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				Verify revision is current prior to use.

Contains commercially sensitive information. Refer to cover page to materials regarding restrictions.

# PRINCIPLES OF BUSINESS ETHICS POLICY

<b>Board of Directors</b>		Date Approved
		February 29, 2024
<b>Executive Sponsor</b>	Title	Date Approved
Erica Young	Chief Legal, Regulatory and Commercial Officer	February 29, 2024
Content Owner	Title	Date Approved
Tracy Coutts	Director, Compliance	February 29, 2024

Review of this Policy is required every three years.

Revision history of this Policy is referenced in Schedule "B".

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# This <u>Policy</u> applies to <u>ENMAX</u> Corporation and its Subsidiaries ("<u>ENMAX</u>").

The <u>Board of Directors</u> has the primary responsibility for the approval of this <u>Policy</u>, for charging specific committees of the <u>Board of Directors</u> with the oversight of this specific <u>Policy</u>, and authorizing specific members of the Executive Team to interpret and update this Policy.

Amendments to this <u>Policy</u> may only be approved by resolution of the <u>Board of Directors</u>. However, amendments that only alter the form (and not the substance) of the <u>Policy</u> will not require <u>Board of Directors</u> approval. The <u>Board of Directors</u> reserves the right and responsibility for interpreting this <u>Policy</u>. The <u>Chief Executive Officer</u> is responsible for interpreting this <u>Policy</u> where engagement of the <u>Board of Directors</u> is not necessary. The <u>Executive Sponsor</u> is responsible for updating this <u>Policy</u>.

Any questions about this <u>Policy</u> should be addressed to the <u>Executive Sponsor</u> or <u>Content Owner</u> directly, through a supervisor, or by contacting the <u>ENMAX</u> Compliance Department through <u>compliance@enmax.com</u>.

### 1.0 PURPOSE

Unless expressly provided herein to the contrary, this <u>Policy</u> applies to all <u>ENMAX Personnel</u>.

This <u>Policy</u> establishes the appropriate and expected behaviour for maintaining <u>ENMAX's</u> reputation for honesty and integrity earned by maintaining the highest standards of business ethics and compliance with Applicable Laws.

# 2.0 **DEFINITIONS**

Capitalized and underlined terms used in this <u>Policy</u> are defined in Schedule "A" attached to this Policy.

### 3.0 PRINCIPLES

# 3.1 Compliance with all Applicable Laws and this Policy

All <u>Personnel</u> are expected to comply with all <u>Applicable Laws</u> and all aspects of this <u>Policy</u>. This <u>Policy</u> does not specifically address every potential form of unacceptable conduct, and it is expected that all <u>Personnel</u> will exercise good judgment. All <u>Personnel</u> have a duty to comply with the letter and spirit of this <u>Policy</u>.

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#### 3.2 Contractors

For greater clarification, in the case of <u>Personnel</u> that are <u>Contractors</u>, this <u>Policy</u> shall apply to only those <u>Contractors</u> that are providing services to <u>ENMAX</u> and that are advised, in writing, of the applicability of this <u>Policy</u> to the provision of those services, and in such cases this <u>Policy</u> shall apply with such necessary and appropriate modifications to recognize that <u>Contractors</u> are not <u>Directors</u>, <u>Officers</u> or <u>Employees</u> of <u>ENMAX</u>.

# 3.3 Corporate Responsibility

<u>Corporate Responsibility</u> at <u>ENMAX</u> refers to the simple principle that how we conduct our business is equally as important as the profits we earn.

<u>Corporate Responsibility</u> demonstrates our belief in taking personal accountability for all that we do, including safety, customer care, environmental stewardship, and meaningful stakeholder and community engagement. <u>ENMAX</u> and its <u>Personnel</u> will seek to increase competitiveness and maximize value to the shareholder while understanding and embracing corporate responsibility for the impact of <u>ENMAX</u> activities on the environment, consumers, <u>Personnel</u>, communities and the citizens of Calgary, and all other <u>Stakeholders</u> to the extent that is reasonably achievable.

