

Anti-Fraud Policy

Ovintiv is committed to protecting its reputation, information and assets from fraud. Fraud refers to any intentional act or omission designed to deceive Ovintiv or others to secure a benefit, and also includes fraud as defined by law.

This Policy applies to all individuals engaged in Ovintiv's business including all **employees, contractors** and directors. Contractors are expected to develop and enforce with their staff their own anti-fraud policies and practices that are consistent with this Policy.

Any individual who has knowledge of an occurrence of fraud, or suspects that a fraud has occurred, must **immediately** notify their **supervisor**, Human Resources Advisor or the Integrity Hotline. Supervisors must immediately report such information in accordance with the Investigations Practice. Retaliation will not be tolerated against any individual who reports lawfully a suspected fraud in accordance with the Investigations Practice.

Ovintiv will investigate all fraud and suspected acts of fraud in accordance with the Investigations Practice. Ovintiv is entitled to recover losses by any legal means, including court-ordered restitution, to recover losses from the offender or other sources.

Violations of this Policy may result in disciplinary action up to and including termination of employment or contract, as applicable. Violations of this Policy may also be a violation of the law and could result in civil or criminal penalties.

**Terms bolded and italicized in a policy or practice are defined in the Policies & Practices Glossary and such definitions are incorporated by reference into such policy or practice to the extent used therein.*