



## 1. INTRODUCTION

### 1.1. Purpose

**AltaGas** expects our **Suppliers** to embrace our commitment to integrity and conduct their business in compliance with all laws, rules and regulations. This Supplier Code of Conduct outlines **AltaGas'** minimum expectations of **Suppliers** when working on our behalf and it is intended to promote lawful and ethical behaviour by all in our business dealings. It is a guide for **Supplier** decisions and actions when working with **AltaGas**. **AltaGas** expects all our **Suppliers** to comply with this **Code**.

### 1.2. Scope

This **Code** applies to all **Suppliers** of **AltaGas** regardless of where such **Suppliers** operate, and is subject to applicable law in all such jurisdictions.

## 2. FRAMEWORK

### 2.1. Ethical Conduct

**AltaGas** expects all **Suppliers** to uphold the values and standards set forth in this Supplier Code of Conduct, to behave ethically, and to comply with all applicable laws, regulations, and policies.

### 2.2. Health and Safety

**AltaGas** operates in a safe, responsible manner respecting the health of our **Employees**, our customers, **Suppliers**, and the communities in which we operate. Our **Suppliers** are expected to provide a safe working environment that supports accident prevention and minimizes exposure to health risks. To help ensure safety and health, **Suppliers** must provide staff with the necessary training and protective equipment. All health and safety-related hazards or potential hazards, incidents or near misses should be reported in accordance with applicable **AltaGas** policies, including the Alcohol and Drug Standard for Contractors. It is the **Supplier's** responsibility to know and understand the health and safety laws and regulations impacting the goods and services they provide and to fully comply with those laws and regulations.

### 2.3. Environmental Protection and Sustainability

**AltaGas** is committed to minimizing its environmental impacts, while safely and reliably delivering energy. **Suppliers** are expected to strive to improve their environmental performance and minimize their environmental footprint. **Suppliers** must follow all applicable laws and regulations and AltaGas' Environment, Health and Safety Policy and other AltaGas policies and guidelines regarding environmental practices.

All environmental-related hazards or potential hazards, incidents or near misses should be reported in accordance with applicable **AltaGas** policies.

Where required, **Suppliers** must obtain and maintain all required environmental permits. **Suppliers** must comply with the reporting requirements of applicable permits and regulations.

## 2.4. Labour and Human Rights

**AltaGas** is committed to maintaining a corporate culture that respects the principles aimed at promoting, protecting and supporting internationally recognized human rights. We expect our **Suppliers** to respect human rights and align with applicable international and domestic standards as well as **AltaGas'** Human Rights Policy.

### 2.4.1. Harassment, Discrimination and Retaliation-Free Workplace

**AltaGas** is committed to maintaining a workplace and culture of respect, dignity and safety, free from discrimination, harassment, bullying, cyber bullying, workplace violence, and retaliation. Everyone, including our **Suppliers**, has a role to play in ensuring that the workplace, whether it is in an office or construction site, is free of such behaviour.

### 2.4.2. Forced Labour, Human Trafficking, Child Labour

**AltaGas** prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, modern forms of slavery and any form of human trafficking.

### 2.4.3. Wages and Benefits

**Suppliers** are expected to comply with all applicable laws and regulations regarding wages, work hours, overtime and benefit laws. Where no wage law exists, workers must be paid at least the minimum local industry standard.

### 2.4.4. Freedom of Association and Collective Bargaining

**AltaGas** requires our **Suppliers** to respect freedom of association (including freely join labour unions, seeking representation and joining workers' councils) and respect collective bargaining, in accordance with local laws.

### 2.4.5. Community Focused

**Suppliers** may be asked to report, on a regular basis, the amount spent with various types of businesses (e.g., small, local, Indigenous, etc.) in connection with the work they perform for the company. This information supports our ongoing efforts to foster inclusive business practices and community participation.

## 2.5. Conflicts of Interest

**Suppliers** may not engage in any activities that would create an actual, perceived, or potential conflict of interest regarding their duties, interests, and obligations to **AltaGas**. Our **Suppliers** and their employees, agents, and subcontractors must promptly disclose any potential conflicts of interest to **AltaGas** management prior to any business transaction taking place and on an ongoing basis throughout the term of the business relationship.

## 2.6. Anti-Bribery and Anti-Corruption

**AltaGas** expects its **Suppliers** to conduct themselves in a manner consistent with **AltaGas'** Anti-Bribery and Anti-Corruption Policy. **Suppliers** must never offer or accept improper payments, inappropriate gifts or anything of value, directly or indirectly, that could influence a business decision or to gain an advantage in business. Any form of bribery, corruption, kickbacks or extortion is prohibited. In addition, **AltaGas** does not permit the making of facilitation payments in order to secure or expedite routine government actions.

**Suppliers** dealing with public officials (federal, provincial, state, municipal or Indigenous) on **AltaGas'** behalf must exercise particular caution not to provide such public officials with anything of value that could be construed as a bribe, or to create a perception of bribery, or otherwise violate applicable law.

