



SUPERIOR PLUS CORP.

CRISIS PREPAREDNESS AND COMMUNICATION POLICY

First Approved by Board: November 7, 2018	Policy Review Cycle: Annually
Current Version Approved by Board: August 12, 2025	Responsible Executive: Chief Commercial Officer, North American Propane, and Senior Vice-President and Chief Legal Officer
Supersedes Version Approved: November 7, 2024	

Purpose

The purpose of this Policy is to outline the minimum standard for crisis preparedness, and to describe the communication protocol expectations for the Superior Group during a Crisis Event. The goal is to:

1. reduce the risk to the Superior Group from injury, loss and damage to the public, its employees, its property, its systems and the environment as a result of natural or human-caused emergencies; and
2. facilitate the Superior Group's effective communication with its shareholders and other stakeholders and minimize any negative impact to its reputation by its response to emergencies or crises.

Scope

This Policy addresses Crisis Events that have the potential to impact any of the Superior Group and its personnel, properties and systems. Site-Contained Emergency Events are outside of the scope of this Policy and are covered in site specific Emergency Response Plans.

Definitions

"Board" means the board of directors of Superior.

"Business Leaders" means the Chief Operating Officer, North American Propane, Chief Commercial Officer, North American Propane, the President of Certarus, the Senior Vice President of Superior Gas Liquids and such other or additional individual, from time to time, that is the most senior executive of any business segment of the Superior Group.

"CEO" means the President and Chief Executive Officer of Superior.

"CFO" means the Executive Vice President and Chief Financial Officer of Superior.



“CIO” means the Vice President and Chief Information Officer of Superior.

“CLO” means the Senior Vice President and Chief Legal Officer of Superior.

“Crisis Event” means an event that has the potential to have a material impact on the Superior Group. These events may include, but are not limited to, fatalities, loss of IT systems, cyberattacks, loss of facilities or other incidents with potential national media attention or where there is significant potential off-site impact to public safety or the environment.

“HSE Committee” means the Health, Safety and Environment Committee of the Board.

“HSE Crisis Event” means a Crisis Event involving (a) a fatality or serious injury, or ongoing threat thereof, related to the operations of the Superior Group, (b) a natural disaster or public health crisis affecting any personnel or facilities of the Superior Group or (c) significant potential for off-site impact to public safety or to the environment.

“HSE Lead” means the Chief Commercial Officer of North American Propane or such other officer of Superior as may be designated by the CEO from time to time as the HSE Lead.

“IR Lead” means the Vice President, Investor Relations of Superior.

“IS Crisis Event” means a Crisis Event involving a loss of IT systems or a cyberattack.

“Other Crisis Event” means a Crisis Event that is not an HSE Crisis Event or an IS Crisis Event.

“Policy” means this crisis preparedness and communication policy, as may be amended from time to time.

“Site-Contained Emergency Event” means an event which does not have potential for off-site impact to public safety or the environment and can be handled by the personnel at the site although it may require corporate or other support. For certainty, any fatality shall not be considered to be a Site Contained Emergency Event.

“Spokesperson” means the CEO, the CFO and the IR Lead.

“Superior” means Superior Plus Corp.

“Superior Group” means, collectively, Superior, Superior Plus LP, Superior General Partner Inc., and each of their divisions, affiliates and subsidiaries.

Policy

The health and safety of the public and the personnel of the Superior Group, as well as minimizing harm to the environment and to the properties and systems of the Superior Group and minimizing any loss or unauthorized access or use of data and any negative impact to the reputation of the Superior Group, are a priority during a Crisis Event. As such, crisis preparedness at all businesses shall facilitate a timely and appropriate response to Crisis Events and compliance with applicable laws.

In the circumstances, and based on the credible information known by the Superior Group, its communications shall:

- Be timely and clear;
- Show concern and demonstrate compassion;
- Be transparent and forthright;
- Be cooperative with all responders; and
- Demonstrate commitment to address the situation and return to typical operations.

Crisis Preparedness

As a minimum, the CIO must develop, implement and maintain an incident management plan for IS Crisis Events and each business must develop, implement and maintain a crisis management plan for HSE Crisis Events and a regulatory compliant Emergency Response Plan per site, with the following processes in place and tools developed:

1. Pre-determined crisis scenarios, based on hazard and risk assessments, which identify the most likely scenarios for the Superior Group and/or each operational site, as applicable.
2. Pre-written, approved media messages that contain the most basic outline of information that might be needed and can be quickly modified with current and pertinent information during a Crisis Event.
3. 24/7 emergency notification system, to ensure clear and timely notification to the Superior Group's crisis management team.
4. Pre-determined and approved list of internal and external emergency responders and technical advisors, along with their contact information and a means for providing this information in an easily accessible format during a Crisis Event.
5. Roles and responsibilities for responding to a Crisis Event are defined, and training is provided to each person assigned responsibility so that each such person is prepared and competent in their role.
6. Crisis management drills and exercises are conducted with sufficient frequency to validate, and increase familiarity and confidence with, the plan.
7. Critical data is identified and 24/7 access to such data is ensured.

