

# RESPECTFUL WORKPLACE POLICY



## I. PURPOSE OF THE POLICY

Pembina is committed to providing a respectful workplace in which all people are treated with respect and dignity. The safety and well-being of everyone working for or in connection with Pembina is a priority for Pembina and harassment, discrimination and violence will not be tolerated in any form.

The image and reputation of Pembina is determined in large part by the way its Personnel are seen to behave. Our Personnel are our ambassadors and can enhance our reputation by their adherence to the principles set out in this Policy. Harassment, discrimination, and violence by our Personnel in the workplace and outside of the workplace can jeopardize Pembina's reputation and reflect negatively on our products and services. Pembina expects its Personnel to comply with the principles set out in this Policy at all times.

The purpose of this Policy is to establish clear standards and expectations for all Personnel in order to prevent and protect individuals from harassment, discrimination and violence.

## II. SCOPE AND APPLICATION

This Policy applies to all Personnel and any other individuals attending Pembina's workplace. It applies to behaviour in the office, field, at client sites, during business-related travel, at conferences and training sessions, in the course of telephone, email and other communications and at Pembina-sponsored events.

Pembina will ensure that this Policy is implemented and followed, and that all Personnel have the appropriate information and instruction to protect them from harassment, discrimination, and violence.

All Personnel are responsible for conducting themselves in a manner consistent with this Policy. Any Worker determined by Pembina to be responsible for a violation of this Policy may be subject to appropriate disciplinary action, up to and including termination of employment for cause or termination of engagement. See Part IX (Compliance) of this Policy.

### Definitions

In this Policy:

"**Leader**" means all Personnel who have charge of a work site or authority over other Personnel;

"**Pembina**" means collectively, Pembina Pipeline Corporation and its subsidiaries;

"**Personnel**" means the collective Pembina employees, officers, consultants, contractors, and directors;

"**Policy**" means this Respectful Workplace Policy; and

"Worker" means any individual Pembina employee, officer, consultant, contractor, or director.

### III. PRINCIPLES AND PROHIBITED CONDUCT

Pembina strictly prohibits discrimination, harassment, and violence in every form.

#### A. Discrimination

Discrimination means the treatment, consideration of, or distinction in favour of or against an individual based on their race, religious beliefs, colour, gender, gender identity, disability, age, ancestry, place of origin, marital status, family status, sexual orientation, or any other ground protected under applicable human rights law.

#### B. Harassment

Harassment means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action that creates or may create an intimidating, hostile or offensive work environment, or that impugns the dignity of the individual, causes the individual to fear for their safety or safety of their loved ones, could foreseeably cause emotional distress, or causes harm to the individual.

Behaviour need not be intentional to be considered harassment. Harassment may take many forms and is considered to have occurred if a person knows or ought reasonably to have known that the behaviour is unwelcome. Harassment does not include reasonable action taken by Pembina relating to the management and direction of Personnel.

Examples of behaviour that may constitute harassment include, but are not limited to:

- (a) displaying or circulating offensive pictures or materials;
- (b) making remarks, jokes or innuendo that demean, ridicule, intimidate or offend;
- (c) sending or making offensive or intimidating emails or phone calls;
- (d) bullying; and
- (e) repeated communications, threats, insults, or stalking.

Sexual harassment is also a form of harassment. Sexual harassment includes, but is not limited to:

- (a) engaging in a course of vexatious comment or conduct on the basis of sex, sexualorientation, gender, gender identity or gender expression, where the course of comment orconduct is known to be or ought reasonably be known to be unwelcome;
- (b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement and the person knows or ought reasonably to know that the solicitation or advance is unwelcome; and
- (c) making unwelcome sexual flirtation, advances or propositions, or engaging in any other unwelcome verbal, visual or physical conduct of a sexual nature, including unnecessary touching, sexually-

oriented comments or teasing, jokes about gender-specific traits, displaying sexually suggestive objects or pictures, sexually explicit or offensive jokes, stories, cartoons, nicknames or comments of a sexual nature.

### **C. Violence**

Workplace violence means the attempted, threatened or actual exercise of physical force by a person that causes or could reasonably cause physical injury. Workplace violence includes any statement or behaviour that a person could reasonably interpret as a threat to exercise physical force.

Violence can take many forms. Examples of behaviour that may constitute workplace violence include, but are not limited to:

- (a) engaging in physical battery, assault or aggression;
- (b) threatening verbal communications or gestures (e.g., shaking one's fist); and
- (c) leaving threatening notes or sending threatening emails in the workplace.

