

## SUPPLIER CODE OF CONDUCT

## INTRODUCTION

Boardwalk Pipelines, LP ("Boardwalk") is committed to operating in a safe, reliable, environmentally sound, and economically and socially responsible manner. We expect our suppliers to follow Boardwalk's fundamental values, policies and procedures in their business dealings with us. Suppliers are expected to work with us in enforcing the Supplier Code of Conduct ("Code") and to communicate our requirements to their employees, contractors, and vendors.

One of Boardwalk's Core Values is integrity. Our suppliers are expected to engage with us, our employees, and neighbors with integrity and in a manner consistent with these Core Values. Suppliers are also expected to comply with all applicable laws in connection with the services and/or products they provide us. Suppliers that fail to comply with the Code, our Core Values, or the applicable laws risk having their contractual relationship with Boardwalk terminated.

# **HEALTH, SAFETY AND ENVIRONMENT**

Boardwalk's Core Values include a commitment to operating our assets safely to protect our people, neighbors, the environment, and our property and that of others. Our goal is to achieve zero safety incidents and to foster a culture in which safety is everyone's responsibility. We expect our suppliers to safely conduct their business and adhere to all applicable local, state, and federal rules, regulations, and laws. We expect that our suppliers will honor our commitment to safety and assist us in providing a safe workplace. While working at any of our facilities, suppliers are required to report immediately any safety issues to Boardwalk's facility/project supervisor or to call Boardwalk's Ethics Hotline.

Boardwalk is committed to environmental stewardship and is working towards reducing the environmental impact of our projects and facilities. Suppliers are expected to comply with Boardwalk's environmental standards as a condition of doing business with or for us.

## **EMPLOYMENT PRACTICES**

Every individual deserves to be treated honestly and with dignity. Boardwalk does not tolerate any form of harassment, discrimination, or inappropriate actions by its employees or contractors. Suppliers must conduct all their operations or interactions with our employees in a non-discriminatory manner and in full compliance with all applicable laws (including but not limited to health and safety, minimum living wages, maximum working hours, freedom of association, child labor, acceptable living conditions and forced labor). Suppliers are also expected to ensure that any workers they provide from third-party agencies to our facilities comply with this Code and all applicable laws.

#### **BUSINESS ETHICS**

Suppliers are expected to conduct business in a transparent, ethical, and responsible manner and to provide goods and services in accordance with our contractual specifications. We also expect suppliers to work with us to timely and fairly resolve disputes.

Suppliers are required to produce timely, accurate, and complete business records of each transaction with Boardwalk. This includes preparing accurate invoices and other financial records consistent with our agreements and appropriate accounting standards. Suppliers also are expected to create, maintain, and dispose of business records consistent with our agreements and all applicable laws. Boardwalk reserves the right to audit suppliers' records consistent with the terms of our agreements.

# **Conflicts of Interest**

Suppliers are expected to promptly report any actual or perceived conflict of interest between its employees and Boardwalk. A conflict of interest arises when a supplier's interest or activities influence or appear to influence their ability to provide goods or services to Boardwalk. A conflict of interest may arise in situations such as suppliers with family members working for us, or suppliers with a significant financial interest in an industry competitor or peer. Such circumstances may create actual or perceived conflicts of interest<sup>1</sup>.

#### Gifts and Entertainment

Business gifts and entertainment outings may be acceptable under certain circumstances to develop business relationships. Boardwalk does not condone offering or receiving of gifts and/or entertainment designed to influence the recipient's judgment. These items are never required to conduct business with us and should never be requested by one of our employees. Gifts or entertainment outings should be modest in value. Any gift of

<sup>&</sup>lt;sup>1</sup> Conflicts of Interest are also addressed in Boardwalk's Code of Business Conduct and Ethics.

cash or cash equivalent is prohibited, as is any entertainment outing that conflicts with Boardwalk's Code of Business Conduct and Ethics.

## **DIVERSITY**

We are committed to non-discrimination against businesses based on ownership in the selection of those suppliers who provide us with needed services.

## **REPORTING CONCERNS**

This Code does not attempt to address every issue that may arise between us and our suppliers. If a supplier has concerns about potential or actual violations of this Code or any law or regulation, they should immediately contact their Boardwalk counterpart. If the supplier's concern is not resolved or the supplier is uncomfortable raising the issue with their Boardwalk counterpart, the supplier can contact Boardwalk's Legal Department at 713.479.8059 or Boardwalk's Ethics Hotline (866-552-3557). Our Ethics Hotline is a confidential line that is operated by an independent service, and concerns may be reported anonymously. Our Hotline is available 24 hours a day to everyone, including our employees, contractors, or the general public.

Owner/Approver:

General Counsel

Initials

Reviewed by:

Chief Executive Officer

Chief Financial Officer

Effective Date:

September 26, 2022