring zero tolerance of discrimination or harassment against current or potential personnel or those with whom Gibson conducts business based on gender, ethnicity, race, cultural background or country of origin, disabilities, age, sexual orientation, religion and/or family status;
- Conducting meaningful engagement with stakeholders through early, respectful and transparent conversations to build positive, long-term relationships;
- Establishing, maintaining and strengthening mutually beneficial relationships with Indigenous Peoples and their respective leadership and communities built on trust, respect and reconciliation;
- Supporting the communities where we live and operate to ensure responsible corporate citizenship through our Community Investment Program and employee giving aligned with our Company's values and strategy;

Operating With Excellence

- Providing a safe, healthy and hazard-free working environment for our personnel and continuously improving our safety performance, enhancing our safety culture and working towards our Mission Zero aspiration by ensuring the safety and protection of people, the environment and our assets;
- Prioritizing Emergency Management across the Company through a systematic approach to effectively prevent, mitigate, prepare for, respond to, and recover from all incidents and emergencies;
- Ensuring robust cybersecurity measures are in place to safeguard our data and maintain the dependability of services for our stakeholders, including regularly testing our ability to prevent, detect, respond to and recover from potential threats;

SUSTAINABILITY POLICY

- Setting and working towards measurable and meaningful ESG goals and targets to drive continuous improvement;
- Communicating our sustainability and ESG performance and progress through regular and transparent reporting to address the expectations of our stakeholders.

3 BOARD APPROVAL

This Policy was approved by the Board of Directors on February 20, 2024 upon recommendation by the Board's Sustainability and ESG Committee.