



## Vermilion Energy Inc.

### Supplier Code of Conduct

Vermilion Energy Inc. and its subsidiaries (“Vermilion”, the “Corporation” or “Company”) is an international company that responsibly produces essential energy while delivering long-term value to our people, shareholders, customers, partners, and communities. This includes working with organizations and individuals that share our approach to responsibility.

This Supplier Code of Conduct (“the Code”) outlines ethical and business conduct requirements for Suppliers, Contractors, Agents, and other partners (“Suppliers”) that provide Vermilion with goods, services, or human resources, and is to be used in conjunction with other Vermilion policies that apply to Suppliers.

Suppliers must abide by the following elements of the Code, ensure that they are understood by all those working with Vermilion within their business, and ensure similar measures are in place within their supply chain.

#### Compliance and Ethical Business Conduct

- Comply with all applicable laws, rules, regulations, directives, orders, practices and policies and generally accepted international standards (“Applicable Law”) in the jurisdictions in which they operate.
- Comply with all applicable Vermilion policies, procedures, and guidelines as provided by Vermilion to Suppliers from time to time and as may be updated from time to time (“Vermilion Policies”)
- Exercise zero tolerance for illegal and unethical practices:
  - Prohibit corruption, bribery, fraud, money laundering, extortion and facilitation payments and other types of improper payments or any other form of corruption, including anti-competitive behaviour and conflicts of interest.
  - Exercise good judgement in dispensing or receiving gifts and entertainment of nominal value that may be considered normal business courtesies and do not create a sense of obligation.
- Prohibit insider trading by individuals or their associates using information that has not been publicly disclosed by Vermilion that has the potential to influence the stock price of an entity.
- Maintain the confidentiality of all sensitive, proprietary and non-public information concerning Vermilion or its business partners, other than in the necessary course of business.
- Obtain Vermilion’s permission before referencing Vermilion publicly, issuing or using images or logos of Vermilion operations or people, on social media or otherwise.



### **Health, Safety and Environment (HSE)**

- Comply with all Vermilion Policies and Applicable Law in each jurisdiction regarding health, safety and the environment. Vermilion's priorities are health and safety, the environment, and profitability, in that order. Nothing is more important to us than the safety of the public and those who work with us, and the protection of our natural surroundings, and we expect the same of our Suppliers.
- Have appropriate management systems in place, consistent with industry standards or applicable regulatory requirements, as may be supplemented by Vermilion Policies, to minimize safety, health and environmental risks.
- Have policies and processes in place to: prevent spills and pollution; responsibly manage greenhouse gas emissions, energy use, water use especially freshwater, and waste; protect biodiversity; and minimize any adverse environmental impacts of their products or services.

### **Human Rights**

- Comply with Vermilion Policies and Applicable Law on human rights, whichever are stricter. Vermilion is committed to respecting human rights as represented by the United Nations Universal Declaration of Human Rights and the Conventions of the International Labour Organization.
- Respect and consider the rights, traditions, and cultures of Indigenous Peoples in operating areas that include their territories, traditional and otherwise, and ensure engagement and consultation that upholds their rights
- Have processes in place to identify and mitigate human rights risks and violations within its own operations or its supply chain, as informed by the UN Guiding Principles on Business and Human Rights, including risks of modern slavery, forced labour and child labour, while respecting rights of freedom of association and collective bargaining.
- Treat employees and others with respect and dignity, adhere to all Applicable Law and Vermilion's Policies regarding hours, minimum wages, overtime hours and legally mandated benefits, and limit working hours and overtime to levels that are humane and safe.
- Have processes in place to ensure that no worker is subject to discrimination or harassment on the basis of grounds as prohibited by law in our jurisdictions and those grounds that are analogous, including grounds in Vermilion Policies.
- Take reasonable best efforts to confirm that materials used in products supplied to Vermilion do not contain conflict resources, such as metals derived from minerals that originated from a conflict region, directly or indirectly benefit armed groups, or contribute to modern slavery, including forced and child labour.



## Community

- Respect the rights of local communities, landowners, governments, and other stakeholders, including providing information in a transparent and timely manner and engaging in good faith with the objective of achieving mutually beneficial outcomes, and respected their roles as our hosts, partners and neighbours when representing Vermilion operations.
- Where concerns are raised, use best available means to mitigate or lessen the concern through dialogue and action, including identifying those concerns to a Vermilion representative so that resolution can be reached in a timely and respectful manner.

## Due Diligence and Reporting

Vermilion is committed to supporting our Suppliers to meet the standards laid out in this Code. We will work to ensure that this Code and other policies are understood and applied by suppliers, contractors, and others with whom we work. If there is a conflict between this Code and Vermilion's existing Policies, to the extent that the SCC imposes additional obligations or requirements over and above those contained in the Policies, Suppliers will be expected to comply with both the Policies and the SCC.

Vermilion will conduct due diligence as necessary, including assessing compliance with this Code, as part of our decision-making relating to evaluation, selection, and management of Suppliers. Notwithstanding any other agreements, we reserve the right to discontinue business with Suppliers for cause, including the failure to address concerns around workplace practices and instances of non-compliance with this Code or other Vermilion policies, particularly where non-compliance may constitute risk for Vermilion or others.

Suppliers are required to disclose any known instance of non-compliance with this Code. Any person who becomes aware of, or suspects, a violation of this Code must promptly report the matter to a designated Vermilion representative, Vermilion Compliance Officer (our General Counsel & Corporate Secretary), or the confidential Whistleblower option that is available 24/7 at [vermilionenergy.com](http://vermilionenergy.com). Vermilion strictly prohibits retaliation against good faith reporting of such violations, or participating in making a good faith complaint of such.