

A photograph of three workers in safety gear (hard hats, high-visibility clothing) standing on a rooftop platform, looking at a tablet. The scene is set against a backdrop of a large industrial building with corrugated metal siding and a clear sky. The workers are wearing blue and brown jumpsuits with reflective yellow stripes. The platform has a dark, textured surface and a metal railing. Long shadows are cast across the platform, suggesting it is either early morning or late afternoon. The overall tone is professional and industrial.

# The Way We Do Business

Suncor's Standards of Business Conduct



# Table of contents

## Our code

About this resource	4
Acting with Integrity website	5
Message from Rich Kruger	6

## Living our values

Our values	8
Our responsibility	9
Making the right decision	10
Speak up	11
No retaliation	11
Leading with integrity	12
Respectful work environment	13

## Sharing information

Confidential information	15
Communicating with the public	17
Social media	18

## Acting with integrity

Conflicts of interest	20
Gifts and entertainment	21
Preventing improper payments	22
Fair competition	24
Trading in securities	25
Accounting and financial reporting	27
Political and charitable activities	28
Using Suncor assets	29

## Resources

Tools and contacts	32
The Suncor Integrity Hotline	33

## Our purpose

**To provide trusted energy  
that enhances people's  
lives, while caring for each  
other and the earth**

# Our code

- > About this resource
- > Acting with Integrity website
- > Message from Rich Kruger



# About this resource

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources



*The Way We Do Business* is a summary of all of Suncor's Policy Guidance and Standards (PG&S) that make up our Standards of Business Conduct Code. By reading this resource, you will get the guidance you need to handle most daily work situations.

This resource sets out the basic rules, standards and behaviours that all employees, independent contractors and members of our Board of Directors must follow. Think of it as a guide to help you navigate matters that are important to Suncor so we can maintain the confidence of all of our stakeholders, including customers, shareholders, suppliers and the communities where we do business.

And while our Code has been designed to support us to do our work to the best of our abilities, it is not intended to be a comprehensive guide to all responsibilities under the law that apply to our roles at Suncor. With a company as big and diverse as ours, this is just not possible. It should, however, provide us with the basic principles to help resolve any ethical issues we may face.

**Throughout this resource, you will see references to our Code. This refers to our Standards of Business Conduct Code which encompasses 12 separate Policy Guidance and Standards.**

**There are a number of separate policies that make up our Code:**

- [Accounting Reporting and Business Control](#)
- [Communications to the Public](#)
- [Competition](#)
- [Conflict of Interest and Confidentiality](#)
- [Directors, Officers, Trustees and Board Members of Outside Organizations](#)
- [Disclosure of Material Information and Trading in Shares and Securities](#)
- [Equal Opportunity and Inclusion policy](#)
- [Respectful Workplace Standard](#)
- [Prevention of Improper Payments](#)
- [Reporting Insiders](#)
- [Trade Relations](#)
- [Trading Blackouts for Restricted Persons](#)

# Acting with Integrity website

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources



Acting with  
Integrity



Click the Acting with Integrity button found throughout this resource for additional information. The website consists of a series of compliance and ethics-themed episodes that feature humorous videos accompanied by helpful articles and related content. Clicking the Acting with Integrity button will take you to the episode for the corresponding topic.

## Message from Rich Kruger

Suncor's vision is to be Canada's leading energy provider respected for our people, performance, sustainability, and relationships that together create value-added contributions to society, communities, customers, and shareholders. Strong business results are fundamental to achieving this vision. Equally important is how we achieve our results. Specifically, our commitment to adhering to the highest standards of business conduct in all we do. Our legal obligations, reputation as a company and the trust of our stakeholders depend on the actions and behaviours of all of us.

Consequently, each of us is required to review and confirm our understanding of the company's Standards of Business Conduct Code on an annual basis. We are also expected to apply the standards in our work. If you have questions on any aspect of our Conduct Code or if you believe it is being violated by anyone, it is essential that you talk to your leader, the Law group, or contact the Integrity Hotline. Thank you for your commitment to the company and your commitment to adhering to the highest standards of business conduct.



**Rich Kruger**  
President and Chief Executive Officer



# Living our values

- > Our values
- > Our responsibility
- > Making the right decision
- > Speak up
- > No retaliation
- > Leading with integrity
- > Respectful work environment



# Our values

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources

Our values are our guiding principles. They are people-focused and guide the way we strive to treat one another as well as those we work with outside the company. They define the way we're expected to show up at work, each and every day.

## Suncor's values are:

### Safety above all else

Safety above all else is unconditional! If it isn't safe, we don't do it. We watch out for each other and have the courage to act so our workplace, our homes and our communities are healthy and safe.

### Stronger together

We are stronger together because this is what allows us to achieve amazing outcomes. We work hard to build trust with one another and our stakeholders, be inclusive and use the experience of others in a positive way.

### Operational discipline

Operational discipline is foundational to how we run our business. We use consistent standards, practices and behaviours to always improve our performance as we aspire to do the right thing, the right way, every time to get great results.

### Curiosity and lifelong learning

Curiosity and lifelong learning will help us grow, to challenge the status quo, and to learn from and support each other to make the world a better place. We listen, we share, we stretch and we adapt.

### Act with integrity

We act with integrity in everything we do. We do what we say we'll do and approach our responsibilities by being open, honest, respectful and transparent.





# Our responsibility

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources



Every one of us has a personal responsibility for ensuring that our day-to-day business is conducted in a fair, honest and ethical manner.

We aren't expected to know the details of all the laws that affect our business, but we are responsible for living our Suncor values and understanding the policy guidance and standards relevant to our roles, work area and geographic location. This will help us recognize potential risks and know when to seek advice.

