

Anti-Bribery and Anti-Corruption Policy

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Purpose

AltaGas is committed to conducting its business in an honest and ethical manner and requires all Personnel to do so. AltaGas will conduct its business in compliance with all Applicable Laws governing Bribery and Corruption, including the Canadian Corruption of Foreign Public Officials Act (CFPOA), the Canadian Criminal Code (CC) and the United States Foreign Corrupt Practices Act (FCPA).

The purpose of this **Policy** is to (i) set out the responsibilities of **AltaGas** in conducting business involving a **Government Official**; (ii) to provide guidance to **Personnel** on how to recognize and deal with **bribery** and **corruption** issues; and (iii) to provide guidance to Personnel as to the appropriate offering and acceptance of gifts and entertainment.

Scope

This Policy applies to all Personnel. AltaGas also requires its business partners, agents, vendors, any other third-party service providers, and customers to conduct themselves in a manner consistent with this Policy.

Policy Statement

Personnel must not, directly or indirectly, accept, promise, authorize, offer, give, make, authorize, or request **Anything of Value**, a **Bribe**, gift, entertainment, or any personal benefit or privilege of any kind, for the purpose of, or that could in any way secure, an improper business advantage or improperly influence the judgment, views, decisions or conduct of the recipient(s), a Government Official, or a third party in their business dealings with or on behalf of AltaGas, nor shall Personnel ignore such actions by another person acting on behalf of AltaGas.

All dispositions of AltaGas' cash or assets shall be properly authorized and appropriately evidenced by supporting documentation. All of AltaGas' assets and transactions shall be accurately and fairly reflected, in reasonable detail, in AltaGas' accounting records. No disclosure to AltaGas' internal or independent accountants shall contain any false or misleading statement or omission.

Guidance on Payments or Activities

Accepting and Providing Gifts, Entertainment and Services

Personnel shall not provide or accept gifts, loans, benefits, services or entertainment or anything else of value from individuals or companies seeking to do or currently doing business with AltaGas unless the gift, loan, benefits, service, entertainment or anything else of value complies with **Applicable Laws** and meets all of the following criteria:

- is a goodwill gesture given in good faith, customary, and gives no appearance of impropriety, and is not likely to wrongfully influence the recipient;
- is associated with a valid and bona fide business purpose, including such purposes that are customary for business or cultural protocols, and complies with all Applicable Laws;
- is not intended or expected to improperly influence the recipient or to impose an obligation on either the giver or receiver;
- is not in the form of cash or cash equivalents (such as prepaid credit cards or gift cards) or crypto assets;

- results in no special treatment of AltaGas and/or any of its Personnel;
- is consistent with AltaGas approved normal business practice and customs;
- is given transparently with no attempt to hide any facts surrounding the gift;
- is given or accepted at an appropriate time;
- is proportionate and objectively reasonable and of a type and value that correlates to the business relationship with the other party (which may include relationship-building and information sharing or gathering); and
- is fully and accurately recorded in the books and records of AltaGas including the names of the persons who received the gifts, loans, benefits, services or entertainment and the purpose of the expenditure.

For certainty, a bona fide business purpose, as noted above, would include providing assistance or services in applying for or seeking access to generally available programs including loans and funding grants offered by unrelated and arm's length third parties, where such programs further the business relationship between AltaGas and the applicant party. In addition, the provision of financial payments, equity interests, and other benefits are permissible as part of the provision of accommodation measures to impacts on Indigenous rights recognized and affirmed under the Constitution Act, 1982 (Canada) or voluntary equity participation, partnership, or other business relationship-building arrangements with Indigenous groups undertaken in furtherance of AltaGas's Indigenous engagement objectives and in accordance with applicable AltaGas policies and Applicable Laws. Please refer to applicable AltaGas reference documents and policies on the provision of such accommodation measures and arrangements.

Personnel who believe a gifts, services, or entertainment may not meet these criteria must promptly disclose it to the Compliance Team. Gifts received from Indigenous groups must also be disclosed to the Indigenous Relations team. Personnel must seek guidance before proceeding, and the gifts, services, or entertainment must not be offered or accepted unless a written exception is approved in advance.

