



# PLAINS

## **Code of Business Conduct For Contractors and Suppliers**

*Plains is committed to ethical business behavior and conducting our business in compliance with all applicable laws and regulations, and we expect our suppliers and contractors to uphold the same commitment*

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## INTRODUCTION; OUR COMMITMENT TO CONDUCTING BUSINESS THE RIGHT WAY

Plains All American and its subsidiaries (collectively “Company” or “we”) are committed to ethical business behavior and conducting our business in compliance with all applicable laws and regulations. Our Code of Business Conduct sets forth the following Core Values that govern how we conduct business and engage in business relationships:



### **Safety and Environmental Stewardship**

We conduct our operations and business in a manner that is safe for employees, contractors and the environment.



### **Accountability**

In conducting our business, we are accountable to each other, our investors, our customers and our other stakeholders, including the communities where we live and work.



### **Ethics and Integrity**

In our dealings within and outside of the company, we do the right thing, obey the law and act with the highest levels of honesty, ethics and integrity.



### **Respect and Fairness**

We treat each other and our stakeholders fairly and with respect.

Maintaining and nurturing a culture that is consistent with these core values is key to our long-term success and sustainability as a company. We strive to choose suppliers and business partners objectively and fairly, and to act with honesty in our business dealings with them, avoiding conflicts of interest and other improper or unethical behavior. In turn, we expect our third-party suppliers, contractors and their employees to maintain similar ethical standards and to work together with us in a way that allows us to uphold the standards set forth in our Code of Business Conduct and meet our commitment to conduct business the right way.

In furtherance of this commitment, the Company expects all contractors, suppliers and their employees that provide products or services to the Company (collectively, “Contractors and Suppliers”) to comply with the expectations and principles of conduct outlined in this Code of Business Conduct for Contractors and Suppliers (CBCCS).

This CBCCS cannot cover every possible issue that may arise. Please contact the Company employee you work with if you have any questions about this CBCCS or the associated expectations.

## ***GENERAL EXPECTATIONS***

With respect to business conducted with or on behalf of the Company, we expect our Contractors and Suppliers to comply with all applicable laws and regulations, as well as with the principles of conduct set forth below.

### **Environmental Stewardship**

Contractors and Suppliers should strive to be responsible stewards of the natural resources they use to operate, in addition to minimizing the impact of their activities on the environment and neighboring communities. Contractors and Suppliers are expected to comply with all applicable environmental laws and regulations, to provide appropriate training and education to their employees, and to utilize and maintain any necessary equipment, systems, processes and practices that support safe and environmentally responsible operations. Contractors and Suppliers are also expected to consider the private property rights of landowners and to treat their property with care and respect.

### **Health and Safety**

Contractors and Suppliers are expected to conduct their operations in a manner that does not jeopardize the health or safety of their or our employees or members of the communities in which they operate. Contractors and Suppliers are expected to provide safe and secure workplaces that meet all applicable health and safety laws, regulations and standards, and to ensure that their employees and representatives work in conformance with applicable health and safety requirements and procedures.

### **Substance Abuse**

Contractors and Suppliers are expected to perform their jobs free from the influence of substances that could impair their judgment or compromise the safety of their or our employees and those affected by the Company's operations. Contractors and Suppliers are prohibited from soliciting, distributing or selling illegal drugs to Company employees or bringing illegal drugs or drug-related paraphernalia into the Company's workplace.

### **Discrimination and Harassment; Human Rights**

Contractors and Suppliers are expected to observe all applicable labor and employment laws and regulations, and to prohibit unlawful discrimination, harassment or retaliation against their employees. Contractors and Suppliers are expected to provide a professional work environment in which people are treated with dignity and respect. Contractors and Suppliers should oppose harassment, abuse, discrimination, forced labor and child labor.

### **Conflicts of Interest**

Contractors and Suppliers are expected to avoid and to report to the Company any situation or circumstance that may appear to create a conflict of interest. Contractors and Suppliers should not use or attempt to use their relationship with the Company to obtain any improper benefit for the Contractor or Supplier or for their employees, family members or any other person. Contractors and

Suppliers are expected to avoid taking actions or having interests that may make it difficult to provide services to the Company objectively.

### **Avoiding Improper Business Conduct**

Contractors and Suppliers should not offer, give or provide to, or accept from, any Company employee any gifts in excess of nominal value (including gifts of cash, gift cards or securities), or any entertainment or travel that is not appropriate, reasonable or customary. Contractors and Suppliers are expected to exercise caution and use good judgment when offering or accepting business courtesies (gifts of nominal value) to or from Company employees to ensure that giving or receiving such gifts does not create an appearance of any impropriety.

Contractors and Suppliers are expected to prohibit bribes, kickbacks or other illegal efforts to obtain an improper business advantage on behalf of the Company. Contractors and Suppliers should never directly or indirectly promise, offer, deliver or authorize the giving of money or other things of value to or for the benefit of any governmental official or governmental employee, to inappropriately influence, or obtain or retain business for the Company with, a governmental entity.

### **Protecting Confidential Information; Proper Use of Company Assets**

Contractors and Suppliers are expected to protect and maintain the confidentiality of any Company information to which they have access, including intellectual property, trade secrets, customer information, business plans, salary or employee personal information and financial information. Contractors and Suppliers are also expected to safeguard any property or assets belonging to the Company while under their control. Except as specifically authorized by the Company, Company property and equipment may only be used for Company business. Any suspected incident of fraud, cybersecurity breach, or theft involving Company data or property should be reported to the Company immediately.

### **Books and Records**

Contractors and Suppliers are expected to maintain books and records that accurately, honestly and completely reflect all transactions involving the Company (including contracts, invoices, expense reports and other business records) and to provide that information to the Company, its auditors, advisors or any regulatory or governmental authorities, when required or requested.

## **COMPLIANCE AND REPORTING**

The expectations outlined in this CBCCS are intended to supplement the terms and conditions of any contract between the Company and any Contractor or Supplier. If any conflict exists between this CBCCS and the terms and conditions of any contract between the Company and any Contractor or Supplier, the terms and conditions of the contract shall prevail.

Suspected violations of this CBCCS may be reported to the Company's confidential third-party hotline service (877-778-5463 or [reportit.net](http://reportit.net) – use "PAA" for login and password). This service is available 24 hours a day, seven days a week.