## BOTTOM LINE

Employees and independent contractors – complying with the Code is a condition of employment or your contract with Suncor. Failure to do so may result in serious consequences, including termination.

# Making the right decision

Table of contents

Our code

Living our values

Sharing information

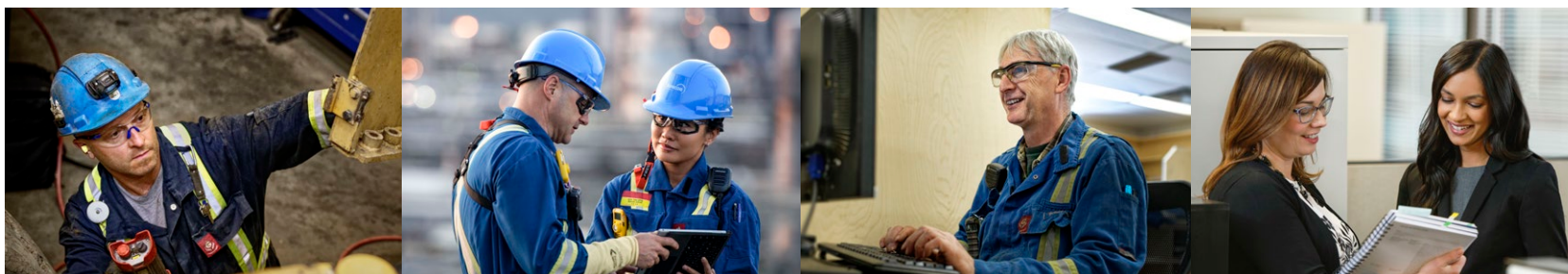
Acting with integrity

Resources

Ethical decision-making starts with good judgment and common sense. Before taking action in a situation, we should ask ourselves these questions:

- Is anyone's life, health or safety, or the environment endangered by this action?
- Is it legal?
- Does it feel fair and honest?
- Does it compromise trust or integrity?
- Could I justify it to the public?
- What would I tell my close friend to do in a similar situation?

Remember these steps to compliance:



## Ask

**Ask** yourself, "What specifically am I being asked to do? Does it seem unethical or improper? How would I feel about this action if I read about it in the newspaper?" Use judgment and common sense. If something seems unethical or improper, it probably is.

## Clarify

**Clarify** your responsibility and role. It will help to collaborate and get others involved to discuss and resolve the problem.

## Review

**Review** the relevant [policy guidance and standards](#) to learn more about Suncor's approach to compliance and whether there are any specific steps you need to take.

## Discuss

**Discuss** the problem with your leader or Legal Affairs. They may be more knowledgeable about the particular situation and able to assist in decision-making.



# Speak up

[Table of contents](#)[Our code](#)[Living our values](#)[Sharing information](#)[Acting with integrity](#)[Resources](#)**Acting with Integrity**

We all share a responsibility to report potential violations of our Code. Speaking up helps fix the problem and protects our colleagues and Suncor. Remember, no one has to face ethical challenges alone as there is always someone who can help. If you suspect illegal or unethical behaviour or believe that our Code is being violated, raise your concern with your leader or one of the contacts listed under Resources. Your concerns will be taken seriously and investigated.

## No retaliation

We do not tolerate retaliation of any kind. If you raise a concern, your confidentiality will be protected to the greatest extent possible and Suncor will not penalize or discriminate against anyone who provides information in good faith relating to an activity they believe is illegal or contrary to Suncor policy. Although all forms of retaliation are prohibited, if you or someone you know believes that they have been negatively impacted by speaking up, reach out to one of the contacts listed under Resources.



# Leading with integrity

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources

**Our Key Behaviours** – Lead the Way and Execute with Operational Discipline – require leaders to model the values and culture that we expect of everyone in the organization. That means, if you are a leader at Suncor, you have additional responsibilities under our Code:

**Lead the way** – the best way to instill ethical behaviour is to model acting with integrity every day. Actions speak louder than words, so be a positive role model by consistently and authentically demonstrating our values. Consider reinforcing our Code with your team by occasionally sharing a Code-related topic at a team meeting (check our [Acting with Integrity website](#) for resources).

**Execute with operational discipline** – use the [five operational discipline behaviours](#) to help you to understand and respond to any issues or concerns about the Code raised by your team. Acknowledge your team members when they demonstrate our operational discipline behaviours as they bring issues or concerns forward.

## Foster a supportive environment

Acting with  
Integrity



Have an open door policy where team members feel welcome to share their concerns. Never retaliate or permit retaliation against anyone who has raised an issue or concern about our Code. Retaliation can take the form of intimidation, bullying or exclusion, so be aware and work closely with our subject matter experts to ensure that everyone who raises a concern is appropriately supported during the resolution process.

## BOTTOM LINE

Always set a great example and if a team member has a question or raises a concern, engage the proper subject matter experts from Human Resources, Corporate Security or Legal Affairs right away. Leaders aren't expected to solve ethical issues by themselves, so collaborate with our subject matter experts to ensure that the issue is handled respectfully and consistently with our policies.





# Respectful work environment

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources

Acting with  
Integrity



We are committed to a work environment where everyone feels safe and valued for the diversity they bring to our business. We treat each other with respect and do not tolerate harassment or any threats or acts of violence in the workplace.