In general, you may not give or accept gifts or benefits, including entertainment, to or from current or prospective AltaGas customers, suppliers, agents, or distributors if the purpose of the gift or benefit is to obtain or retain an improper business advantage or to improperly influence a person's judgment, views, decisions or conduct. Similarly, you may not accept or allow a close family member to accept gifts, services, loans or preferential treatment from anyone – customers, suppliers or others – in exchange for past, current or future business with AltaGas. Some AltaGas businesses or operations have **Procedures** that may be more restrictive and/or require additional approvals. You are responsible for complying with the **Applicable Policies**. If you have any questions about the appropriateness of accepting a gift, invitation, raffle or other prize, you should discuss the matter with the Compliance Team prior to your participation or acceptance.

Indirect Payments

A company may be liable for Bribes paid by an agent or other third party to obtain or maintain business on behalf of that company. Agents and other third parties must be carefully selected and monitored to reduce the potential for such indirect liability. For example, justification (preferably, in the form of documentation) should be required before paying unusual or excessive expenses, and AltaGas should refuse to pay a third party if AltaGas has reason to believe that the third party has made an improper payment.

Due Diligence

Particular care should be taken in doing business with a third party if the third party:

- is recommended by a customer or Government Official, rather than selected independently by AltaGas;
- does not have qualifications beyond real or apparent influence over customers or Government Officials;
- refuses to identify its owners, principals, or employees,
- requests commissions, fees or expenses in excess of the going market rate; or
- requests payments be made to a tax haven company or to a country outside of the country where the third party does business.

Due diligence, in coordination with the Compliance Team, should be conducted and documented to the extent warranted by the potential risk before a business relationship is formed or a transaction is completed.

Community Investment, Charitable Contributions and Sponsorships

AltaGas is committed to being an active and supportive member of the community and we strive to excel as responsible corporate citizens by giving back to the communities where we live, work and do business. Our approach to community investment is to support funding for non-profit organizations, projects and initiatives that help build and enhance communities.

Any community investment, charitable contributions, sponsorships or **Donations in Kind** made or offered on behalf of AltaGas must: (i) be made subject to the receipt of a request or proposal that clearly sets forth how any funding to be received from AltaGas will be used; (ii) not be related to, dependent on, or made in order to win, or improperly influence, a business deal or an official act or decision; (iii) be given to a documented and verifiable charity or organization; (iv) be given directly to the relevant charity or organization (v) be made in accordance with **Applicable Policies**; and (vi) only be given with the prior written authorization.

Advance approval must be obtained from the Chief Legal Officer prior to making any donation for or on behalf of AltaGas to a charitable or community development organization in which a Government Official or close family member of a Government Official has a prominent role, where a donation is requested by a Government Official, or where the organization is known or believed to be closely associated with a Government Official or close family member of a Government Official.

All community investments, sponsorships and charitable contributions must be accurately and completely documented regardless of the amount of such contribution and are subject to an annual third-party audit. Except as authorized under Applicable Policies, AltaGas will not reimburse any personal contributions. Unless prior written approval is obtained from the Senior Vice President and Chief Safety, Stakeholder & Sustainability Officer, Personnel are prohibited from making any charitable contributions on behalf of or in the name of AltaGas.

Political Contributions

AltaGas does not contribute to political parties or organizations, or to any individual who holds or is a candidate for public office, except when permitted by Applicable Law and in accordance with AltaGas policies and Procedures. All Canadian corporate political contributions must be pre-approved by the Senior Vice President and Chief Safety, Stakeholder & Sustainability Officer and all U.S. political contributions must be pre-approved by the President, Utilities of AltaGas Services (U.S.) Inc. in accordance with AltaGas policies and Procedures, other than contributions to political action committees that are appropriately established under **Applicable Law**. Notwithstanding the foregoing, all U.S. political contributions must be approved via the applicable AltaGas U.S. corporate entity political contribution approval process. Personnel acting on behalf or in the name of AltaGas must never endorse or appear to endorse political parties or organizations, or individuals who hold or are candidates for public office, engage in **Lobbying** activities, nor utilize AltaGas assets for such purpose or make political contributions on AltaGas' behalf.

