



Political Contributions and Communicating with Government Officials

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Summary of Changes

This Summary shows:

- The location of each change within the document
- All changes to this document since it was last approved and published

Location of Change	Summary of Change
Entire Document	This is the initial revision of the document.



R# Requirements changed in the new revision will be identified with a revision triangle beside it.



Contents

Summary of Changes	2
Contents	3
1 About this Standard	4
Purpose	4
Scope	4
Target Audience	4
Conformance Expectations	4
2 Requirements	5
2.1 Political Contributions	5
Directing Contributions	5
Budget Process	5
Restrictions	6
2.2 Communicating with Government Officials	7
Suncor Leadership	7
Communications with Government Officials	7
Personal Interactions with Government	8
Internal Reporting	8
Government Reporting and Registration	9
2.3 Roles and Responsibilities	10
Government Relations	10
Vice President, Government Relations	10
Suncor Leadership	10
Government Liaisons	10
2.4 Measurements and Verification	11
Political Contributions Measure	11
Political Contributions Verification	11
Communication with Government Officials Measure	11
Communications with Government Officials Verification	11
3 Terms and Definitions	12

1 About this Standard

Purpose

The purpose of this standard is to guide Suncor’s Political Contributions and Communications with Government Officials within Canada.

Suncor believes Political Contributions:

- Support the democratic process in communities where we operate
- Enable a healthy dialogue related to policy options and governance

Suncor also believes that Communications with Government Officials (also known as lobbying):

- Improves government decision-making through open dialogue between government, stakeholders and industry
 - Better informs Government Officials about Suncor, the energy industry, and the effects of government policies
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Scope

This Standard provides the requirements to ensure Political Contributions and Communications with Government Officials comply with all laws and are in line with Suncor’s

- Corporate strategy
 - Corporate code of conduct
 - Values
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Target Audience

This Standard applies to Suncor Energy Inc. and subsidiaries over which Suncor has operational control (collectively “Suncor” or “the company” or “enterprise-wide”).

As used in this document, “Suncor personnel” includes directors, officers, employees, contract workers, consultants and agents of Suncor.

Conformance Expectations

Conformance to this standard is required upon the date of approval.

In addition to what is provided for in this Standard, Suncor Personnel must comply with the requirements of applicable laws and regulations relating to the matters covered by this Standard.

If a deviation to this standard is required you must follow the Governing Document Framework deviation process.

2 Requirements

2.1 Political Contributions

Directing Contributions

The following requirements outline the high level direction for political contributions.

- 2.1.1 Suncor shall direct political contributions to jurisdictions where there are issues pertinent to Suncor's business interests
 - 2.1.2 Suncor shall direct all Political Contributions, where possible, towards events where Suncor employees can participate
 - 2.1.3 Political Contributions shall not be exchanged for any political or policy benefit to Suncor
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Budget Process

The following criteria outline the requirements for setting the Political Contributions budget.

- 2.1.4 Government Relations shall manage all Political Contributions on behalf of Suncor
 - 2.1.5 The Vice President, Government Relations shall propose a political contributions budget to be approved by the Executive Vice President, Business Services, as per the normal Suncor budgeting cycle
 - 2.1.6 At the beginning of each calendar year, the Government Relations unit shall draft an informational memo to the Vice President, Government Relations, which will include:
 - Up-to-date legal Political Contribution limits for each jurisdiction
 - Recommended Political Contributions and their rationale for each party in each jurisdiction
 - The current seat count and distribution by jurisdiction
 - The previous year's recommended and actual Political Contribution numbers
 - 2.1.7 The Vice President, Government Relations shall review and approve the memo prior to any Political Contributions being made
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Restrictions

The following requirements outline the restrictions to Political Contributions.