### **D. Conduct by Suppliers, Customers and Members of the Public**

Pembina's obligation to provide a respectful workplace extends to include circumstances where Personnel may be subject to discrimination, harassment, or violence from individuals external to the workforce while acting on behalf of Pembina, such as suppliers, customers, and members of the public.

Any Personnel who is subject to or witness's discrimination, harassment, or violence by or of non-Personnel should address the incident in accordance with Part V (Resolution Procedures) of this Policy.

## **IV. RESPONSIBILITIES**

All Personnel are responsible for, and have a part in, ensuring that Pembina's workplace is free from harassment, discrimination, and violence. As such, all Personnel are responsible for conducting themselves in a manner consistent with this Policy.

In this context, all Personnel must:

- (a) maintain a safe work environment;
- (b) understand and uphold the principles of this Policy;
- (c) not engage in or ignore discriminatory, harassing, or violent behaviour;
- (d) promptly report any incident where they are subject to, witness, or have knowledge of workplace discrimination, harassment, or violence, or have reason to believe that any such behaviour has occurred; and
- (e) maintain confidentiality throughout the complaint, investigation, and communication process unless necessary to obtain advice about their rights.

Leaders have specific responsibilities pursuant to this Policy. All Leaders must:

- (a) promote a safe and healthy workplace free from discrimination, harassment and violence;
- (b) understand and uphold the principles of this Policy;
- (c) ensure that Personnel under their authority understand and adhere to this Policy;
- (d) make all reasonable efforts to ensure that Personnel under their authority are not subject to and do not participate in discrimination, harassment or violence;
- (e) immediately respond to any complaint of discrimination, harassment or violence that has taken place or a situation that Personnel feel may become violent;
- (f) immediately report all cases of workplace violence and harassment to Pembina's human resources and/or legal departments; and
- (g) cooperate and participate in the complaint, investigation and communication process as required and maintain confidentiality in accordance with this Policy.

Pembina is, in turn, responsible for maintaining a safe work environment and ensuring that the principles set forth under this Policy are upheld. Pembina must:

- (a) provide appropriate information and instruction on this Policy to all Personnel;
- (b) take all reasonable and practical measures to minimize and eliminate risks of workplace discrimination, harassment and violence identified through workplace assessments, inspections, or the occurrence of an incident;
- (c) respond promptly to all reports of workplace discrimination, harassment or violence;
- (d) immediately address all incidents of workplace discrimination, harassment or violence;
- (e) not condone or permit any behaviour contrary to this Policy;
- (f) establish or appoint Joint Health & Safety Committees or Health and Safety Representatives and consult with such committees and representatives in identifying and responding to health and safety concerns and hazards (such as workplace discrimination, harassment, and violence), developing health and safety policies and developing and promoting educating and training programs.; and
- (g) inform complainants and alleged offenders of the results of an investigation and any corrective action that will be taken.

Pembina does not tolerate any discriminatory, harassing, or violent behaviour and will respond in accordance with this Policy whenever Pembina becomes aware of such scenarios through reporting mechanisms or otherwise.

## V. RESOLUTION PROCEDURES

There are several ways to resolve conflicts and disputes involving potentially prohibited conduct under this Policy. Depending on the circumstances, one or more of the following approaches should be undertaken.

### A. Reporting Violence

Any Personnel who have been the victim of or have witnessed workplace violence must immediately report the conduct to a Leader or member of management. If the alleged offender is the Worker's Leader, the Worker should report the behaviour to another Leader or member of management, or to Pembina's human resources and/or legal departments. Reports of violence will be dealt with in accordance with the formal complaint process outlined below.

Threats or violence of a serious nature should be reported to the local police immediately.

### B. Informal Processes

With the exception of workplace violence situations addressed above, a Worker who feels they have been subject to prohibited conduct under this Policy should promptly report any such conduct to their Leader or a member of Pembina's human resources department. Depending on the circumstances, the issue may be dealt with through the following processes:

- (a) where the Worker feels comfortable in doing so, they may be encouraged to approach the offending party directly (communicating that their behaviour is unwelcome and asking them to stop);
- (b) where a Worker is uncomfortable approaching a person directly, or where addressing the issue directly does not resolve the issue, a facilitated problem-solving discussion may be arranged by the Worker's Leader or Pembina's human resources department; and
- (c) in some circumstances and upon mutual agreement of the involved parties, engagement of a third party may be arranged by the Worker's Leader or Pembina's human resources department.