Lobbying

AltaGas ensures that any Lobbying undertaken by or for it is carried out with honesty and integrity and in compliance with all Applicable Laws, including registration in each jurisdiction where required in accordance with Applicable Laws. Lobbying activity must be reported in accordance with Applicable Laws and Applicable Policies and is subject to prior written approval according to AltaGas policies and Procedures. Any Lobbying carried out by or on behalf of AltaGas will be conducted only by an **Approved Lobbyist** unless specifically authorized by the CEO or the CEO's designate.

Dealing with Government Officials

Subject to the criteria for acceptance or provision of gifts, loans, benefits, services or entertainment or anything else of value, as set out above in section *Accepting and Providing Gifts, Entertainment and Services*, Personnel are prohibited from offering, promising, or authorizing the transfer of Anything of Value, directly or indirectly, to any Government Official to get or keep business or to otherwise secure any improper advantage for AltaGas. Such restriction is also applicable to family members or household members of a Government Official. Any questions with regard to dealings with Government Officials or compliance with Applicable Policies with regard to Government Officials should be discussed with the Compliance Team.

Personnel are prohibited from offering, promising, or authorizing the transfer of **Anything of Value**, giving a loan, reward, advantage or benefit, directly or indirectly, to any Government Official to improperly seek to secure or keep business, or to otherwise secure any improper advantage, for AltaGas. In addition, offering, promising or providing Anything of Value to a family member or household member of a Government Official can constitute Bribery of the official and should not be undertaken. "Anything of Value" will be broadly interpreted by enforcement officials. Even small payments or non-monetary gifts or favours can be considered Bribery.

Personnel are expected to be alert to potential Bribery related concerns in all aspects of AltaGas' interaction with Government Officials. This could include, among other situations: (i) granting any permit, license, approval, or concession needed to operate our business; (ii) acting on tax, customs and similar matters; and (iii) dealings with judiciary or regulators in connection with court, administrative, or regulatory proceedings. This also includes inducing a Government Official to use (or not to use) their position to improperly influence acts, outcomes, or decisions, as well as other attempts to gain assistance or cooperation from a Government Official.

Recognizing who is a Government Official can be challenging. Many state-affiliated enterprises appear to be private rather than public in nature. Personnel are responsible for conducting adequate investigation of entities and persons with whom AltaGas is proposing to do business to determine whether they are Government Officials.

Personnel must consult the Compliance Team if they have questions regarding dealings with Government Officials, including whether an individual qualifies as a Government Official or the application of relevant policies. Any Lobbying conducted by or on behalf of AltaGas must be performed by an Approved Lobbyist, unless expressly authorized by the CEO or the CEO's designate.

Gifts and Meals for Government Officials

In general, you may not give or accept gifts or benefits, including entertainment, to or from current or prospective AltaGas customers, suppliers or distributors if the purpose of the gift or benefit is to obtain or retain an improper business advantage or to improperly influence a person's judgment, views, decisions or conduct. Similarly, you may not accept or allow a close family member to accept gifts, services, loans or preferential treatment from anyone – customers, suppliers or others – in exchange for past, current or future business with AltaGas. In considering this requirement, please refer back to the criteria for permissive acceptance or provision of gifts, loans, benefits, services or entertainment or anything else of value, set out above in section *Accepting and Providing Gifts, Entertainment and Services*.

Some AltaGas businesses or operations have Procedures which may be more restrictive and/or require additional approvals. You are responsible for complying with the Applicable Policies. If you have any questions about the appropriateness of accepting a gift, invitation, raffle or other prize, you should discuss the matter with the **Corporate Team** prior to participation or acceptance.

