Title: Compliance Management System Policy

Program Area: Compliance Management System (CMS)

Number: EMA-CMS-POL-01-3

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

Owner: Corporate Compliance

Effective: 07/01/2026

Last Reviewed: Q2 2026

Supersedes: EMA-CMS-POL-01-2 (04/01/2023)

1. Purpose and Objective:

The Emera Company is committed to conducting business with high regard for the spirit and letter of the law by ensuring compliance with all federal, state, provincial, and local laws, rules, and regulations.

To support this commitment and reduce the risk of non-compliance, this Policy establishes the Emera Company's use of a standardized, systematic, and risk-based approach to compliance through Emera's Compliance Management System (CMS). The CMS is designed to effectively and efficiently manage the Emera Company's Compliance Obligations.

2. Scope:

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

3. Defined Terms:

Compliance Obligation: A legal, regulatory, or other mandate that an Emera Company is required to comply with or a requirement from an adopted internal or external standard.

Compliance Program: An organization of compliance obligations, risks, and controls for purposes of assigning ownership and accountability in business operations.

Emera Company Compliance Program Management Plan ("Management Plan"): A governance document that describes how an Emera Company manages its applicable Compliance Programs in alignment with the principles of this Policy.

4. Policy:

The Emera Company is committed to maintaining an effective Compliance Management System (CMS) that supports enterprise-wide compliance with applicable laws, regulations, and other compliance obligations. This commitment is reflected in a consistent, risk-based approach to compliance oversight, accountability, and performance measurement, with appropriate engagement by senior management and the Board of Directors.

The CMS is rooted in the following principles, which guide how the Emera Company, its leadership, and employees identify, manage, and oversee compliance risks and obligations in support of the purpose and objectives of this Policy:

- **Culture of Compliance:** The Emera Company fosters a strong culture of compliance consistent with the principles set out in the Code of Conduct. This includes a shared commitment to ethical and compliant behavior, clear management accountability, and an environment that encourages employees to speak up about actual or potential compliance concerns without fear of retaliation. The Emera Company prohibits retaliation against any employe for a good faith disclosure of an actual or potential compliance concern.

- **Leadership Commitment & Support:** Leadership at all levels of the Emera Company is responsible for demonstrating visible and sustained commitment to compliance. This includes providing appropriate resources, setting clear expectations, and actively supporting compliance activities as an integral part of the Company's operations and strategy.

- **Governance & Accountability:** The Emera Company maintains a governance and accountability structure that supports effective oversight of compliance activities. This structure includes defined roles and responsibilities, periodic engagement by senior leadership and the Board of Directors, and forums for addressing compliance performance, incidents, and continuous improvement.

- **Effective Program Design:** The Emera Company organizes and manages Compliance Obligations through a Compliance Program register and Management Plan that outlines systematic and risk-based processes designed to support effective execution, including:

    - identification and management of compliance obligations;
    - assessment and management of compliance risks;
    - design and implementation of compliance controls, including policies, processes and procedures, defined deliverables, training and communications;
    - identification and management of compliance incidents; and
    - change management to address evolving regulatory and business requirements.

- **Program Performance:** The Emera Company evaluates the effectiveness of compliance activities using clear, meaningful, and actionable metrics. Compliance performance is analyzed and reported periodically to support oversight by the Board of Directors, the Compliance Officer, and Accountable Executives, and to drive continuous improvement.

  Compliance activities, controls, testing, incidents, and certifications shall be documented and retained in accordance with Company recordkeeping requirements.

Emera relies on employees to support an effective Compliance Management System by acting with integrity, complying with Company policies and legal requirements, and raising concerns when issues arise. Employees are encouraged to speak up about potential compliance issues so they can be addressed and resolved, without fear of retaliation.

Compliance incidents, audit findings, and identified control deficiencies shall be remediated through documented corrective action plans with defined owners and timelines and tracked to completion. Significant compliance incidents or systemic control failures shall be escalated promptly to senior management and, where appropriate, to the Board of Directors or its Audit Committee.

5. Responsibilities:

All employees are responsible for speaking up about actual or potential compliance concerns and for overall adherence to this Policy.

Accountable Executives are responsible for overall execution of this Policy within their area of responsibility by overseeing the performance of their Compliance Programs through ongoing oversight and engagement with their Compliance Program Managers.

Audit Services is responsible for performing audits of compliance programs as appropriate based on risk assessment and audit planning.

Compliance Program Managers are responsible for the management of their applicable Compliance Programs in accordance with this Policy and their Emera Company's Management Plan, including informing their Accountable Executive of their program's performance through ongoing engagements.

Compliance Management System Administrators are responsible for working with Compliance Program Managers and Corporate Compliance in the administration of Emera's GRC software including supporting the business in day-to-day use of the software, tracking compliance deliverables, managing users and access, and implementing system configuration changes.

Compliance Officers are responsible for providing oversight of the Emera Company's compliance activities, coordinating participation in corporate compliance assessments and performance reporting activities, leading investigations of non-compliance, and providing overall compliance leadership.

Legal, Compliance & Regulatory provide subject-matter expertise to support compliance oversight and investigations and provide guidance to Compliance Program Managers and Accountable Executives.

6. Exceptions & Consequences:

Failure to follow this Policy or the applicable Emera Company's Compliance Program Management Plan may result in violations of a law, rule or regulation, which may jeopardize the reputation and business interests of the Company and can result in personal and corporate liability.

7. Inquiries:

Questions, concerns, or inquires related to this Policy should be directed to Emera's Corporate Compliance team: Corporate.Compliance@emera.com.