- 2.1.8 The Government Relations unit shall track all Political Contributions made on Suncor's behalf
- 2.1.9 Suncor shall only make contributions to the constituency associations of sitting legislators or to political parties that have at least one member in the legislature
- 2.1.10 Suncor shall not endorse any political parties, ideologies, or candidates
- 2.1.11 No employees, except those authorized by the Vice President, Government Relations, shall make a contribution on behalf of Suncor
- 2.1.12 All contributions shall be made in compliance with all applicable laws and statutes
- 2.1.13 Suncor shall not make Political Contributions to parties and candidates during their election period
- 2.1.14 All Political Contributions must be made from the Government Relations unit's budget and cost centre

Note: The Government Relations unit applies a strict criteria when determining whether to make a Political Contribution including:

- The current economic climate
- Suncor's strategic interests
- The potential effects to Suncor's reputation
- The availability of Suncor employees to attend the fundraiser
- Other factors as determined by the Vice President, Government Relations

- 2.1.15 Suncor shall not make contributions exceeding the annual legal limit
 - 2.1.16 In the event that Suncor makes a Political Contribution that is larger than the annual legal limit, the Government Relations unit shall request a refund of the excess Political Contribution
 - 2.1.17 Suncor shall not make Political Contributions at the municipal level
 - 2.1.18 The restrictions outlined in this section shall not apply to contributions made to self-government in Canada
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2.2 Communicating with Government Officials

Suncor Leadership

The following criteria outlines the requirements for Suncor Leadership (see definition in Section 3):

- 2.2.1 Suncor leadership shall
- Appoint Suncor Personnel to act as Government Liaisons
 - Ensure all required training has been completed before a Government Liaison on their team interacts with a Government Official on Suncor's behalf
- 2.2.2 Suncor leaders must inform the Government Relations unit of the appointment or change of all designated Government Liaisons as they occur
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Communications with Government Officials

The following criteria outlines the requirements for communicating with Government Officials:

- 2.2.3 For the purpose of this document, the following rules shall only apply to communications with senior Government Officials (as defined in Section 3) when discussing issues pertinent to Suncor
- 2.2.4 All Government Liaisons shall submit a monthly report to the Government Relations unit specifying all communications with Government Officials
- 2.2.5 All Government Liaisons shall inform the Government Relations unit if more than 20% of their time is spent interacting with Government Officials
- 2.2.6 Prior to any planned communication with a Government Official on behalf of Suncor, all Government Liaisons shall:
- Obtain an approval by Suncor Leadership to act as a Government Liaison
 - Complete the Government Liaison training module, available in the Suncor Learning Solution (LSO)
 - Inform the Government Relations unit and acquire approved messaging and briefing materials prior to communication with a Government Official
 - Disclose to the Government Relations unit any prior involvement with all levels of government including previous roles and potential conflicts of interest
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Personal Interactions with Government

The following requirement applies to Suncor Personnel interacting with government outside of work:

- 2.2.7 Suncor Personnel shall not interact with Government Officials on behalf of Suncor unless they have been designated a Government Liaison by their leader

Note: All Suncor Personnel may interact with government for personal reasons

- 2.2.8 If a discussion with a Government Official involves the energy sector, Suncor Personnel must:

- Disclose to the Government Official that they are an employee of Suncor
- Inform the Government Official that they do not speak on behalf of Suncor

- 2.2.9 Suncor Personnel shall inform Government Relations if they are seeking public office
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Internal Reporting

The following requirement outlines internal reporting requirements within Suncor:

- 2.2.10 The Government Relations unit shall maintain a record of all communications with Government Officials for the following reasons:

- To ensure legal compliance
- To establish corporate memory

- 2.2.11 Each Government Liaison is required to submit a monthly report indicating if communication with a Government Official has occurred and what issues were discussed

- 2.2.12 In the cases where more than one Suncor employee is present, the most senior Government Liaison participating in the Communication shall designate the Suncor representative responsible for reporting that communication

- 2.2.13 If a Government Official is present at an industry committee meeting, the Government Liaison must include that communication in his or her monthly report

- 2.2.14 Government Relations shall send out a monthly reminder for all Government Liaisons to submit their monthly report

- 2.2.15 The Government Relations unit shall maintain a database of government stakeholders and interactions in Suncor's Stakeholder Information Management System (SIMS)

- 2.2.16 The Government Relations unit shall send out an annual reminder to all senior leaders to update their list of Government Liaisons

- 2.2.17 The Government Relations unit shall maintain a list of all government liaisons on their internal team website
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**Government
Reporting and
Registration**

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The following requirement outlines the reporting that is required to various governments:

- 2.2.18 The Government Relations unit is responsible for fulfilling any and all reporting and registration requirements on behalf of the company
 - 2.2.19 The Government Relations unit must ensure all relevant submissions are made to the respective authorities in each jurisdiction on a timely basis
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2.3 Roles and Responsibilities

Government Relations

The following outlines the Government Relations responsibilities.

