

SANCTIONS POLICY



I. PURPOSE OF THE POLICY

The Corporation is committed to carrying out Pembina's business activities in compliance with Sanctions Laws. Failure to comply with Sanctions Laws can lead to severe civil and criminal penalties against Pembina and Personnel involved in the improper activity and may cause significant reputational damage to Pembina. The purpose of this Policy is to set out the Corporation's risk-based approach to compliance with Sanctions Laws.

The key objectives of this Policy are to:

- Provide guidance and requirements for Pembina and its Personnel to comply with all applicable legal obligations related to Sanctions Laws;
- Protect Pembina's reputation and ensure continued access to the goods, services, and technology required to conduct its business; and
- Demonstrate Pembina's commitment to compliance with Sanctions Laws to third parties, including joint venture partners, governmental authorities, and local stakeholders.

II. SCOPE AND APPLICATION

This Policy applies to all Personnel.

Definitions

In this Policy:

"Beneficial Owner" means an individual or entity that is considered to enjoy the benefit of ownership in respect of an interest in the entity in question, whether or not they are the registered owner of that interest and where such ownership will constitute at least a 10% interest in the entity in question;

"Corporation" means Pembina Pipeline Corporation;

"Leader" means Personnel at the supervisor level or higher;

"OFAC" means the U.S. Department of the Treasury's Office of Foreign Assets Control;

"Pembina" means, collectively, the Corporation and its wholly owned subsidiaries;

"Personnel" means all officers, employees, consultants, contractors, and directors of Pembina;

"Policy" means this Sanctions Policy; and

"**Sanctions Laws**" means applicable sanctions laws, rules and regulations imposed by the Canadian government, the United States government, and the United Nations, as well as other country-specific or international sanctions applicable to Pembina's business that restrict or prohibit dealings with certain countries or territories, entities or individuals, all as may be amended from time to time. Such restrictions and prohibitions take various forms, including: broad prohibitions on dealings with or within certain countries or territories, individuals or entities (e.g., corporations; partnerships); trade restrictions, including arms embargoes and prohibitions on exports of certain equipment; financial sanctions, such as asset freezes and prohibitions on financial transactions; and travel bans. Sanctions Laws and the corresponding sanctions lists in the jurisdictions in which Pembina operates may include:

- sanctions imposed pursuant to United Nations Security Council resolutions and the United Nations Security Council Consolidated List;
- the comprehensive and list-based sanctions programs administered by the OFAC and OFAC sanctions lists, including the Specially Designated Nationals and Blocked Persons List, the Sectoral Sanctions Identification List, and other lists established under United States laws and regulations;
- the Financial Crimes Enforcement Network bureau of the U.S. Department of the Treasury;
- Canadian autonomous sanctions regimes under the *Special Economic Measures Act*, the *United Nations Act*, the *Freezing Assets of Corrupt Foreign Officials Act*, and other lists established under Canadian laws and regulations; and
- other country-specific and international sanctions lists in jurisdictions in which Pembina operates.

III. PRINCIPLES

Sanctions Laws

Sanctions Laws are regulatory or quasi-regulatory restrictions imposed by governments and international bodies (e.g., the United Nations) that restrict or prohibit different business activities with certain countries or territories, entities, or individuals for a variety of purposes, including national security and supporting foreign policy goals. Generally, there are three types of Sanctions Laws:

- country or territory specific sanctions, which impose broad prohibitions against providing or receiving goods and services to or from a particular country or part of a country;
- list-based or targeted sanctions such as specifically designated nationals (under U.S. Sanctions Laws) or designated persons (under Canadian Sanctions Laws); and
- specific programs designating certain types of transactions, for example in a certain industry sector relating to a particular country, as prohibited or subject to other restrictions.

Notwithstanding anything to the contrary contained in this Policy, nothing in this Policy shall require Personnel who are not residents or citizens of the United States to commit any act or omission that contravenes blocking legislation applicable to them, such as Canada's *Foreign Extraterritorial Measures Act*.

Changing Nature of Sanctions

Sanctions Laws applicable to Pembina and its Personnel, the targets of such Sanctions Laws and the nature of the prohibitions and restrictions imposed by Sanctions Laws are subject to change on a regular basis. Pembina and its Personnel must ensure compliance with all Sanctions Laws, and for compliance purposes it is therefore essential to maintain up-to-date information about all Sanctions Laws that apply to its business.