Personnel must be prudent when offering or providing, directly or indirectly, gifts, meals, entertainment, or other business hospitality to Government Officials. Reasonable gifts and promotional items, meals, and entertainment may be provided to Government Officials where: (i) there is a legitimate business purpose; (ii) the item of value is not being provided in exchange for any action or inaction of the Government Official; and (iii) the gift complies with Applicable Law governing limitations and disclosures. The value of any such gift should be determined from the recipient's point of view. If you have any questions about whether a proposed gift, meal or entertainment is appropriate, consult the Compliance Team.

Travel and Expenses for Government Officials

If appropriate in the circumstances, AltaGas may pay reasonable business-related expenses for Government Officials if:

- there is a legitimate and valid business purpose, such as a Government Official's visit to an AltaGas facility to test products, promote products, or observe a demonstration or explanation of the specific capabilities of AltaGas; and
- the expenses incurred by the Government Official are reasonable and appropriate in amounts and directly related to the business purpose or the execution or performance of a contract between AltaGas and the entity or state for which the Government Official is performing duties or functions.

AltaGas shall not pay or reimburse non-business travel expenses such as recreation or entertainment for a Government Official, Government Official's spouse or other family member. Per diems or cash allowances must not be provided to Government Officials.

Hiring Former Government Officials and/or Family Members of Current Government Officials

The hiring of and contracting with former Government Officials is permitted but subject to the conditions listed below as well as all Applicable Law. This Section also applies equally to the hiring of and contracting with family members of current former Government Officials.

The hiring of, or contracting with, a former Government Official or a family member of a current Government Official cannot:

- create an improper business advantage;
- create an actual or potential conflict of interest;
- be done without the allowance for a sufficient cooling off period after the end of the candidate's employment as a Government Official if the candidate's role in any way relates to his or her prior work as a Government Official;
- utilize or communicate any confidential information of the candidate's previous employer(s);
- conflict with or breach any undertakings, agreements or covenants to maintain the confidential information of the candidate's previous employer(s) and/or to comply with the terms of any rules, regulations, policies and codes of conduct imposed by the candidate's previous employer(s); and
- be or have been an improper benefit to the former Government Official or be or have been a Bribe to improperly influence the former Government Official's judgment, conduct, act, or decision (or to the current Government Official if with respect to a family member of such Government Official), including any position or role created for the purpose of compensating the candidate or that does not require the individual's presence or the performance of only de minimus work.

The former Government Official (or family member of a current Government Official, as applicable) must:

- identify and disclose all existing and potential conflicts of interest that the candidate may have with respect to AltaGas; meet or exceed all the AltaGas requirements for the potential role;
- abstain from knowingly communicating with or appearing before any agency of the government, with the intent to influence, for such period of time as required by Applicable Law during any AltaGas employment of the candidate;
- provide written confirmation of release by the government from any post-government employment restrictions as applicable to AltaGas as may be required by Applicable Law (including, but not limited to "revolving door" laws);

Payments In *Extremis* or Dire Straits

This Policy does not prohibit payments to avoid a serious and imminent threat of harm to you, to others and/or to AltaGas. Personnel should use best efforts to notify the SVP & Chief Safety, Stakeholder & Sustainability Officer and the Compliance Team of the threat and the demand for a payment in advance of making any such payment. If that is not possible, Personnel should report the incident to the SVP & Chief Safety, Stakeholder & Sustainability Officer and Compliance Team as soon as possible.

Facilitation Payments

AltaGas does not make any **Facilitation Payments** of any kind. If you suspect a payment is a Facilitation Payment or if you encounter a situation that you believe may require a Facilitation Payment, contact the Senior Vice President and Chief Safety, Stakeholder & Sustainability Officer, or Compliance Team immediately.

Books, Records and Accounts

AltaGas keeps and maintains accurate books and records of all payments to and from Government Officials, current or prospective AltaGas customers, suppliers, agents or distributors, or other third parties.

All payments made for or by any Personnel representing AltaGas must be fully, accurately and properly recorded and reported. Recording such payments in any way that would conceal their true nature or which is contrary to applicable accounting or auditing standards is not permitted.