## 2.7. Information Security

### 2.7.1. Confidential Information

**Suppliers** should consider all non-public information to be confidential. **Suppliers** must not share confidential information about **AltaGas**. Confidential information includes information that has not been disclosed to the general public about financial data, customer accounts, pending acquisitions or divestitures, trade secrets, contracts, projects, strategic plans, regulated information, personal information, or legal proceedings.

### 2.7.2. Cybersecurity and Privacy

**Suppliers** that access, store, handle and/or process confidential operational, financial or personal information shall have and comply with a data security program to include management, operational, and technical controls governing protection of confidential information. **AltaGas** requires that our **Suppliers** handle personal data with the utmost care; personal data must only be processed in accordance with specific contractual provisions and instructions from **AltaGas** and scope of the work to be performed. **Suppliers** must comply with all applicable state, provincial and federal laws, regulations, and other legal or self-regulatory requirements in any jurisdiction relating to data privacy, data protection, data security, communications secrecy, and data breach notification.

**AltaGas** retains the right to monitor its assets and work environments to determine compliance with applicable federal, state and local laws. **Suppliers** shall not expect privacy during use of **AltaGas'** workspaces, computers, tablets, phones, voicemail or systems that create, access, transmit or store information.

## 2.8. Sanctions and Embargoes

International trade laws prohibit or restrict trade with certain countries that are subject to embargoes or sanctions, as well as with certain individuals and organizations (e.g., entities that have ties to actual or suspected terrorists or drug traffickers). All and any instances of a **Supplier**, any of its affiliates or any of their directors, officers or employees appearing on an individual, organizational, or country sanction or embargo list must be declared to **AltaGas**.

## 2.9. Responsible Procurement

**Suppliers** shall take reasonable steps to ensure that products and services procured are from ethical sources and that subcontractors are aware of and comply with the principles of conduct in this **Code**.

## 3. GUIDANCE

### 3.1. Business Records and Verification

#### 3.1.1. Verification

**AltaGas** may require **Suppliers** to verify, demonstrate or report on compliance with this **Code** and applicable laws and regulations.

**AltaGas** can audit the **Supplier** at any time to ensure compliance with the standards in this Supplier Code of Conduct. Factories and facilities may be inspected as part of this process.

#### 3.1.2. Business Records

We require **Suppliers** to maintain up-to-date financial and operating records and statements with respect to **AltaGas** work. Upon **AltaGas'** request, these records must be made available.

#### 3.1.3. Accurate Disclosure

We expect **Suppliers** to accurately record and disclose information regarding its business activities, without falsification or misrepresentation, to all appropriate parties and as required by law.

### 3.2. Subcontractors

**AltaGas** must be informed of all subcontractors.

**Suppliers** are responsible for educating subcontractors and ensuring subcontractors are compliant with the provisions of this **Code** and the law, including in relation to sanctions, anti-bribery and anti-corruption laws, human rights laws and fair labour standards, data protection laws and adherence to privacy and cybersecurity best practices. In supplying **AltaGas** with materials, goods or services, we require that our **Suppliers** not use third parties that are known to violate the standards set out in this **Code**.

### 3.3. Penalties for Non-compliance

Part of conducting business with **AltaGas** includes compliance with this Supplier Code of Conduct. We have the right to recover financial penalties or terminate business with a **Supplier** who fails to adhere to this **Code**.

### 3.4. Reporting Concerns

We support and encourage **Suppliers** to report suspected instances of potential non-compliance with applicable laws, regulations, this **Code** and other policies, as well as hazards, potential hazards, incidents involving health and safety or the environment. We take every report seriously. We prohibit retaliatory acts against **Suppliers** and individual reporters for the good-faith reporting of such concerns. Reports can be made to **AltaGas'** Legal Department or Compliance team, your **AltaGas** business or supply chain department contact, or anonymously to the Ethics Hotline:

- Calling the toll-free number (available 24 hours per day, seven days per week):

(844) 703-8114

- Submitting a complaint or concern online:

[www.altagas.ethicspoint.com](http://www.altagas.ethicspoint.com)

- Mailing your complaint or concern to the following address:

AltaGas Ltd.  
1300, 707 5 Street SW  
Calgary AB, T2P 1V8  
Attn: Chief Legal Officer

#### 4. DEFINITIONS

**"AltaGas"** or **"we"** or the **"Company"** means AltaGas Ltd. and includes its subsidiaries and affiliates.

**"Code"** means this Supplier Code of Conduct.

**"Supplier"** means an organization that provides materials, goods and/or services to AltaGas, including contractors, vendors, and consultants, and their employees and agents and subcontractors.

**"Employee"** means an employee, officer or director of **AltaGas**.

#### 5. REFERENCES AND RELATED DOCUMENTS

Alcohol and Drug Standard for Contractors

Code of Business Ethics

Human Rights Policy

Environment, Health and Safety Policy

Indigenous Engagement Guidelines

Information Security Policy

Privacy Policy

#### 6. ADMINISTRATION

Effective Date:	July 28, 2023
Date Last Reviewed:	July 28, 2025
Approved By::	Board of Directors
Responsible Administrator ( <b>Owner</b> ):	Supply Chain
Review Cycle:	Triennial
Framework Level	Level 1

Amendments to this **Code**, other than those of an administrative nature, require Board approval.