



Title: Anti-Corruption Policy

Program Area: Government Relations (GOV)

Number: EMA-GOV-POL-01-3

Adopted by: Emera Inc, and its subsidiaries (the “Emera Company”)

Owner: Corporate Compliance

Effective: 10/01/2025

Last Reviewed: Q3 2025

Supersedes: EMA/TECO/GBP/BLP-GOV-POL-01-1 (01/01/2020); EMA-GOV-POL-01-2 (01/01/2023)

1. Purpose and Objective

The purpose of this Policy is to ensure that no employee or director of the Emera Company, offers, promises, authorizes, or gives a Bribe or “Anything of Value” directly or through a third-party, to a Government Entity or Government Official for an Improper Business Purpose.

2. Scope

Compliance with this Policy is mandatory for all employees and directors in all business units across the Emera Company.

3. Defined Terms

Bribe or “Anything of Value”: An advantage or benefit including, but not limited to, economic benefits to a Government Official or their family member(s) such as, cash, stocks, property, home improvements, vacations, vehicles, plane or other travel tickets, expensive jewelry, charitable or political contributions, kickbacks, travel and business entertainment, gifts, an internship or other employment, or a scholarship.

Corruption: Dishonest or fraudulent conduct by those in power, typically involving bribery.

Facilitation Payment: A small Bribe such as cash, vouchers, pre-paid phone cards, alcohol, perfume, cigarettes, or tickets to events provided to a Government Official to secure or expedite the performance of a routine or necessary government action.

Government Entity: Includes any national, state, provincial, regional, municipal, or local government (including their agencies, subdivisions, or departments), political parties, indigenous groups, international organizations (e.g., the United Nations or World Bank), and entities or businesses owned or controlled by

the bodies listed above.

Government Official: Includes any elected, nominated, appointed, or employed director, officer, employee, agent, leader, representative or anyone otherwise acting in an official capacity on behalf of a Government Entity, political party officials or employees, candidates for public or political office, royal or ruling family members; or any agent or representative of any of those persons listed above.

Improper Business Purpose: Includes any circumstance where a Bribe, Facilitation Payment, or other thing of value is authorized, offered, promised, or provided to a Government Official directly or through a third-party to improperly influence this Official in order to retain or obtain business (e.g., win projects or contracts), or secure an improper advantage (e.g., cause a legislative or regulatory change; obtain a decrease in customs duties or a tax concession; assure satisfaction of tender eligibility requirements, etc.).

Intermediaries: Employees, consultants, lobbyists, vendors, or other representatives employed or retained to engage/liase with Governmental Entities and/or Officials on the Emera Company's behalf including:

- **Business Development:** direct or indirect business development engagements and agreements.
- **Executive:** Emera Company officers and related senior management roles.
- **Government Account Management:** the management of government accounts.
- **Government Relations:** lobbying and/or government and community relations activities on behalf of the company.
- **Permits & Permissions:** the obtainment of permits, permissions, and approvals for operating activities including public rights of way use, land use, environmental, etc.
- **Regulatory Affairs:** regulatory activities, proceedings, audits, or enforcement actions on behalf of the Company.

4. Policy

It is the policy of the Emera Company that no employee or director of the Company, or third party acting on its behalf, shall offer, promise, authorize, or give a Facilitation Payment, Bribe or "Anything of Value" to a Government Entity or Government Official for an Improper Business Purpose.

Existing laws such as the Foreign Corrupt Practices Act (FCPA) in the US and the Corruption of Foreign Public Officials Act (CFPOA) in Canada generally prohibit companies and individuals from offering, promising, authorizing or giving bribes, kickbacks, or "anything of value," directly or through a third-party, to a Government Entity or Government Official, or any agent or representative thereof, to obtain or retain business, or secure an Improper Business Purpose. The Emera Company is not just committed to following the applicable Anti-Corruption laws; the Emera Company seeks to operate its business fairly and to the highest ethical standards.

Employees and directors must exercise heightened caution when offering or accepting gifts, hospitality, or entertainment, particularly when interacting with government officials or public sector representatives. Providing anything of value to a government official, even unintentionally, can violate anti-corruption laws and expose both the individual and the Emera Company to serious legal and reputational risks. It is essential to be aware of who qualifies as a Government Official. When in doubt, employees should seek guidance

from Legal or Compliance before proceeding. Transparency and sound judgment are key to maintaining our commitment to ethical conduct.

The Emera Company is committed to conducting business only with reputable third parties who share our values of integrity and compliance. Before engaging any third party, the Emera Company will ensure that appropriate due diligence is conducted to assess the risk of corruption, which may include verifying the third party's background, ownership structure, reputation, and connections to Government Officials. Failure to conduct proper due diligence can expose the company to significant legal and reputational risks.

5. Responsibilities

All Employees & Directors are responsible for adherence to this Policy.

Accountable Executives are responsible for overall oversight and execution of this Policy.

Compliance Officers are responsible for ensuring that appropriate risk mitigation activities occur consistent with this Policy, and the nature, scale and potential corruption risks of its respective operations and legal requirements.

Compliance serves as a key contributor and advisor in anti-corruption due diligence activities, investigations into potential instances of corruption and/or bribery.

Employees Designated as Intermediaries are responsible for ensuring their conduct within their intermediary role always adheres to this policy and that they actively participate and engage in the Company's anti-corruption training program.

Enterprise Risk Management serves as a key contributor in anti-corruption due diligence activities by performing corruption background screenings on behalf of the Emera Company.

Legal serves as a key contributor and decision maker in anti-corruption due diligence activities including the review of all applicable Intermediary and related contracts.

Procurement & Purchasing are responsible for ensuring anti-corruption due diligence is performed during procurement engagements with third parties.

6. Exceptions & Consequences

For greater certainty, it is common practice for indigenous groups in Canada (i.e., First Nations) to receive capacity payments and/or to be compensated for potential impacts relating to their indigenous rights or cultural advancement. Such payments and compensation are not a violation of this Policy.

Reported violations of this Policy by Emera Company employees or directors will be investigated and may result in disciplinary action up to and including termination of employment. Additionally, employees and directors could face severe criminal liability in the form of significant fines and penalties (including prison

terms for individuals). Failure to report in good faith a suspected violation of this Policy may also result in disciplinary action for employees.

7. Inquiries

The Emera Company shall support a reasonable and effective means for the reporting of Anti-Corruption-related issues and incidents. At a minimum, questions and/or concerns may be directed to the Emera Company's legal or compliance department.

Reports of suspected corruption or bribery incidents may also be submitted directly to an immediate supervisor or anonymously by using [Emera's Ethics Hotline](#).

General compliance inquiries should be sent to: Corporate.Compliance@emera.com.