Some examples of prohibited activities include, but are not limited to:

- establishing or maintaining accounts which that do not appear in any books and records that AltaGas is required to keep in accordance with applicable accounting and auditing standards;
- undertaking transactions that are not recorded in such books and records or that are inadequately identified in them;
- recording non-existent expenditures in the books and records of AltaGas;
- entering liabilities with incorrect identification of their object in the books and records of AltaGas;
- knowingly using false documents; or
- intentionally destroying such books and records earlier than permitted by Applicable Law.

Compliance and Reporting

Compliance

Anyone who violates this Policy can subject both themselves and AltaGas to severe criminal and civil penalties. In a case where money or items of value are improperly provided or offered to a Government Official, or the failure to properly register Lobbying activities, the consequences can include debarment and liability under Applicable Law, potentially leading to substantial fines and even imprisonment. Violations of this Policy can negatively impact AltaGas' relationship with Government Officials, which could impede the company's ability to obtain licenses and permits and to conduct its future business.

Any violation of this Policy will be taken seriously and may lead to the imposition of disciplinary measures. For employees, failure to observe the standards set forth in this Policy may result in disciplinary action, up to and including termination of employment for cause and may also impact your performance assessment and compensation, including incentive compensation. For consultants, contractors, other third parties, and contingency workers, failure to observe the standards set forth in this Policy may be considered a material breach of contract resulting in termination of the contract.

Identification of "Red Flags"

Personnel should not ignore indicators of bribery and corruption. Personnel who see "red flags" are expected to ask questions, refer the matter to the Compliance Team for review and guidance and/or make a report through the **Ethics Hotline**. For a non-exhaustive list of examples of "red flags", please refer to **Appendix A**.

Reporting

Personnel who know of or suspect a violation of this Policy must report it without delay, either directly to the Senior Vice President and Chief Safety, Stakeholder & Sustainability Officer, Compliance Team or through the Ethics Hotline. No Personnel will suffer penalty or other adverse consequences for refusing to engage in paying or receiving a Bribe or other conduct prohibited by this Policy or for making a good faith report of possible wrongdoing, even if AltaGas loses business or otherwise suffers a disadvantage.

The Chief Legal Officer, Senior Vice President and Chief Safety, Stakeholder & Sustainability Officer, President of Utilities for AltaGas Services (U.S.) Inc., or the Compliance Team may, from time to time, delegate their reporting responsibilities to another individual in accordance with a written Procedure.

Acquiring Other Entities or Participating in Joint Ventures

Before acquiring another entity, investing in another entity, or participating in a joint venture, consortium or similar business arrangement, AltaGas will conduct appropriate due diligence, as determined by the legal department, with respect to the other participants, including regarding compliance with **CFPOA**, **CC**, **FCPA**, and other Applicable Laws and the principles of this Policy.

Definitions

In this Policy, the following terms are used and described below:

"AltaGas" means AltaGas Ltd. and includes its subsidiaries and affiliates.

"Anything of Value" includes, without limitation, cash, cash equivalents, crypto assets and financial benefits such as stocks, discounts, or loans, as well as non-monetary and commercial benefits such as gifts, travel, entertainment, political or charitable sponsorships or contributions, kickbacks, offers of future employment, internships, personal favours, or hiring a family member or friend of a government official, customer, or supplier. It also includes services provided for free or at a discount, improper preferential treatment, access to confidential information, or benefits given to a third party at the request of a Government Official, a customer, or a supplier. See section *Accepting and Providing Gifts, Entertainment and Services* on criteria for appropriate provision of acquisition of Anything of Value.

"Applicable Law" means, as applicable in a specified jurisdiction, all legislation, statutes, rules, regulations and orders of governmental bodies or regulatory agencies, including any applicable regulatory guidance, policies or approvals.

"Applicable Policies" means the **COBE**, this Policy and the Policy Supplements and Procedures applicable to your workplace.

"Approved Lobbyist" for the purpose of this Policy, means an appointed consultant, employee, officer or director of AltaGas who has been approved as an "Approved Lobbyist":

- i) For AltaGas Ltd. and its Canadian subsidiaries, by the Chief Executive Officer of AltaGas Ltd. as recommended by the Senior Vice President and Chief Safety, Stakeholder & Sustainability Officer in accordance with Applicable Policies and Procedures.