#### 3.4 No Retaliation for Raising Concern

<u>Personnel</u> may submit a complaint regarding a suspected violation of this <u>Policy</u> without fear of dismissal or retaliation. <u>ENMAX</u> prohibits any form of retaliation for raising concerns or reporting possible misconduct in good faith or for assisting in the investigation of possible misconduct. No adverse action will be taken against any individual for making a complaint or disclosing information in good faith. Any <u>Personnel</u> who retaliates in any way against an individual who reports any violation, or suspected violation, of this <u>Policy</u> will be subject to disciplinary action.

### 4.0 RESPONSIBILITIES AS PERSONNEL, SUPERVISORS AND MANAGERS, AND OFFICERS

### 4.1 Personnel

All <u>Personnel</u> are required to read and fully understand this <u>Policy</u>. If they do not understand this <u>Policy</u>, <u>Personnel</u> have an obligation to seek advice or guidance from the <u>Content Owner</u> or <u>Executive Sponsor</u>. If <u>Personnel</u> are aware of any conduct involving other <u>Personnel</u> that may violate this <u>Policy</u>, there is an obligation on that individual to report the issue to a supervisor, an <u>Officer</u> of <u>ENMAX</u>, the <u>Content Owner</u>, the <u>Executive Sponsor</u> or the <u>ENMAX</u> Safety and Ethics

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Helpline (1-800-661-9675 or <a href="www.enmax.confidenceline.net">www.enmax.confidenceline.net</a>) promptly. Confidentiality will be maintained to the extent consistent with the best interests of the <a href="Personnel">Personnel</a> involved, and <a href="ENMAX's">ENMAX's</a> obligations under any <a href="Applicable Laws">Applicable Laws</a>.

#### 4.2 Supervisors and Managers

In addition to their responsibilities as <u>Personnel</u>, supervisors and managers are responsible for enabling their direct reports to understand and comply with this <u>Policy</u>. As the first point of contact for <u>Personnel</u>, supervisors and managers need to be a knowledgeable and reliable source of advice.

Supervisors and managers should make it possible for their staff to comfortably express their concerns about possible violations of this <u>Policy</u>. This means advising <u>Personnel</u> when it becomes necessary to disclose their concerns to senior Management.

Supervisors and managers are obligated to escalate suspected violations of this <u>Policy</u> to senior <u>Management</u> of their <u>Business Unit</u> or, if they are concerned about such escalation due to the nature of the suspected violation, to the <u>Executive Sponsor</u> or the Vice President, People and Culture.

### 4.3 Officers

<u>ENMAX Officers</u>, in addition to their responsibilities as <u>Employees</u> and supervisors, are accountable for ensuring all <u>Personnel</u> are provided with training in relation to this <u>Policy</u>. The <u>Chief Executive Officer</u> is ultimately responsible for <u>ENMAX's</u> compliance with this <u>Policy</u>.

### 5.0 ETHICAL CONDUCT IN THE WORKPLACE

# 5.1 Diversity

<u>ENMAX</u> promotes and encourages a culture of diversity, inclusion and acceptance and prohibits any form of <u>Discrimination</u> in hiring and employment practices.

#### 5.2 Harassment

ENMAX treats all <u>Customers</u>, <u>Stakeholders</u> and <u>Personnel</u> with dignity and respect, working together to create a respectful and ethical workplace. Harassments includes intimidating, hostile, offensive, violent, demeaning, threatening or humiliating to any person or group of people within <u>ENMAX</u>, <u>Stakeholders</u>, or customers will not be tolerated. If such behaviour is witnessed, it must be reported to a supervisor, the <u>Executive Sponsor</u>, <u>Content Owner</u>, Vice President, People and Culture or by using the <u>ENMAX</u> Safety and Ethics Helpline (1-800-661-9675 or www.enmax.confidenceline.net).

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### 6.0 ETHICAL CONDUCT IN BUSINESS RELATIONSHIPS

# 6.1 Suppliers and Stakeholders

<u>ENMAX</u> and its <u>Personnel</u> are committed to fair competition in all dealings with suppliers and <u>Stakeholders</u>. All purchases made on behalf of <u>ENMAX</u> are made honestly and objectively.

#### 6.2 Customers

<u>ENMAX</u> and its <u>Personnel</u> provide <u>Customers</u> with the truthful information required to make informed choices about products and services offered by <u>ENMAX</u>. <u>Personnel</u> shall not take unfair advantage of anyone, including <u>Customers</u>. Taking unfair advantage includes manipulation, concealment, misrepresentation of material facts, or any other unfair dealing practice.