Harassment is distinguishable from everyday social interactions that are part of a normal, vibrant workplace. Harassment generally involves behaviour that demeans, humiliates or embarrasses a person. This could include actions (touching or pushing), comments (jokes or name-calling) or visual displays (posters or cartoons) that could be perceived as insulting or intimidating or which otherwise create an uncomfortable or threatening work environment. Harassment can also occur online or through social media and may take the form of inappropriate emails, texts and social media posts.

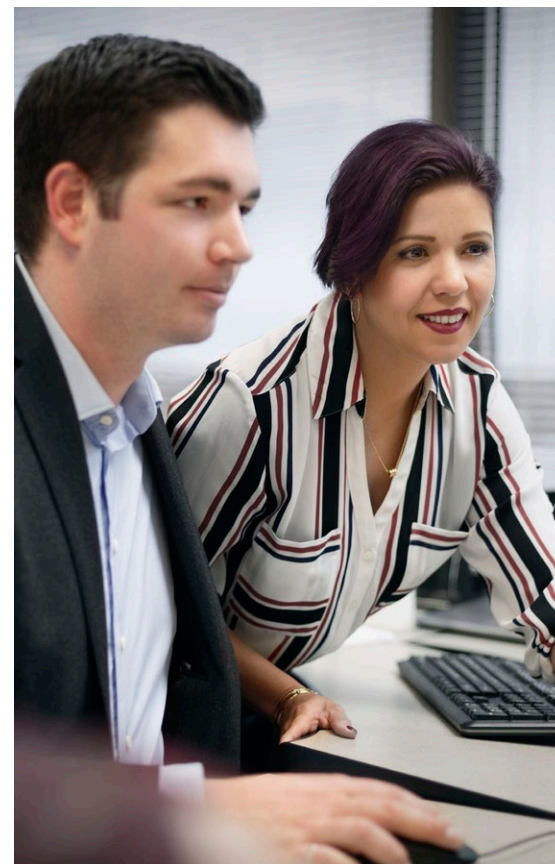
We also do not tolerate any acts of violence or threatening behaviour in the workplace. Violence includes obvious physical acts, such as hitting, shoving or kicking but also includes any threat or intimidating behaviour.

If you have witnessed workplace harassment or violence, speak to your leader or your Human Resources representative. Suncor takes every report of workplace harassment and violence very seriously and has processes in place to address these situations.

## BOTTOM LINE

Never participate in conduct that creates an uncomfortable situation or hostile work environment such as inappropriate comments, jokes, intimidation, bullying or unwanted physical contact.

Visit the [Standards of Business Conduct](#) site for more information.



# Sharing information

- > Confidential information
- > Communicating with the public
- > Social media



# Confidential information

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources

Acting with  
Integrity



Information is one of Suncor's most valuable assets and we take care to protect our confidential information from disclosure.

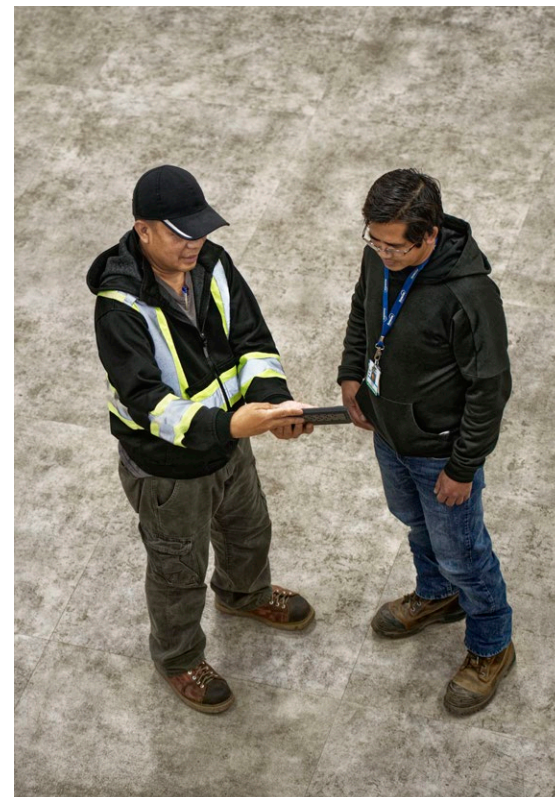
Confidential information includes proprietary, technical, business, financial, joint venture, supplier and customer information that is not publicly available. Safeguard that information by only discussing it in non-public settings and keeping confidential documents stored in a secure location. Also, if you are travelling abroad for work, follow Corporate Security's instructions on storing confidential information on your electronic devices or discussing sensitive matters on your cell phone to the extent directed.

Similarly, confidential information that is owned by others that we may have access to at Suncor cannot be used to personally benefit anyone. Proprietary information belonging to others is protected by contractual limitations that must be carefully observed. Give this information the same protection against unauthorized disclosure and use as confidential information belonging to Suncor.

## BOTTOM LINE

Before sharing our confidential information with an external party, make sure you check with your leader first. Also, if you're contemplating sharing our confidential information with a Suncor supplier, contractor or consultant, make sure you understand our agreement with that third party and confirm that our information will be appropriately protected.

[Continued on next page >](#)



## Confidential information (cont'd)

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources

Acting with  
Integrity



### Personal information

We collect, use and store personal information about our employees, customers, suppliers, associates and others in the course of our business activities (such as names, addresses, etc.). The collection, use and disclosure of personal information is subject to strict privacy laws.

#### BOTTOM LINE

If you have access to personal information in your job, make sure you understand and comply with our Personal Information Privacy PG&S.

### Intellectual property

Intellectual property includes trade secrets, inventions, technology, patents and trademarks that we develop through continuous improvement activities, operations technology development and strategic projects. We protect Suncor's intellectual property as our rights can be permanently lost if we fail to appropriately secure those assets.