For AltaGas Services (U.S.) Inc. and its subsidiaries and U.S. affiliates, by the President, Utilities as recommended in accordance with Applicable Policies and Procedures, and includes **Registered Lobbyists**.

"Bribe" and **"Bribery"** means to accept, promise, authorize, offer, give, receive, make or request, directly or indirectly, a gift, loan, travel, reward, advantage, benefit of any kind, or Anything of Value in order to obtain, retain or reward an improper business advantage, in consideration for cooperation, assistance or to improperly influence a person's judgment, views, decisions, acts or omissions, or other conduct. It can also include paying or receiving a secret or other commission, cash or cash equivalents, kickbacks, crypto assets, or other consideration, or offering or providing an office, place or employment for an improper purpose (including payments made by third parties on our behalf or purporting to be on our behalf).

"CC" means the Canadian Criminal Code.

"CFPOA" means the Canadian Corruption of Foreign Public Officials Act.

"COBE" means the AltaGas Code of Business Ethics.

"Compliance Team" means the group or function responsible for overseeing, supporting, and promoting compliance with Applicable Laws, regulations, regulatory requirements, and AltaGas policies.

"Corruption" means the misuse of public power for private profit or the misuse of entrusted power for private gain.

"Donations in Kind" means the provision of goods and services for little or no consideration.

"Ethics Hotline" means the third-party service managed hotline accessible through one of the following means:

Ethics Hotline: 1-844-703-8114

Ethics website: altagas.ethicspoint.com

Mail: AltaGas Ltd.
1300, 707 5th Street SW
Calgary, AB T2P 1V8

Attn: Chair of the Audit Committee c/o: Corporate Secretary

"Facilitation Payment" means a payment made directly or indirectly to a Government Official designed to secure or accelerate a routine government action to which the applicant is entitled, such as processing a visa, issuing a permit, scheduling an inspection, securing mail pick-up or delivery or connecting utilities. This is sometimes referred to as a "grease payment".

"FCPA" means the United States Foreign Corrupt Practices Act.

"Government Official" means any appointed, elected or honorary civil servant, public office holder or official or any employee of a government, of a government-owned or controlled company, or of a public or international organization, a government agency, tribunal, board, commission or Crown corporation or a subsidiary of a Crown corporation. This definition includes, but is not limited to:

- individuals who hold legislative, administrative, or judicial positions;
 - individuals who perform public duties or functions including those individuals employed by a board, agency, commission, tribunal, corporation, or other body or authority that is established to perform a duty or function on behalf of a government or a foreign state and is performing such duty or function; References to a foreign state include a country, any political subdivision of that country, the government of that country, the government of any branch of that country or a political subdivision or any agency thereof;
 - officials or agents of public international organizations that are formed by two or more states or governments, or by two or more such public international organizations;
 - officials or employees of government departments or agencies at any level (such as legislators, environmental regulators, permitting and licensing Personnel, tax authorities, police officials police commissioners, peace officers, officers of a juvenile court, judges, or anyone employed in the administration of criminal law), whether federal, provincial, state, territorial, regional, municipal or otherwise, including U.S., Canadian, and foreign officials or employees;
 - employees of state-owned or controlled enterprises (e.g. state-owned contractors, vendors, or suppliers, or customers) and employees of enterprises or corporations owned or controlled by a Canadian province or territory;
 - officials or employees of Tribal, Indigenous or First Nations governments or groups and employees of enterprises owned by tribal, indigenous or First Nations governments;
 - officials of political parties and elected members of municipal, provincial, territorial, state, county, city, or federal governments; and
 - candidates for public office and persons who are appointed or elected to discharge a public duty.
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"Lobbying" is defined in Applicable Laws, regulations, policies and Procedures and employees must know and follow these requirements at the relevant level of government. For the purpose of this Policy Lobbying generally means communicating (both orally and/or in writing) with a Government Official for:

- developing, introduction, amending, passing, defeating of any proposal, bill, regulation or resolution;
- development or amendment of any Policy or program;
- arranging a meeting between a Government Official and any other person; or
- awarding of any contract, grant, contribution or other financial benefit.