### C. Formal Complaint

In response to reports of workplace violence or in circumstances where it is not possible to resolve potentially prohibited conduct under this Policy using the informal processes outlined above, a Worker may submit a formal complaint in accordance with the following procedures:

- (a) a Worker may submit a formal complaint to their Leader or member of management or to Pembina's human resources and/or legal departments;
- (b) Pembina will investigate all such reports promptly and impartially;
- (c) any person or persons who may have engaged in prohibited conduct under this Policy may be asked to: (i) leave the workplace on a short-term or long-term basis for the purpose of investigation; (ii) cease performing any work on behalf of Pembina, including but not limited to field or remote work, emails, or other activities; and/or (iii) not return to the workplace until expressly advised by Pembina to do so;

- (d) an investigation will generally include obtaining a written statement from the complainant, as well as interviewing any person with knowledge of the incident and collecting all relevant and material documents and other evidence. Individuals with knowledge of the incident may also be asked to provide a written statement. Pembina may appoint a qualified independent investigator to investigate a complaint and report on the investigation to Pembina's human resources and/or legal departments;
- (e) all Personnel are expected to cooperate fully in the investigation of any complaint pursuant to this Policy. If, after investigation, Pembina finds that a violation of this Policy has occurred, Pembina will determine what remedial action should be taken to avoid future incidents and to protect the health and safety of all parties in the workplace; and
- (f) following the conclusion of the investigation, the complainant and the alleged offender will be informed of the results of the investigation and of any corrective or disciplinary action that has been taken or that will be taken as a result of the investigation.

## VI. CONFIDENTIALITY

Confidentiality will be maintained throughout any complaint, investigatory, and disciplinary processes to the extent practicable and appropriate in the circumstances. Information obtained in connection with this Policy, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or as otherwise required by law. However, investigations may require disclosure of certain information to the alleged offender and other witnesses in order to gather pertinent facts.

Additionally, while an investigation is ongoing, the complainant, alleged offender, and any witnesses should not discuss the incident, complaint, or investigation with anyone unless necessary to obtain advice about their rights.

## VII. NO RETALIATION OR REPRISAL

Pembina will not retaliate in any way against a Worker who files a complaint in good faith or who acts as a witness in relation to an incident or complaint of discrimination, harassment or violence.

Pembina also prohibits retaliation by anyone within Pembina against a Worker who makes a complaint in good faith or acts as a witness in relation to an incident or complaint of discrimination, harassment or violence.

Any Worker who retaliates against a person for seeking assistance through this Policy or for filing a complaint, may be subject to discipline, up to and including termination of employment for cause or termination of engagement.

## VIII. COMPLIANCE WITH LAW

This Policy was drafted to comply with all applicable laws, including applicable employment standards, occupational health and safety, human rights and privacy laws. To the extent there is an inconsistency

between this Policy and applicable laws, the applicable laws shall govern without affecting the remainder of this Policy.

## **IX. COMPLIANCE**

Personnel must comply with this Policy at all times. Any breaches of this Policy may result in disciplinary action up to and including termination of employment for cause or termination of engagement, as well as potential civil and criminal sanctions.

Nothing in this Policy prevents or discourages Personnel from contacting a province's human rights or occupational health and safety authority. Additionally, all Personnel retain the right to exercise any other legal avenues that may be available.

If Personnel are found to have knowingly made a false complaint of prohibited conduct under this Policy, appropriate disciplinary action may be taken against that Worker, up to and including termination of employment for cause or termination of engagement.

Violations of this Policy should be reported in accordance with Part V (Resolution Procedures) of this Policy. If you are uncomfortable addressing your concerns in accordance with the resolution procedures set out in Part V of this Policy, Personnel should refer to Pembina's Whistleblower Policy for additional reporting procedures.

## **X. REVIEWED AND APPROVED**

Each time Pembina undertakes an assessment of the risks of discrimination, harassment and violence that may arise from the nature of the workplace, the type of work or the conditions of work, this Policy will be updated with any measures and procedures to control the risks identified in the assessment.

The Vice President, Human Resources is the executive responsible for this Policy. This Policy will be reviewed annually by the Vice President, Human Resources and submitted to the Talent Management Committee for approval. Any material change to this Policy must be submitted to the Human Resources, Health, and Compensation Committee for approval.

This Policy was last approved by the Talent Management Committee in August 2023.

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## **XI. KEY CONTACTS**

In case of an emergency, call 911 immediately. Otherwise, the key contacts with respect to this Policy are:

- Vice President – General Counsel and Corporate Secretary

## XII. RELATED POLICIES

The following policies relates to the subject matter of this Policy:

- Code of Ethics Policy
- Whistleblower Policy

## XIII. SUPPORTING DOCUMENTS

Rules and Conventions in support of this Policy may be created and approved by Vice President, Human Resources and the Talent Management Committee.