#### BOTTOM LINE

Consult with your leader and Legal Affairs before agreeing to receive or disclose any intellectual property. Also talk to your leader, your Communications Business Partner and Legal Affairs before disclosing any intellectual property in a public forum, such as at an industry conference.

Visit the [Standards of Business Conduct](#) site for more information.



**Intellectual property assets and rights enable Suncor to retain industry leadership and derive competitive value from our continued investment in innovation.**

# Communicating with the public

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources



Securities laws generally require that all investors have equal access to information that may affect investment decisions and that material information is promptly and generally disclosed to the public.

To ensure that information about Suncor is communicated in accordance with these laws, only a few people at Suncor are authorized to speak on the company's behalf. If you receive an inquiry from the media, a member of the investment community or other members of the public and you are not a designated spokesperson, make sure to refer the inquiry to your Communications team.

Also, if you are asked to make a public presentation on behalf of Suncor, contact your Communications team beforehand.

## BOTTOM LINE

Unless you are a designated spokesperson, never issue communications on Suncor's behalf or respond to questions about Suncor from the media, members of the investment community or other members of the public. Refer all inquiries to our Communications group for follow up.



# Social media

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources

Acting with Integrity



Just as we need to be careful when sharing Suncor information through face-to-face interactions, phone calls and email, we also need to consider our actions on social media. Given social media's instantaneous reach, a post or tweet could affect our reputation or share price with the click of a button.

Whenever we participate in an online conversation about Suncor or our industry, we must identify ourselves as a Suncor employee or independent contractor. This reinforces transparency, credibility and our responsible use of social media. It is also important to note that our opinions are our own and not the opinions or views of Suncor. Posting anonymously or asking friends or family to post on our behalf is not appropriate.

## BOTTOM LINE

Careful online communication is the key. Consider how online communication may be interpreted by a third party and follow these principles:

- **Be honest** – identify yourself as a Suncor employee or independent contractor when posting on social media about Suncor or industry matters
- **Be responsible** – don't disclose or post confidential Suncor information. If you aren't sure whether something can be shared externally, talk to your leader
- **Be respectful** – ensure your comments are respectful of your coworkers and our customers, partners and competitors

Visit the [Standards of Business Conduct](#) site for more information.

**Q: I work at a Suncor operating facility and today we experienced a disruption that caused some unexpected flaring. The incident might also result in some unplanned facility downtime. Can I share what happened on social media?**

**A:** No. Never share information about operational incidents, disruptions or potential downtime. Even a single tweet or post about an operational issue could have unintended consequences.

# Acting with integrity

- > Conflicts of interest
- > Gifts and entertainment
- > Preventing improper payments
- > Fair competition
- > Trading in securities
- > Accounting and financial reporting
- > Political and charitable activities
- > Using Suncor assets

# Conflicts of interest

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources

Acting with Integrity



A conflict of interest is when our personal interests conflict with Suncor's interests. It can also occur when personal interests influence, or even appear capable of influencing, the decisions made in our jobs. In the interests of transparency and full disclosure, we need to immediately report any situation that may create a conflict of interest.

**Avoid any situation where you improperly benefit, or appear to improperly benefit, from company business decisions or knowledge acquired at Suncor.**

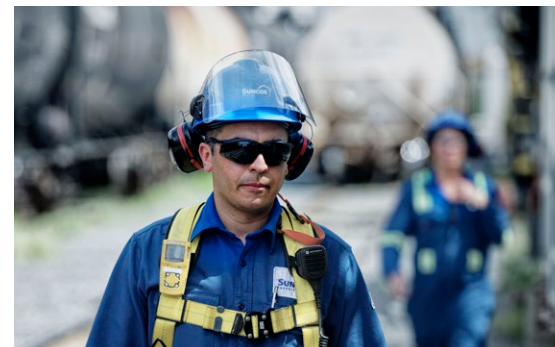
**The most common situations that could give rise to conflicts of interest are:**

- Accepting gifts, entertainment or favours from suppliers
- Ownership of, employment by, or substantial personal or family financial interest in another company that is a customer, supplier or competitor of Suncor
- Sitting on the board of directors of a Suncor customer, supplier or competitor
- Conducting Suncor business with a firm owned or controlled by a Suncor employee, a friend or a family member
- Spending time on outside business or other interests to the point that it interferes with our ability to perform our job

## BOTTOM LINE

Each situation must be assessed on its own facts. "Disclose and discuss" - talk to your leader about circumstances that could be perceived as a conflict of interest. Immediate, full and open disclosure creates an opportunity to address potential conflicts before any problems arise.

Visit the [Standards of Business Conduct](#) site for more information.



**Q: We need to hire a firm to facilitate our next training workshop. We are spending a lot of time looking for the right one. We could save Suncor a lot of time by hiring my brother's firm, as I know they'll do a good job. Can I hire my brother's firm?**

**A:** No, this situation creates a potential conflict of interest between your desire to help your brother and your objectivity in selecting the most competitive supplier. Disclose this conflict to your leader and withdraw from the selection process so your brother's firm may still compete for the work fairly.



# Gifts and entertainment

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources

Acting with Integrity



Gift-giving customs vary around the world but one principle is clear – the exchange of gifts cannot compromise, or appear to compromise, our ability to make objective and fair business decisions.

