

## MEG Energy Corp. Lobbying and Advocacy Policy

**Effective Date:** September 12, 2019

MEG Energy Corp. (“MEG”) has adopted a *Business Conduct Charter* which sets out key principles shared by MEG representatives in conducting business ethically. The *Lobbying and Advocacy Policy* (the “Policy”) has been developed to ensure that all stakeholders of MEG understand, and all representatives of MEG understand and comply with, MEG’s policies relating to lobbying and to industry memberships and associations. This Policy applies to the directors, officers, employees and consultants of MEG and of any affiliate of MEG (collectively, the “Representatives”).

### **Purpose**

MEG is committed to maintaining and enforcing the highest standards of ethics and professionalism. This applies to governance practices in general, and includes MEG’s activities relating to public policy, including its participation in industry groups, lobbying and political contributions.

### Memberships and Associations

MEG’s memberships and associations provide MEG with new ideas, expertise and perspective, as well as ensure MEG is informed as to industry issues and what is important to stakeholders, to the benefit of shareholders and stakeholders. They also enable MEG to provide its views on industry issues and initiatives, again to the benefit of shareholders.

MEG’s goal is to align its selection of industry groups it participates in with public policy positions that MEG supports. Although MEG evaluates and selects its memberships and associations based on this goal, it does not mean that MEG will agree on every position taken by any such organization or group. Memberships in and associations with industry groups are approved by either the CEO or the General Counsel.

MEG believes in keeping stakeholders informed and being transparent as to how MEG participates in public policy. As such, MEG discloses a list of industry group memberships that it maintains to which MEG pays annual dues greater than \$5,000 and which may participate in lobbying activities.

### Lobbying

MEG complies with all applicable laws respecting lobbying, including the *Lobbying Act* (Canada) and the *Lobbyists Act* (Alberta). In connection with applicable laws and regulations, MEG maintains the required registrations of lobbying communications with public office holders, including reporting of employees who are lobbyists for or on behalf of MEG. MEG maintains internal procedures and protocol for ensuring such compliance.

Political Contributions

MEG does not make contributions, financial or in kind, to political parties, committees or candidates and does not expressly support or advocate on behalf of such political parties, committees or candidates. Representatives of MEG may make political contributions or become involved in political activities provided such contributions and activities are undertaken on their own behalf, on a personal level, and not as a representative of MEG.

Acknowledgement and Compliance

All Directors, Officers and employees of MEG are required to acknowledge their understanding of and compliance with this Policy:

- a) upon appointment to their position, and/or the commencement of their employment with MEG, and,
- b) annually thereafter.

It is important to all of us that our commitment to the principles in this Policy are shared by those who we do business with, so our third-party contractors and consultants are contractually expected to abide by those same principles.