All transactions, including payment arrangements, involving <u>ENMAX</u> accounts of <u>Employees</u> or individuals with a personal association with <u>ENMAX</u> <u>Employees</u> must be processed in accordance with standard <u>ENMAX</u> practices.

<u>ENMAX</u> <u>Employees</u> may access or review their own <u>ENMAX</u> account through online activities such as the customer portal through enmax.com or the <u>ENMAX</u> Energy app as these systems are electronically logged.

<u>Employees</u> must never access or review their own <u>ENMAX</u> accounts through other means unless a valid exception has been approved, and documented within the exception log. Requests for exceptions can be sent to <u>ENMAX</u> Compliance at compliance@enmax.com. The <u>ENMAX</u> Compliance team maintains a log of approved exceptions, performs periodic reviews to ensure logged exceptions remain required, and to annually report to the <u>Executive Sponsor</u> on exceptions granted.

<u>Employees</u> who may be exposed to the <u>ENMAX</u> account of a relative, friend, acquaintance or fellow <u>Employee</u> who they interact with regularly are to turn over any such business transaction to the Customer Support Team for assistance.

#### 6.3 Gifts and Entertainment

<u>ENMAX</u> and its <u>Personnel</u> shall act honestly and with integrity in all business relationships with competitors, potential business partners, suppliers, <u>Customers</u> and government officials.

<u>ENMAX</u> and its <u>Personnel</u> shall exercise good business judgment in extending business courtesies. ENMAX and its Personnel shall never accept or offer bribes, favours or "kickbacks"

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for the purpose of securing business transactions. <u>ENMAX</u> and its <u>Personnel</u> shall ensure that all payments are necessary, lawful and properly documented.

# **6.3.1** Accepting Gifts

Your supervisor must provide written approval prior to the acceptance of a gift offered with a value greater than \$300. Gifts of travel are not to be accepted under any circumstances. If a <a href="https://doi.org/10.2016/nc.10">Third Party</a> offers travel for business purposes and it would not be practicable or reasonable for <a href="https://example.com/ENMAX">ENMAX</a> to pay for it directly, your supervisor must provide written approval, including reasons, prior to acceptance. The Chair of the <a href="https://enample.com/Board of Directors">Board of Directors</a> and Chair of the Governance Committee act as "supervisor" to <a href="https://enample.com/Directors">Directors</a> for the purposes of this provision. Travel shall not be accepted from vendors.

In no circumstances should gifts of cash be given or received.

## 6.3.2 Hosting and Gifts for Government Employees or Government Agency Employees

Approval from the Vice President, Public Policy and Government Relations is required prior to issuing an invitation, or providing or offering a gift, to a government employee or a government agency employee.

#### 6.3.3 Entertainment

There is no specific value limit set for <u>Personnel</u> entertaining or hosting <u>Stakeholders</u>, industry participants, or <u>Customers</u> – nor for <u>Personnel</u> being entertained or hosted by <u>Stakeholders</u>, industry participants, or <u>Customers</u>. In either case, <u>Personnel</u> are expected to be thoughtful and exercise sound and reasonable judgment relative to their role and position at <u>ENMAX</u>.

For clarity, <u>Personnel</u> may be provided with ticket valued over \$300 to join the <u>Stakeholder</u>, industry participant, or <u>Customer</u> at an event. If the <u>Stakeholder</u>, industry participant, or <u>Customer</u> will not be attending the event with the <u>Personnel</u>, tickets are considered gifts and cannot exceed the \$300 limit for all tickets provided.

<u>Personnel</u> are encouraged to request confirmation from intended recipients of hosted events or entertainment to confirm that the event is compliant with their respective policies.

If there is any doubt about entertainment, a supervisor should be consulted. <u>Directors</u> should consult with the Chair of the <u>Board of Directors</u> and Chair of the Governance Committee for this purpose.

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Social activities that could reasonably be associated with <u>ENMAX</u> are to be conducted with propriety and with appropriate regard to all applicable <u>ENMAX</u> <u>Policies</u>, <u>Applicable Laws</u>, and must not be detrimental to <u>ENMAX's</u> reputation in the community.