## BOTTOM LINE

Follow these principles when exchanging gifts and entertainment:

- The benefit should be of token value
- We could easily, and do periodically, reciprocate
- The exchange occurs infrequently
- The exchange should not create a sense of obligation
- Never offer or accept gifts of cash, cash equivalents (e.g.: gift cards) or securities, or solicit gifts or favours of any kind
- Never exchange gifts or entertainment of any kind during a sensitive time such as a procurement process or contract negotiation
- Inappropriate gifts received should be returned to the donor
- Perishable gifts may be donated to a charity and the donor notified

## What is acceptable?

Business lunches, the exchange of modest items between business associates, presentation of small tokens of appreciation at public functions or inexpensive mementos are generally acceptable.

**The point is this:** If you are unsure whether an offer of a gift or entertainment is appropriate, talk to your leader.

Acting with Integrity



You may be part of a business unit or function where more detailed rules apply to the exchange of gifts and entertainment. If you work in Projects, Supply Chain Management or Field Logistics, additional [rules](#) apply to you.

**Q: A Suncor supplier invited me to a sporting event. The tickets are expensive and the cost of the overall evening would be significant. What should I do?**

**A:** Talk to your leader.

Consider whether there are any procurement processes or contract negotiations underway involving the supplier that should impact your decision. If there are, you should decline the invitation. Also check whether your group has any guidelines that specify the value of the gifts and entertainment you can accept. Then decide together with your leader what to do.

Visit the [Standards of Business Conduct](#) site for more information.

# Preventing improper payments

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources



No matter where we operate in the world, we are committed to ensuring that our business dealings are fair, honest and ethical. That means being accountable for always conducting business free of corruption. Corruption damages the reputations of everyone involved – including the countries where it occurs. That's why understanding corruption is essential to ensuring that it never becomes a part of the way we do business.

In simple terms, corruption is the abuse of influence for private gain. All of the countries where we operate have anti-corruption laws that make it illegal to offer a payment, gift or other benefit to a Public Official or private party to improperly obtain favourable treatment. Violations of these laws can result in severe penalties including substantial fines and prison time.

Our position on bribery and corruption is clear – no one may offer or accept a bribe, kickback or other type of improper payment.

## Understanding the requirements can be tricky

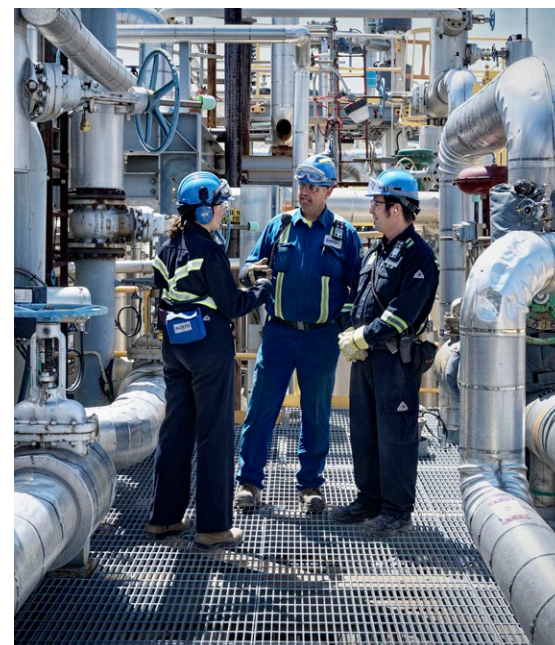
The ethical and legal requirements in these situations can be complex. For example, while laws in some countries may allow facilitating or 'grease' payments, we do not support their use in any circumstances or country. However, in a situation where you believe your health or safety is at imminent risk and you believe a payment is absolutely necessary to preserve your health or safety, you may make the payment provided you immediately report the situation to your leader and Legal Affairs.

### BOTTOM LINE

Never offer or accept any type of improper payment, including bribes, kickbacks or facilitating payments. Also, never make political or charitable donations on Suncor's behalf outside of our corporate donation processes.

[Continued on next page >](#)

**The direct or indirect offer, payment, solicitation or acceptance of bribes in any form is unacceptable and contrary to our Code as well as local and foreign laws.**



## Preventing improper payments (cont'd)

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources

### Third parties

We do business with thousands of suppliers and contractors worldwide. These business associates can play an instrumental role in our success, but their behaviour can also have a direct impact on our reputation.

#### BOTTOM LINE

If you see anything that makes you think a business associate may act unethically, talk to your Legal Affairs representative right away. Deliberately ignoring warning signs of potential wrongdoing could make the situation worse.

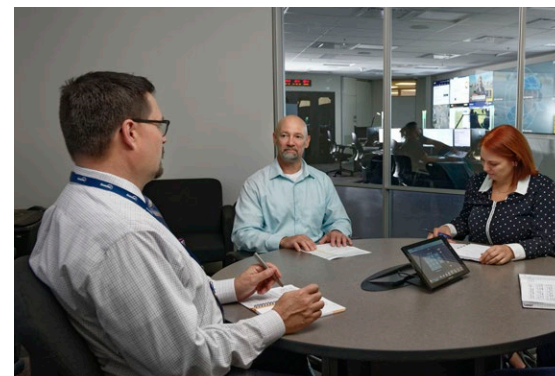
### Interactions with Public Officials

We need to be especially careful when offering gifts, entertainment or other benefits to Public Officials due to the heightened risks involved. We often think of Public Officials as elected officials or government workers but there are less obvious groups, such as employees of state-owned enterprises. The definition of a Public Official under our policy includes:

- Government employees
- Employees of an agency, department, corporation, board, commission or enterprise that is owned or controlled (in whole or in part) by a government
- Anyone acting in an official capacity for a government or any entity owned or controlled (in whole or in part) by a government
- Elected officials, candidates for public office and political party representatives
- Anyone affiliated with a public international organization such as the United Nations or the World Bank

#### BOTTOM LINE

If you are contemplating offering gifts, entertainment, travel, accommodation or anything else of value to a Public Official, talk to your Legal Affairs representative first.