Personnel must consult Applicable Law in their jurisdiction as to any differences in the applicable definition of Lobbying.

"Personnel" means, in relation to AltaGas, all directors, officers, employees, contingency workers, contractors, consultants, employees of contractors or consultants and students representing AltaGas or engaged in AltaGas' business or social activities.

"Policy" means this Anti-Bribery and Anti-Corruption Policy.

"Policy Supplement" means a schedule or annex to this Policy which provides additional standards applicable in a local jurisdiction or specific business segment.

"Procedure" means a Procedure or guideline relating to this Policy or a Policy Supplement and that provides a Procedure to be followed in implementing the standards set out in the COBE, this Policy or a Policy Supplement.

"Registered Lobbyist" for the purpose of this Policy, means an Approved Lobbyist who is formally registered with any applicable Lobbying registrars and who must register and list all Lobbying activity conducted on behalf of AltaGas through established reporting processes.

References and Related Documents

- Indigenous Engagement Guidelines
- Community Investment Guidelines

Administration

Effective Date:	August 1, 2019
Date Last Reviewed:	July 28, 2026
Approved By:	Board of Directors
Policy Administrator (Owner):	Chief Legal Officer
Responsible Business Unit:	Corporate Compliance
Review Cycle:	Annual
Framework Level:	Level 1

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

Appendix A

The following is a list of potential “red flags” that may indicate the possible existence of Bribery or other corrupt practices, and should be kept in mind by all Personnel. This list is not exhaustive and Personnel should report any activity or fact that raises a concern regarding a violation of this Policy:

- use of an agent, consultant, or third party with a poor reputation, with little experience in the subject matter of the contract, recommended by a customer, supplier, or Government Official, or with links to Government Officials;
- unusually large commission payments or commission payments where the agent or consultant does not appear to have provided significant services or in excess of the going market rate;
- the use of cash payments, cash equivalents or crypto assets or requests for the foregoing;
- payments without adequate paper trails or compliance with internal controls;
- unusual bonus payments or unusually large discounts without support or in excess of the going market rate;
- requests unusual compensation or payment methods;
- requests for payments to be made to third parties or to off-shore accounts;
- failure to adhere to standard contracting practices;
- does business in countries that pose a high Corruption risk or in high Corruption risk industries;
- unexplained preferences for certain contractors;
- evasiveness on how the party conducts its business;
- invoices in excess of contract amounts, or undocumented or inadequately documented change orders;
- requests that AltaGas provide employment or some other advantage to a friend or relative;
- requests by Government Officials to make contributions to charitable organizations;
- refusal by the other party to document its promise that it will comply with the CFPOA, FCPA, or other applicable anti-Bribery and anti-Corruption laws;
- refusal by the other party to comply with the Supplier Code of Conduct or failure to maintain a comparable code of conduct;
- the counterparty is known to be owned in whole or in part, directly or indirectly, by a Government Official or his or her family member or household member or otherwise has close ties to a Government Official;
- the counterparty contributes significant amounts to political parties or candidates;
- the counterparty does not have qualifications beyond real or apparent influence over customers, suppliers, or Government Officials;
- the counterparty insists that his or her identity not be disclosed to a government agency or enterprise;
- the counterparty refuses to identify its owners, partners, or principals;
- there is a request for extravagant dinners or entertainment;
- there is sponsored travel for Government Officials and/or family members where there is no clear and legitimate business purpose;
- kickback payments to Personnel or Government Officials;
- missing supporting documentation;
- Government Officials who insist on dealing with specific Personnel or a specific intermediary or supplier;
- requests to deal on a “handshake” and refusing to paper a transaction;
- Personnel who spend excessive time with Government Officials;
- duplicative invoices for one transaction;
- requests for side agreements;
- missing cash, inventory, or other supplies;
- suspicious terminations of Personnel who may have been potential whistleblowers;
- minimal due diligence on a supplier; or
- contracts that only vaguely describe the goods and/or services.