## 6.4 Fair Competition

<u>ENMAX</u> believes in competing on fair terms and does not permit <u>Personnel</u> to use proprietary or confidential information from prior employers or place such information on <u>ENMAX's</u> information technology infrastructure.

Where <u>Personnel</u> have previously worked for a competitor, <u>ENMAX</u> and its <u>Personnel</u> shall not attempt to obtain the competitor's proprietary information from that individual.

<u>Personnel</u> shall not conspire with any other party to lessen fair competition or engage in anticompetitive practices including but not limited to price-fixing or bid-rigging.

<u>Personnel</u> shall not, either directly or through a <u>Third Party</u>, misrepresent <u>ENMAX</u> or offer inducements to solicit proprietary information about competitors.

<u>ENMAX</u> and its <u>Personnel</u> protect information about <u>Customers</u> of its regulated products or services from disclosure to affiliated and unaffiliated retailers where doing so would violate Applicable Laws.

<u>ENMAX</u> and its <u>Personnel</u> shall not, directly or indirectly, use outage records to trade or disclose outage records to any external party until those outage records have been made available to the public by the AESO, unless otherwise permitted under the Fair, Efficient and Openly Competitive Regulation or other <u>Applicable Laws</u>.

### 6.5 Relationships with Non-profit and Professional Organizations

<u>Officers</u> and <u>Employees</u> may perform services for an outside organization during business hours if he/she has received prior consent from a supervisor. If <u>Personnel</u> act as a spokesperson for an organization or speak publicly in a non-business capacity, it must be clear to the audience that he or she is not acting as a representative or expressing the views of <u>ENMAX</u>.

As private citizens, <u>Personnel</u> might choose to take part in the political process, a right that is respected by <u>ENMAX</u>. <u>Personnel</u>, outside of those whose responsibilities include engaging in the political process, may engage in these activities only on their own time, and participation in the political process by <u>Personnel</u> must be kept separate from their duties or association with ENMAX.

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# 6.6 Conducting International Business

This <u>Policy</u> applies to all activities carried out by <u>Personnel</u> on behalf of <u>ENMAX</u>, whether inside or outside of Canada. When conducting business outside Canada, <u>ENMAX</u> and its <u>Personnel</u> are expected to adhere to the local laws and standards to the extent that laws are not in conflict with Canadian law.

# 6.7 Anti-bribery and Anti-corruption

When conducting ENMAX business activities, <u>ENMAX</u> and <u>Personnel</u> will not make payments of any sort to <u>Public Officials</u> to obtain a favourable decision or to attract or retain business whether inside or outside of Canada.

When conducting <u>ENMAX</u> business activities, <u>ENMAX</u> and <u>Personnel</u> will never offer, ask for, give or receive any form of bribe, kickback or any other type of improper payment, or attempt to gain influence or competitive advantage through improper means. They will ensure that the requirements of all applicable anti-corruption laws are met, including, but not limited to the Corruption of Foreign Public Officials Act. <u>ENMAX</u> shall never offer or give facilitation payments.

<u>Personnel</u> must immediately report to their leader and the <u>Content Owner</u> any anti-corruption or anti-bribery "red flags" or irregularities (i.e., an indication that an agent, business partner, or contractor may have made, or intends to make an illegal offer or payment, or bribe, in connection with ENMAX business activities). Violations of applicable anti-corruption and anti-bribery laws may result in job termination, fines and reputational harm as well as criminal fines and penalties, including imprisonment, for individuals.

### 7.0 ETHICAL USE OF COMPANY PROPERTY AND INFORMATION

# 7.1 Confidential and Private Information

<u>ENMAX</u> and its <u>Personnel</u> protect confidential competitive information, <u>Customer Information</u> and <u>Personal Information</u>.

<u>Personnel</u> are responsible for knowing what information must remain in confidence and for seeking clarification from a supervisor if in doubt. In addition, <u>Personnel</u> will not disclose confidential competitive information about <u>ENMAX</u> to anyone outside <u>ENMAX</u>, including family and friends, even after leaving <u>ENMAX</u>'s employ, except in the circumstances where disclosure is required by law or by a regulatory authority. Within <u>ENMAX</u>, <u>Personnel</u> will not disclose confidential information to colleagues other than that which is required for the performance of their assigned work.