- 2.3.1 Government Relations shall proactively communicate the rules outlined in this standard
 - 2.3.2 Government Relations shall complete all legal government registration and disclosure on behalf of the company
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Vice President, Government Relations

The following outlines the Vice President, Government Relations responsibilities.

- 2.3.3 The Vice President, Government Relations shall set an annual Political Contributions budget.
 - 2.3.4 The Vice President, Government Relations shall approve the overall allocation of Political Contributions by jurisdiction and political party
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Suncor Leadership

The following outlines the Suncor Leadership responsibilities.

- 2.3.5 Suncor Leadership shall appoint Suncor personnel to act as Government Liaisons.
 - 2.3.6 Suncor Leadership shall ensure all Government Liaisons on their team have been registered with Government Relations and have completed all required training prior to interacting with a Government Official
 - 2.3.7 Suncor Leadership shall inform Government Relations if any member of their team should be unregistered as a Government Liaison
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Government Liaisons

The following outline the Government Liaisons responsibilities.

- 2.3.8 Government Liaisons shall provide a monthly report to Government Relations detailing all Communications they have had with Government Officials
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2.4 Measurements and Verification

Political Contributions Measure

The following provide the measures that will be tracked for Political Contributions.

- 2.4.1 Government Relations shall track and keep a record of all Political Contributions made by Suncor
 - 2.4.2 Government Relations shall produce a memo with up-to-date legislative contributions limits annually
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Political Contributions Verification

The following outline how the political contribution measures will be verified.

- 2.4.3 The Government Relations unit shall produce a quarterly report reconciling the Political Contributions publicly disclosed by political parties to Suncor totals
 - 2.4.4 Government Relations shall have Legal verify the political contribution limits annually to ensure ongoing legal compliance with all applicable legislation
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Communication with Government Officials Measure

The following provide the measures that will be tracked for communications with government officials.

- 2.4.5 Government Relations shall maintain a database of all Government Liaisons
 - 2.4.6 Government Relations shall produce an annual memo outlining the applicable laws for Communicating with Government Officials in each jurisdiction where Suncor operates
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Communications with Government Officials Verification

The following outline how the communication with government official measures will be verified.

- 2.4.7 Government Relations shall verify the list of Government Liaisons with Suncor Leadership annually
 - 2.4.8 Government Relations shall have Legal verify the applicable laws for Communicating with Government Officials
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3 Terms and Definitions

Term	Definition
Communications	<p>Planned or unplanned interaction with government including, but not limited to:</p> <ul style="list-style-type: none"> • Email • Face-to-face discussion • Writing a letter • Telephone calls
Political Contribution	<p>Any financial contribution to a political party, constituency association, or candidate. Note: This includes the purchase of tickets to a political fundraiser (e.g. golf tournaments, leader’s dinners etc.)</p>
Suncor Leadership	<p>A Suncor employee in the position of Vice President or higher.</p>
Suncor Personnel	<p>Any directors, officers, employees, contract workers, consultants and agents of Suncor.</p>
Government Liaison	<p>A Government Liaison includes all members of the Executive Leadership Team, and anyone who has been approved by his or her respective Vice President to communicate with the government on behalf of Suncor.</p>
Government Official	<p>A senior government official including:</p> <ul style="list-style-type: none"> • Members of Parliament • Senior public servants, such as Deputy Ministers, Assistant Deputy Ministers, or their equivalents (such as the senior leadership of a crown corporation or regulatory body) • Members of Provincial Parliament (Members of the Legislative Assembly, Members of the National Assembly, Members of the House of Assembly) • Any political staff to a cabinet minister



The following individuals have approved and signed this document.

Name: Ginny Flood

Title: VP Government Relations

Date: Monday, 2 November 2015

*Approval was supplied via [pen to paper signature](#)