The Way We Do Business
Suncor’s Standards of Business Conduct
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*We create energy for a better world*
Our code

About this resource
Acting with Integrity website
Message from Mark Little
About this resource

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 11 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
- Harassment and Violence Free Working Environment
- Prevention of Improper Payments
- Reporting Insiders
- Trade Relations
- Trading Blackouts for Restricted Persons
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 Mark Little

I am very proud of Suncor’s reputation and commitment to building and maintaining mutual trust and respect while working safely and lawfully. It comes from all of us continually holding ourselves to a high standard of ethical conduct in everything we do.

And it starts with our values. They are the foundation for how we act and do business.

Our Standards of Business Conduct Code, which is summarized in this resource, reinforces every one of our values. This Code serves as a strong reminder that our reputation depends on each of us making the right choices, every day.

That means we are depending on you to be accountable for doing your work with unwavering integrity. We are asking that you continue to hold yourself to a very high standard of business and professional conduct. And we are looking for you to continually strive to do better and lead the way by helping others improve too. Your ethical and professional behaviour is key to our reputation and our success. By acting with integrity, all of us at Suncor can contribute to the environmental, social and economic well-being of the communities where we live and work.

If you are ever unsure or feel that our Code is being violated, speak up. Talk to your leader, our Legal group or contact our Integrity Hotline.

I encourage you to use this resource as a tool to help you make the right decisions in your day-to-day work. It is designed to be read or referenced whenever you need it, year-round.

Let’s all work together to make sure that honesty, integrity, and ethical behaviour are central to how we work.

Mark Little
president and chief executive officer

If you are ever unsure or feel that our Code is being violated, speak up. Talk to your leader, our Legal group or contact our Integrity Hotline.
Living our values

Our values
Our responsibility
Making the right decision
Speak up
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Journey to Zero
Respectful work environment
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
Do it safely or don’t do it.

Respect
Being our best. Giving our best. Showing we care.

Do the right thing
The right way, with integrity.

Raise the bar
Pursue with passion. Always add value.

Commitments matter
We are all connected and part of something bigger.
Our responsibility

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

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 on the Core > About Suncor > Suncor at a Glance > Standards of Business Conduct > Standards of Business Conduct 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.
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.
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**

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.
Journey to Zero

Journey to Zero is our vision for creating a culture of safety that is shared by everyone at Suncor. It is consistent with our commitment to Operational Excellence, is based on the concept that all workplace incidents are preventable and the expectation that everyone who works on Suncor’s behalf finishes their workdays safely.

BOTTOM LINE:

To succeed in our Journey to Zero, we honour our four basic beliefs and commitments:

• All incidents can be prevented
• Safety is a critical part of our culture – it’s how we do business
• We share a responsibility for achieving results the right way, safely. This means protecting the safety and health of our team members, the environment and operating our business reliably and efficiently
• No job is so urgent or routine that it can’t be done safely – if we can’t do it safely, we don’t do it
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.

See the Harassment and Violence Free Working Environment PG&S for more information.
Sharing information

Confidential information
Communicating with the public
Social media
Confidential information

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.
Confidential information cont’d

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.

See the Personal Information Privacy PG&S for more information.

 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.

See the Conflict of Interest and Confidentiality PG&S for more information.
Sharing information

Communicating with the public

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 Business Partner.

Also, if you are asked to make a public presentation on behalf of Suncor, contact your Communications Business Partner 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 Sustainability & Communications group for follow up.
Sharing information

Social media

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

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.

See the Disclosure of Material Information & Trading in Shares & Securities PG&S, the Communications to the Public PG&S, the Social Media Policy Statement and Requirements and the Social Media Standards for more information.
Acting with integrity

Conflicts of interest
Gifts and entertainment
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Political and charitable activities
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Conflicts of interest

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.

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.

See the Conflict of Interest and Confidentiality PG&S and the Directors, Officers, Trustees and Board Members of Outside Organizations PG&S for more information.
Gifts and entertainment

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.

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.

See the Prevention of Improper Payments PG&S and Conflict of Interest and Confidentiality PG&S for more information.
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 >
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.

See the [Prevention of Improper Payments PG&S](#) for more information.
Acting with integrity

Fair competition

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.

See the Competition PG&S and Trade Relations PG&S for more information.
Acting with integrity

Trading in securities

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 two trading days 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.

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.

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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).

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.

See the Disclosure of Material Information and Trading in Shares and Securities PG&S for more information.
Acting with integrity

Accounting and financial reporting

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

See the Accounting, Reporting & Business Control PG&S for more information.

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

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.
Acting with integrity

Political and charitable activities

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

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 >
Using Suncor assets cont’d

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.

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

See the Information Security Policy for more information.
Resources

Tools and contacts
Suncor Integrity Hotline
Our Standards of Business Conduct Code is simply the way we do business.

For more information:
- Visit the Acting with Integrity website on the Core (About Suncor > Suncor at a Glance > Acting with Integrity)
- Review the relevant PG&S on the Core (About Suncor > Suncor at a Glance > Standards of Business Conduct)
- Talk to your leader
- Contact Suncor’s Compliance and Ethics group (complianceandethics@suncor.com)
- Talk to Human Resources, Corporate Security or Internal Audit
- Contact the Suncor Integrity Hotline
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

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.

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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

China (Southern)
10-800-120-1239

China (Northern)
10-800-712-1239

Syria
0-801, then 866-270-9577

Norway
800-190-11, then 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.