

Conflict of Interest

Policy: Conflict of Interest
Policy Owner: Vice President, Business Services

Policy Statement

It is the policy of Syncrude that directors, officers and employees are expected to avoid any actual or apparent conflict between their own personal interests and the interests of the company.

A conflict of interest can arise when a director, officer or employee takes actions or has personal interests that may interfere with his or her objective and effective performance of work for the company. For example, directors, officers and employees are expected to:

- Avoid actual or apparent conflict in dealings with suppliers, customers, competitors and other third parties;
- Refrain from taking for themselves opportunities discovered through their use of corporate assets or through their positions with the company;
- Avoid securities transactions based on material, non-public information learned through their positions with the company; and
- Refrain from competing with the company.

Administration of Policy

This Policy will be administered directly and through the following Application Guideline:

- Conflict of Interest

Date Last Issued: January 21, 2019

Current versions of approved documents are maintained online.

Printed copies are uncontrolled.

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