**Q: Our group is considering sending a small token of appreciation to a business contact who works at a company partly owned by a government. Is this a problem?**

**A:** There are many laws and regulations that affect the giving of gifts, meals and entertainment to Public Officials. There is a possibility that sending a gift could contravene these laws so make sure you contact your Legal Affairs representative first.



# Fair competition

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources



Acting with Integrity



Competition laws are in place to ensure fair competition in the marketplace for products and services. They generally prohibit agreements that restrict competition, such as agreements between competitors regarding pricing, bidding, production, supply and customer practices, as well as a variety of other forms of unfair conduct.

## BOTTOM LINE

We do not engage in anti-competitive activities. We compete for business vigorously, honestly and in compliance with all applicable antitrust and competition laws. Seek advice from your leader or Legal Affairs before discussing prices, customers, suppliers, marketing or production intentions with anyone outside Suncor, in particular any competitors.

Visit the [Standards of Business Conduct](#) site for more information.

**Q:** At a recent management committee meeting with our joint venture partners, we discussed establishing a sub-committee to evaluate sharing best practices and technology that we've each developed from earlier projects. Is this okay?

**A:** The exchange of information and technology between joint venture partners must be carefully evaluated to avoid violating competition laws. Contact Legal Affairs beforehand to ensure that the proposed exchange is acceptable and appropriate protocols and restrictions are established.

# Trading in securities

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources



Acting with Integrity



The law prohibits the buying or selling of any securities – including Suncor securities, those of customers, suppliers, joint venture partners and all other entities – by anyone who possesses material, non-public information relating to the issuer of the securities. Material, non-public information is information that would reasonably be expected to have a significant impact on the market value of a security (such as unreleased financial results, future business plans and pending merger or acquisition activities).

Trading in securities, such as common shares or stock options, may only occur after undisclosed material information has been fully disclosed to the public and a reasonable period of time has elapsed.

## Trading blackouts

We are not permitted to trade in Suncor shares and stock options during trading blackouts. Regularly scheduled trading blackouts applying to everyone at Suncor start two trading days before the public announcement of Suncor's quarterly and annual financial results and continue for one trading day after. These blackouts apply because we may possess, or be perceived to possess, inside information and any trading in Suncor securities may at a minimum be perceived to be improper.

[Continued on next page >](#)

**Q:** We have a new employee on our team who recently worked for another energy company. He gave me a tip about a growth announcement his old company's going to make very soon. Is it okay for me to purchase shares of this company at this time?

**A:** No, it's not okay to act on this tip. Both you and the new employee could be in breach of securities laws and company policies. You should immediately discuss this information with your leader who should seek advice from Legal Affairs.



## Trading in securities (cont'd)

Table of  
contents

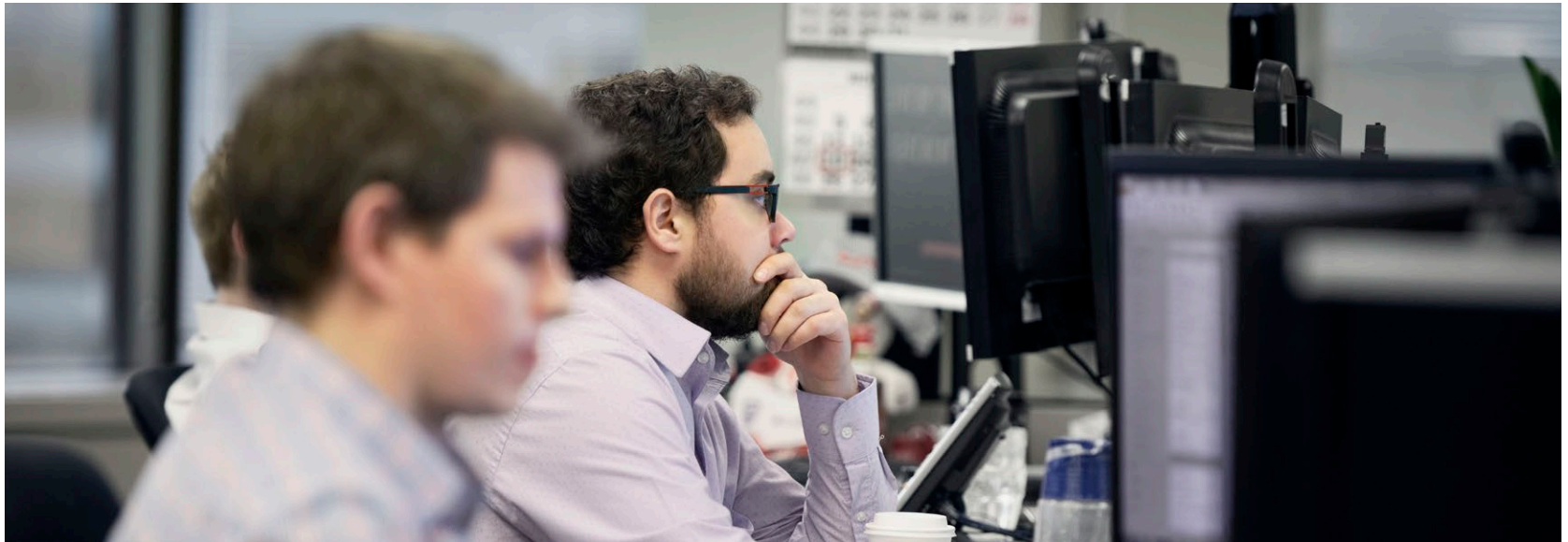
Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources



### Restricted positions and insiders

Further restrictions, including extended quarterly trading blackout periods, apply to restricted persons such as our Board of Directors, senior officers and employees in sensitive positions (such as those involved in the preparation or review of Suncor's financial results). If you are a restricted person, additional restrictions form part of the Code.