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<u>ENMAX</u> and its <u>Personnel</u> protect all confidential information against theft, fraudulent use, loss, unauthorized access and misuse. <u>ENMAX</u> recognizes that any unauthorized disclosure of confidential information exposes <u>ENMAX</u> to legal, financial, commercial and reputational liability and risks.

## 7.2 Use of Company Assets

<u>Personnel</u> share the responsibility for protecting <u>ENMAX's</u> assets, which includes physical property, data, intellectual property, credit cards, information networks and commodities, from theft, misuse, damage, loss and neglect.

Whenever <u>ENMAX</u> property is entrusted to <u>Personnel</u>, <u>Personnel</u> have full accountability for it and are required to maintain it in good condition. <u>Personnel</u> shall dispose of <u>ENMAX</u> property only in an approved manner and with the consent of <u>ENMAX</u>.

<u>ENMAX</u> time, property and services, including assets such as stationery, computers and mail services, may normally not be used for a personal or non-business reason. However, because <u>ENMAX</u> recognizes that the work done for <u>ENMAX</u> may take <u>Personnel</u> away from the personal or family aspects of his/her life, limited and reasonable personal or non-business use of these resources is acceptable where the purpose of such is lawful and not contrary to <u>ENMAX's</u> interests or <u>Policies</u>, including this <u>Policy</u>. <u>ENMAX</u> information may never be used for personal or non-business reasons and includes any work <u>Personnel</u> perform outside of <u>ENMAX</u>.

### 7.3 Accounting and Financial Reporting

All <u>ENMAX</u> financial reports, accounting records, invoices, research and sales reports, expense accounts, time sheets and other financial documents shall accurately and clearly represent the relevant facts and true nature of each transaction, and shall be retained in accordance with <u>ENMAX's</u> records retention policies and <u>Applicable Law</u>. Making false, fictitious or inappropriate entries with respect to any transaction of <u>ENMAX</u> or the disposition of any of <u>ENMAX's</u> assets is prohibited, and no <u>Personnel</u> may engage in any transaction that requires or contemplates the making of such false entries. <u>Personnel</u> are responsible for the accuracy and completeness of any reports or records created or maintained. If <u>Personnel</u> become aware of questionable or suspicious financial transactions or entries, they must disclose them to a supervisor, the Director, Compliance or by using the <u>ENMAX</u> Safety and Ethics Helpline (1-800-661-9675 or www.enmax.confidenceline.net).

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### 8.0 ETHICAL CONDUCT AS INDIVIDUAL EMPLOYEES

# 8.1 Avoiding Conflict of Interest

A <u>Conflict of Interest</u> occurs when undisclosed personal interests influence, or could appear to influence, the decisions of <u>Personnel</u> in the performance of their duties at <u>ENMAX</u>. Personal interests include matters involving <u>Personnel</u> directly, an <u>Immediate Relative</u>, or a business enterprise in which <u>Personnel</u> or their family has an interest, financial or otherwise.

<u>Personnel</u> must disclose any situation that may create a <u>Conflict of Interest</u> between personal interests and those of <u>ENMAX</u>, particularly where personal interests benefit in any way, or could appear to benefit, from business decisions or knowledge acquired at <u>ENMAX</u>. All <u>Personnel</u> have an obligation to immediately declare any actual, potential or perceived <u>Conflict of Interest</u> to their supervisor or the Director, Compliance, or in the case of <u>Directors</u>, to the <u>Board of Directors</u>.

<u>Personnel</u> shall not participate in or influence any decision by <u>ENMAX</u> where they have a <u>Conflict of Interest</u>.

<u>Directors</u> must declare any actual, potential or perceived <u>Conflict of Interest</u> to the Chair of the <u>Board of Directors</u>. It is the responsibility of each member of the <u>Board of Directors</u> to acknowledge and sign the <u>Directors'</u> Code of Conduct upon becoming a <u>Director</u> of <u>ENMAX</u> and to keep relevant information up to date by filing a *Declaration of Interest* form annually with the Corporate Secretary.

All <u>Personnel</u> must review the <u>ENMAX Conflict of Interest Standard</u> which provides direction and measures to assist <u>Personnel</u> in effectively dealing with any actual, potential or perceived <u>Conflict of Interest</u> situations which may arise during employment, during the course of performance of their duties, or when otherwise representing <u>ENMAX</u>.