IV. RESPONSIBILITIES

In addition to this Policy, Pembina and its Personnel must comply with all Sanctions Laws and are prohibited from engaging in any business or activities that could violate Sanctions Laws. To ensure compliance with Sanctions Laws, Personnel must adhere to applicable internal processes prior to entering into a transaction or agreement with any third-party. If you are unaware of, or have questions about, the applicable processes, you should seek guidance from the Director, Supply Chain Enablement, or a member of the Legal Services Unit prior to entering into a transaction or agreement with any third-party.

Pembina's reputation is built through the conduct of its Personnel in dealings on behalf of the Corporation. Pembina expects its reputation to be beyond reproach, and one that all Personnel can be proud of.

Business with Sanctioned Individuals or Entities

Pembina and its Personnel must not enter into a transaction or agreement with any individual, entity or entity with Beneficial Owners that is designated under Sanctions Laws. Further, Pembina will ensure that if an individual, entity, or Beneficial Owner of an entity become subject to sanctions under Sanctions Laws, any business with such individual or associated entity will either be terminated or duly restricted, as required, as soon as reasonably practicable after the individual, entity or Beneficial Owner of an entity becomes subject to sanctions under Sanctions Laws. To the extent that Personnel are unable to determine whether an individual or an entity is the Beneficial Owner of an entity that is subject to sanctions under Sanctions Laws, they should consult with the Senior Vice President, External Affairs and Chief Legal and Sustainability Officer, or a member of the Legal Services Unit.

If Pembina is considering entering into a transaction or agreement with an entity whose parent company or subsidiary company is designated under Sanctions Laws, or where a Beneficial Owner of such parent or subsidiary company is designated under Sanctions Laws, Personnel should consult with the Senior Vice President, External Affairs and Chief Legal and Sustainability Officer, or a member of the Legal Services Unit prior to entering into such transaction or agreement. Further, if a parent company, subsidiary company, or Beneficial Owner of a parent or subsidiary company of a company Pembina does business with becomes subject to sanctions under Sanctions Laws, Personnel should consult with the Senior Vice President, External Affairs and Chief Legal and Sustainability Officer, or a member of the Legal Services Unit as soon as reasonably practicable after the entity or Beneficial Owner becomes subject to sanctions under Sanctions Laws in order to determine whether any steps need to be taken associated with the business being conducted.

Pembina and its Personnel must also not enter into any transaction or agreement with any individual or entity located in, or representing, a sanctioned jurisdiction. To the extent that Personnel are contemplating business with individuals or entities based in a sanctioned jurisdiction, they must consult with the Senior Vice President, External Affairs and Chief Legal and Sustainability Officer, or a member of the Legal

Services Unit, in advance of the proposed transaction. Pembina will ensure that if a jurisdiction subsequently becomes sanctioned under Sanctions Laws, it will review to determine if it has business with individuals or entities based in that jurisdiction and, if it does, it will ensure that any business with such entity or individual will either be terminated or duly restricted, as required, as soon as reasonably practicable after the jurisdiction becomes subject to sanctions under Sanctions Laws.

In addition, Pembina will consider and appropriately address Sanctions Laws-related obligations in its financing agreements, including but not limited to lending and insurance agreements, which can extend beyond the legal obligations imposed by Sanctions Laws.

V. 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, including fines and imprisonment.

Raise Concerns

Personnel are required to promptly report any potential or suspected violation of this Policy or Sanctions Laws, whether committed by Pembina, Personnel or by others associated with Pembina. Violations of this Policy should be reported in accordance with Pembina's Whistleblower Policy.

When in Doubt, Seek Guidance

If you are ever unsure of how to react to a situation or whether certain conduct may be improper or contrary to this Policy or if you have questions more generally about this Policy, you should seek guidance from your Leader, a member of the Legal Services Unit, or the Corporation's Senior Vice President, External Affairs and Chief Legal and Sustainability Officer.

VI. REVIEWED AND APPROVED

The Senior Vice President, External Affairs and Chief Legal and Sustainability Officer and the Senior Vice President and Corporate Services Officer are the owners of this Policy. This Policy will be:

- reviewed by the Senior Vice President, External Affairs and Chief Legal and Sustainability Officer and the Senior Vice President and Corporate Services Officer annually; and also
- reviewed and approved by the Governance, Nominating and Corporate Social Responsibility Committee annually.

This Policy was last reviewed and approved by the Governance, Nominating and Corporate Social Responsibility Committee in August 2024.

VII. RELATED POLICIES

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

- Anti-Bribery Policy
- Code of Ethics Policy
- Whistleblower Policy

VIII. SUPPORTING DOCUMENTS

Rules and Conventions in support of this Policy may be created and approved by the Senior Vice President, External Affairs and Chief Legal and Sustainability Officer and the Senior Vice President and Corporate Services Officer.