### Short selling

We invest in Suncor for the long term and are not permitted to bet against the value of our Suncor securities by "selling short" Suncor shares or purchasing financial instruments to hedge the value of our Suncor shares or other securities (e.g.: stock options or restricted share units).

Visit the [Standards of Business Conduct](#) site for more information.

### BOTTOM LINE

Comply with our trading blackouts and never trade Suncor securities or the securities of any other company on the basis of information that has not been disclosed publicly.

# Accounting and financial reporting

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources

Acting with Integrity



Our policies and procedures ensure that all accounting and financial reporting comply with the relevant, generally accepted accounting principles and, where appropriate, relevant rules and regulations.

## We share a responsibility to ensure that:

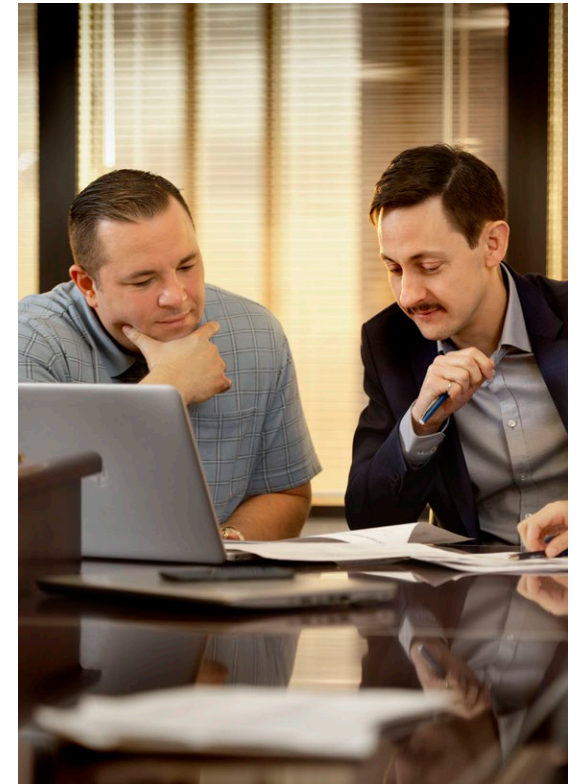
- Transactions are recorded accurately and promptly and that any known inaccuracies, misrepresentations or omissions are promptly identified and reported
- Transactions are conducted within the appropriate level of authority in accordance with prescribed policies and procedures

Visit the [Standards of Business Conduct](#) site for more information.

## BOTTOM LINE

If you know of any questionable or suspicious financial transactions, or non-compliance with our financial controls and processes, speak up and report your concerns immediately to your leader or to Legal Affairs.

**Suncor conducts its financial affairs lawfully, undertaking all transactions in compliance with approved authority limits.**



# Political and charitable activities

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources



Suncor encourages employees to contribute to charitable community services and professional organizations. The use of company time or resources for such activities requires management approval beforehand.

If you hold a position in a non-profit association where you may be viewed as a spokesperson for the group, ensure that you are seen as speaking for your association or as an individual, and not as a Suncor employee or spokesperson.

## BOTTOM LINE

Undertake charitable activities and participation in the democratic process at any level, including election campaigning, on your own time or with prior management approval. If you decide to run for political office, make sure you notify our Government Relations team as a courtesy.



# Using Suncor assets

Table of contents

Our code

Living our values

Sharing information

Acting with integrity

Resources

Everyone who works for Suncor shares a responsibility for protecting company assets, both physical assets (equipment, credit cards, supplies, etc.) and digital assets (information, systems, online services, etc.).

We must ensure the care, management and cost-effective use of Suncor's property. This includes protecting it from waste, theft, misuse, damage, loss or misappropriation.

It is important that we maintain, reasonably protect and be able to account for all company assets provided to us.

## Using email and the Internet properly

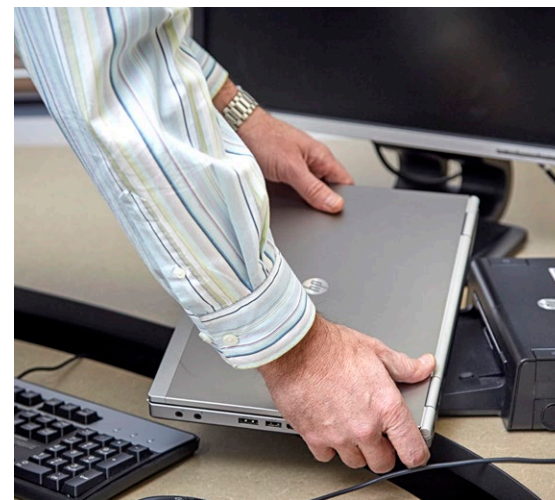
Suncor provides email and Internet access to conduct business, promote work-related research and enhance internal and external communication. This means we need to take reasonable care to protect Suncor's systems, equipment and information.

The Internet is an uncontrolled environment. Suncor's email carries information that identifies us and the company. Ensure all email communications are appropriate and polite. We should not transmit Suncor confidential or business-sensitive material over the Internet unless the information will be secure and protected.

**Activities on Suncor systems** – including email and voicemail systems, Internet, computers, cell phones and other digital devices such as tablets – are monitored to ensure acceptable use. We should not expect personal privacy for communications that we send, receive or store on these systems or devices.