### 8.2 Outside Business Activities

<u>Officers</u> and <u>Employees</u> shall not serve as directors of any organization that supplies goods or services to <u>ENMAX</u>, or competes with <u>ENMAX</u>, without the approval of a supervisor and the Content Owner.

<u>Officers</u> and <u>Employees</u> may work for another organization, including a sole proprietorship, as long as it is not a supplier, a commercial or industrial customer or a competitor of <u>ENMAX</u>, and does not affect work performance at <u>ENMAX</u>. Where it is not clear whether external work interferes with a duty to <u>ENMAX</u>, <u>Officers</u> and <u>Employees</u> are required to disclose the circumstances to their supervisor and the <u>Content Owner</u>.

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<u>Officers</u> and <u>Employees</u> shall not perform work for other organizations on <u>ENMAX's</u> time or promote any non-<u>ENMAX</u> product or service to others during working hours, without the approval of their supervisor.

<u>Personnel</u> shall not use <u>ENMAX's</u> equipment, supplies, <u>Personnel</u>, or intellectual property for the benefit of another organization, without the approval of a supervisor and the <u>Content Owner</u>. The Chair of the <u>Board of Directors</u> and Chair of the Governance Committee act as "supervisor" to Directors for the purposes of this provision.

#### 8.3 Investments

To ensure there is no <u>Conflict of Interest</u> created through personal investments, <u>Personnel</u> and their <u>Immediate Relatives</u> may not hold an ownership or financial interest in any company that competes with <u>ENMAX</u> or that sells goods and services to <u>ENMAX</u>, except as provided below.

<u>Personnel</u> may own shares in a privately owned or publicly traded company that does business with or competes with <u>ENMAX</u> provided ownership does not exceed five percent of the shares of the company.

The five percent holding restriction does not include investments held through a mutual fund or other arrangement where the <u>Personnel</u> does not directly control or dictate the timing or volume of purchases or sales of the securities.

#### 8.4 Disclosure of Investment Information

Persons or companies in possession of undisclosed information concerning <u>ENMAX</u> may not make use of such information for their own benefit or for the benefit of others. This applies to any information that could influence anyone's decisions with regard to investment in <u>ENMAX</u>, including information about <u>ENMAX's</u> performance and plans and changes to its operations and capital. <u>ENMAX</u> and its <u>Personnel</u> shall ensure that the disclosure of information about <u>ENMAX</u> to the public is timely, factual and accurate and broadly disseminated in accordance with all <u>Applicable Laws</u>. Selective disclosure of such information is improper <u>Personnel</u> shall not disclose such information to any person or company before it is publicly announced. <u>Personnel</u> shall also ensure that when information has not been publicly disclosed it remains confidential. <u>Personnel</u> shall protect such information by sharing it internally only on a need-to-know basis.

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### 9.0 POLICY ADMINISTRATION

# 9.1 Policy Management

This <u>Policy</u> shall be reviewed every three years by the <u>Board of Directors</u> and will be updated and approved by the <u>Board of Directors</u>. All new versions of the <u>Policy</u> shall be posted on Intramax once approved.

The <u>Executive Sponsor</u> may approve <u>Standards</u> relating to any matters falling within the scope of this Policy.

# 9.2 Reporting and Potential Consequences of Non-Compliance

<u>Personnel</u> are responsible for compliance with this <u>Policy</u> and any <u>Standards</u> or <u>Procedures</u> that are created pursuant to this <u>Policy</u>. Failure to comply may result in disciplinary action, investigation, or other action by <u>ENMAX</u> that may include, but it not limited to, termination of employment, or in the case of the <u>Board of Directors</u>, termination of directorship.

In addition to acting in compliance with the <u>Policies</u>, <u>Standards</u>, <u>Procedures</u>, and any <u>Applicable Laws</u>, <u>Personnel</u> have the responsibility to report to the Company any violations of <u>Policy</u>, <u>Standard</u>, <u>Procedure</u>, or any <u>Applicable Laws</u> that he or she may discover. All <u>Personnel</u> are assured that they can report such violations without fear of retribution or retaliation. Any <u>Personnel</u> who threatens, retaliates against or harasses any person who has reported in good faith a compliance concern, or is considering reporting such a concern, shall be subjected to disciplinary action, up to and including termination.