Crisis Communication

All communications and disclosure undertaken in accordance with this Policy shall also be carried out in compliance with Superior's *Communication and Disclosure Policy and Practices*. Superior and all businesses of the Superior Group shall have a communication protocol in place and prior to putting such protocol in place, approval of the CLO and the HSE Lead or CIO, as applicable, shall be obtained. The communication protocol shall include at a minimum the following:

- Any applicable regulatory reporting obligations;
- the flow of information from the first identifier of an actual or potential Crisis Event up the internal communications chain, as well as the flow of instructions back down the chain; and
- Table 1 of this Policy.

The following communication protocol shall be followed in the event of a Crisis Event:

Table 1:

Stakeholder	Relationship Owner/ Communicator	Communication Tool(s)¹	Timeline for Communication
CEO	Business Leaders / CIO Any other direct report to the CEO who becomes aware of a Crisis Event prior to the foregoing executives	Telephone	As soon as practicable, and in any event, within the first 12 hours of the Crisis Event
Chair of the Board (for all Crisis Events). AND: Chair of the HSE Committee (for HSE Crisis Events) Chair of the Audit Committee (for IS Crisis Events)	Business Leaders / CIO Any other direct report to the CEO who becomes aware of a Crisis Event prior to the foregoing executives	Telephone	As soon as practicable, and in any event, within the first 12 hours of the Crisis Event

¹ The communication will only include that information which is available as of the time of such communication and may be limited with respect to scope and other key factual details.

Stakeholder	Relationship Owner/ Communicator	Communication Tool(s) ¹	Timeline for Communication
IR Lead, CFO & CLO HSE Lead	Business Leaders /CIO	Telephone E-mail (for low-severity emergencies)	As soon as practicable, and in any event, within the first 12 hours of the Crisis Event
Board	CLO or senior member of Superior legal team	E-mail or other secure method of communication (i.e. Diligent platform)	As soon as practicable, and in any event, within the first 24 hours of the Crisis Event
Investor Community	IR Lead	Press release Website E-mail Telephone	As determined appropriate by the Relationship Owner/Communicator ²
Media	IR Lead CEO Divisional Media-Trained Spokespeople	Press release Telephone E-mail Website In person	As determined appropriate by the Relationship Owner/Communicator ²
Employees	CEO Business Leaders	E-mail Intranet In person	As determined appropriate by the Relationship Owner/Communicator ²

Communication Requirements

In accordance with the communication protocol in Table 1, written communication to the Board describing a Crisis Event shall be made by the CLO or other senior member of the Superior legal team (“Senior Legal Team”) and such communication shall be marked “privileged and confidential”. Additional written communication relating to Crisis Events, such as emails, messages, reports, etc. should be limited to where necessary and a representative of the Senior Legal Team shall be copied on the communication and the communication shall be marked “privileged and confidential”. Prior to sending any form of internal written communication regarding a Crisis Event, consideration should also be given to whether the proposed communication is best communicated in person, by phone or through a virtual meeting, so that there is no misinterpretation of the facts and important

² The determination of the timeline, tool and content of communication shall be made in consultation with and after receipt of advice from internal legal counsel. Written communications should avoid expressing opinions and conclusions as to cause of the incident.



information is not inadvertently omitted. In that case, a meeting should be scheduled with the appropriate people through the Senior Legal Team. If there are any questions regarding this requirement, guidance should be sought from a member of the Senior Legal Team prior to sending the written communication.

General Communication Guidance

When communicating Crisis Events, the following general guidelines should be followed:

- Be brief and report the facts only;
- Do not make conclusions, provide commentary, opinions or recommendations;
- Specifically note where information has yet to be verified or if there is a source for certain information; and
- Seek legal and technical/expert advice before preparing any reports on the Crisis Event and mark all reports “draft” until they have been reviewed and finalized.

Authorized Spokespersons

In accordance with Superior’s Communication and Disclosure Policy and Procedures, and in order to ensure consistent and accurate timely disclosure, any persons who are not Spokespersons must not respond under any circumstances to inquiries relating to a Crisis Event from the media or the investment community unless specifically asked to do so by a Spokesperson. All such inquiries shall be referred to the IR Lead or in the absence of the IR Lead, to another Spokesperson.

Policy Revisions

The HSE Committee will review and recommend to the Board revisions to this Policy from time to time in order to reflect changes in legal or regulatory obligations or leading practices. Any changes to this Policy must be approved by the Board.