[Continued on next page >](#)

**Always dispose of property in accordance with company guidelines regarding the disposal of surplus assets and the deletion of Suncor information from those assets. Seek approval from your leader if you have any questions.**



## Using Suncor assets (cont'd)

Table of  
contents

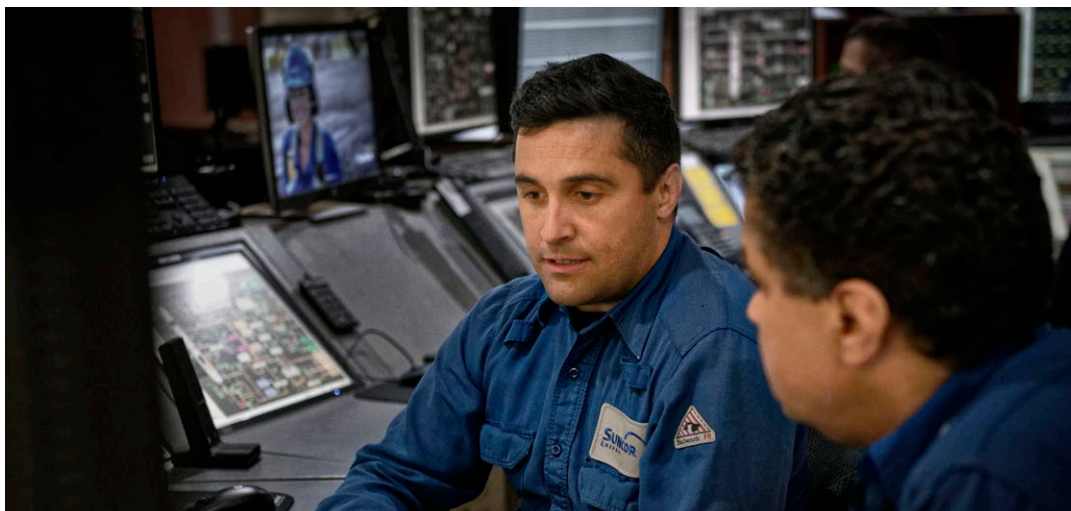
Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources



### BOTTOM LINE

- Never use Suncor's computers to download any illegal or unauthorized software
- Avoid websites that contain tasteless, obscene, insensitive, racist, political, hateful or sexist material
- Never send communication under disguised identification or send slanderous, threatening or harassing messages
- Never send, view or obtain material of an obscene or otherwise objectionable nature
- Keep your work passwords confidential as you would your own banking information and personal access codes
- Report any suspicious activity related to Suncor information, systems or equipment to the Client Support Centre

Remember that company assets should only be used to advance Suncor's business purposes and goals. Limited personal use of Suncor communication resources is permitted for purposes that are lawful, ethical and consistent with the Code, as long as the use does not interfere with work obligations. At all times, take care to protect Suncor's systems and information.

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

# Resources

- > Tools and contacts
- > Suncor Integrity Hotline



# Tools and contacts

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources



Our Standards of Business Conduct Code is simply the way we do business.

For more information:

- Visit the [Acting with Integrity website](#)
- Review the relevant PG&S at [Standards of Business Conduct](#)
- Talk to your leader
- Contact Suncor's Compliance and Ethics group ([complianceandethics@suncor.com](mailto:complianceandethics@suncor.com))
- Talk to Human Resources, [Corporate Security](#) or [Internal Audit](#)
- Contact the [Suncor Integrity Hotline](#)

# The Suncor Integrity Hotline

Table of  
contents

Our code

Living  
our values

Sharing  
information

Acting with  
integrity

Resources



Acting with  
Integrity



You may not feel comfortable or it may not be appropriate to talk to someone directly about a suspected violation of our Code. That's why the Suncor Integrity Hotline exists. You can access the hotline 24 hours a day, seven days a week, 365 days a year. The hotline is administered by an external service provider, NAVEX Global/Ethicspoint, who will assist you in filing the report (either online or over the phone). Topics you can report include:

- Improper payments
- Questionable accounting
- Conflicts of interest
- Dishonest behaviour
- Harassment or workplace violence
- Auditing matters
- Unfair competition practices
- Other matters of concern

[Continued on next page >](#)

**Q: I'm aware of some misconduct in my area, but I don't have all the facts. How certain should I be before I make a report? Should I try to collect more information first?**

**A:** No, it's not necessary to collect more information. In fact, it's not the right course of action to conduct the investigation yourself. Simply report what you know. Suncor has procedures in place to properly investigate matters.

## The Suncor Integrity Hotline (cont'd)

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### How to access the hotline

Online: Access the [Suncor Integrity Hotline](#) website.

By phone: *For international access in countries where AT&T Direct Service is available, dial the AT&T access number, then 866-270-9577, as detailed below.*

**North America**

1-866-270-9577

**Germany**

0-800-225-5288, then 866-270-9577

**United Kingdom**

0-800-89-0011, then 866-270-9577

**Libya and other countries where AT&T Direct Service is not available**

Call collect (reverse charge) to the NAVEX Global Contact Centre by following these steps:

- From an outside line, contact your local operator and request a reverse charge or collect call to the U.S. to 503-726-2426.
- When the operator asks who is placing the call, say "Suncor" (do not give your name).
- NAVEX Global Contact Centre accepts all reverse charge or collect calls.

Due to international privacy laws, NAVEX Global is unable to accept reports from European Union countries on select topics. In those cases, you will be directed to our Corporate Security team for further assistance.