All instances of non-compliance with this <u>Policy</u> must be reported to a supervisor, the Director, Compliance, the <u>Executive Sponsor</u> directly, or by using the <u>ENMAX</u> Safety and Ethics Helpline (1-800-661-9675 or <u>www.enmax.confidenceline.net/</u>).

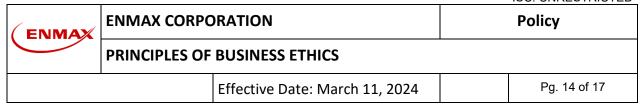
Anyone filing a complaint concerning a suspected non-compliance with this <u>Policy</u>, or with <u>Applicable Laws</u>, must be acting in good faith for believing the information disclosed indicates a suspected non-compliance. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

All <u>Personnel</u> are required to comply with requests for assistance, information or documentation in support of a suspected non-compliance investigation.

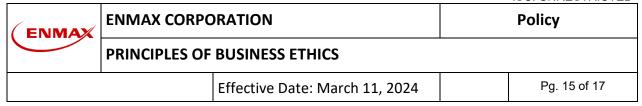
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# **SCHEDULE "A" – DEFINITIONS**

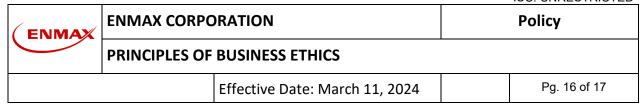
Defined Term	Definition
Applicable Laws	means all statutes, bylaws, regulations, ordinances, standards, codes, orders, decrees, restrictions, and rules (including all occupational health and safety requirements) whether federal, provincial, or municipal in origin, of all lawful authorities and applicable regulatory bodies, administrative bodies, tribunals or boards, having jurisdiction in relation to the relevant subject matter in force from time to time during the term of the relevant corporate governance document.
Board of Directors	means the <u>Board of Directors</u> of <u>ENMAX</u> Corporation.
Bribery	when someone gives or promises another person anything of value to obtain a benefit, favourable treatment or business advantage
Business Unit	means a Subsidiary or a unit of shared services headed by a member of the <u>Executive Team</u> .
Chief Executive Officer	means the President and Chief Executive Officer of ENMAX Corporation.
Conflict of Interest	occurs when undisclosed personal interests influence, or even appear to influence, a <u>Director</u> or <u>Personnel's</u> decisions in the performance of their duties at <u>ENMAX</u> .
Content Owner	means an <u>Employee</u> who has been appointed by the <u>Executive Sponsor</u> of a <u>Policy</u> to assist with the <u>Executive Sponsor's Policy</u> accountabilities as determined by the Policies, Standards, Procedures and Forms Standard.
Contract	means an agreement between two or more parties creating obligations that are enforceable or otherwise recognizable at law.
Contactor(s)	means any contractor, sub-contractor, consultant or agent engaged by or on behalf of <u>ENMAX</u> , who is not an <u>Employee</u> .



Defined Term	Definition	
Corporate Responsibility	refers to the simple principle that how we conduct our business is equally as important as the profits we earn. Corporate Responsibility demonstrates our belief in taking personal accountability for all that we do, including safety, customer care, environmental stewardship, and meaningful stakeholder and community engagement. <a href="ENMAX">ENMAX</a> and its <a href="Personnel">Personnel</a> will seek to increase competitiveness and maximize value to the shareholder while understanding and embracing corporate responsibility for the impact of <a href="ENMAX">ENMAX</a> activities on the environment, consumers, <a href="Personnel">Personnel</a> , communities and the citizens of Calgary, and all other <a href="Stakeholders">Stakeholders</a> to the extent that is reasonably achievable.	
Customer	means an individual who uses, or applies to use, <a href="ENMAX's">ENMAX's</a> products or services, where such individual is a residential Customer or an individual carrying on business alone as a sole proprietorship or in partnership with other individuals.	
Customer Information	means information that is uniquely associated with an <u>ENMAX</u> <u>Customer</u> , or could be used to identify an <u>ENMAX</u> <u>Customer</u> , and is not available to the public. This includes strategic information about a <u>Customer's</u> business.	
Director	means a member of the <u>Board of Directors</u> .	
Discrimination	means any form of unequal treatment based on grounds prohibited under the Alberta Human Rights Act and/or:  Age Creed (religion) Gender Gender Identity Sexual Orientation Family status Marital status Disability (including mental or physical disabilities) Race Ancestry Place of origin Ethnic origin Citizenship	



Defined Term	Definition	
	<ul> <li>Colour</li> <li>Record of offences (criminal conviction for a provincial offence, or for an offence for which a pardon has been received)</li> <li>Association or relationship with a person identified by one of the above grounds</li> <li>Perception that one of the above grounds applies.</li> </ul>	
Employee(s)	means a member of the <u>Executive Team</u> or any other person employed by <u>ENMAX</u> on a full or part-time basis.	
ENMAX	means ENMAX Corporation and its direct and indirect Subsidiaries, other than Versant Power and its U.S. holding companies and its direct and indirect subsidiaries.	
Executive Sponsor	is an <u>Employee</u> with specific <u>Policy</u> development and <u>Management</u> accountabilities as designated by the <u>Chief Executive Officer</u> .	
Executive Team	means the <u>Chief Executive Officer</u> and their direct reports, excluding support staff.	
Immediate Relative	means a spouse, partner in an adult interdependent relationship as defined in the Adult Interdependent Relationships Act (Alberta), intimate partner, children, brothers, sisters, parents, grandparents, and children, brothers, sisters, parents, or grandparents of spouses or partners in an adult interdependent relationship, including adopted, adoptive, foster, or step, as the case may be. For the purposes of this <u>Policy</u> , such an individual is an Immediate Relative whether or not the individual is currently living with the <u>Personnel</u> .	
Management	means an Employee who performs management functions for ENMAX.	
Officer(s)	means a member of the <u>Executive Team</u> .	
Personal Information	means information about an identifiable individual, but does not include aggregated information that cannot be associated with a specific individual.	



Defined Term	Definition
Personnel	means <u>ENMAX Board of Directors</u> , <u>Executive Team</u> , <u>Employees</u> and <u>Contractors</u> .
Policy / Policies	is/are principle based document(s) that contain information and direction in relation to the values and fundamental expectations of <a href="ENMAX">ENMAX</a> .
Procedures	are documents designating the steps or processes that provide specific direction in order to achieve a uniform approach to executing a work or business activity. Procedures are composed of steps which, when not executed in a specific order may result in an impact to health, safety, environment, customer service or business (operational, financial, regulatory, etc.) performance.
Public Officials	persons including those who are appointed or elected to discharge a public duty, or persons who hold a position under government or a public department. It also includes elected Chief and Council of First Nation communities.
Stakeholder(s)	means people, groups of people, and organizations that may reasonably affect, be affected by, or perceive themselves to be affected by an ENMAX decision, or business activity
Standard(s)	is a document providing further direction, guidance and requirements that provides greater detail than that provided in a <u>Policy</u> , and reflects <u>Management's</u> expectations.
Third Party	means an individual or organization outside of ENMAX.

ENMAX CORPOR		PRATION		Policy
	PRINCIPLES OF BUSINESS ETHICS			
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# **SCHEDULE "B" – REVISION HISTORY**

Rev No.	Effective Date	Revision History
6	March 11, 2024	Amendments to expand the Anti-bribery and Anti-corruption section. Edits to section 6.2 to reflect current practices in Customer Care. Clarifying treatment of hosted entertainment/tickets. Modify language throughout document to clear up ambiguities.
5	March 25, 2021	Amendments to modify language to increase the value of a gift that can be accepted without supervisor written approval, as well as updated some definitions to ensure defined terms have consistent definitions among the governing document.
4	November 13, 2020	Definitions for Company, ENMAX and Subsidiaries updated with the acquisition of Versant Power.
3	March 26, 2020	Add paragraph to 6.4 to include the prohibition of using proprietary information from a previous employer without the previous employer's consent. Edit some definitions to match the master definition list.  Various edits to clean up language.
2	November 30, 2018	Board required review Policy refresh and update Replaced Content Owner with Director, Compliance Update to address Bill 13
1	November 5, 2015	Included 'Directors" in definition of "Personnel".  Replaced VP, Corporate Responsibility with VP, Legal Services.