

POLICY STATEMENT:

Equitrans, including all its affiliated entities is committed to conducting business throughout its supply chain in an ethical, legal, and socially responsible manner. Equitrans expects its suppliers to share this commitment and, therefore, has established this Supplier Code of Conduct.

SCOPE:

This Policy covers all employees of Equitrans, our direct suppliers, and any indirect third-party contractors regarding any contractual relationships throughout our supply chain.

POLICY DETAILS:

Introduction

At Equitrans, we are committed to conducting our business with integrity. As one of our Core Values, integrity means doing the right thing and we believe it is essential to our success. As individuals, we will act ethically and demonstrate accountability for our actions, behaviors, and decisions – and others can rely on us to be honest, fair, and forthright. As a Company, integrity means that we honor our commitments and are a reliable business partner and trusted neighbor. Integrity protects our reputation and enables us to thrive, even in today's complex and competitive business environment. Similarly, we expect each of our suppliers to conduct its business with integrity and adhere to our Core Values, which are the principles that guide our behaviors and decisions, as well as our policies and procedures.

This Supplier Code of Conduct (Supplier Code) outlines Equitrans Midstream Corporation and its subsidiaries' and affiliates' (collectively, Equitrans) requirements regarding the ethical standards and business conduct of its suppliers, contractors, and third-party providers (collectively, Suppliers). All Equitrans employees, directors, and suppliers must comply with the Equitrans Code of Business Conduct and Ethics (Equitrans Code). The Equitrans Code is the underlying document enforcing Supplier conduct and these principles are incorporated and applied in this document. In any instances where there are conflicts between the Equitrans Code and the Supplier Code, the Equitrans Code shall apply.

In all their activities, our Suppliers must conduct business in full compliance with the standards set out in the Equitrans Code, this Supplier Code, as well as applicable laws, rules, and regulations. We also require our Suppliers to be familiar with the provisions of each of the following Equitrans policies (collectively, Policies), which are available on our website, the provisions of which are incorporated herein by reference thereto:

- Human Rights Policy (<u>https://www.equitransmidstream.com/human-rights-policy/</u>)
- Technology Requirements for Suppliers and Contractors (<u>https://www.equitransmidstream.com/cyber-safety/</u>)

We will only contract with Suppliers that are committed to integrity and the principles in this Supplier Code through their direct actions and the management of their own service providers throughout the supply chain.

Good Judgment and Compliance with Legal Requirements

This Supplier Code serves as a guide to our Suppliers of the high standards they must meet in their day-to-day activities. However, it is not intended to cover all situations that Suppliers may encounter; these guidelines help reinforce the expectation that Suppliers use good judgment and integrity in their business dealings with Equitrans and our external stakeholders. Further, Equitrans requires each Supplier to comply with all applicable legal requirements, including contractual requirements, laws, regulations, and disclosure obligations, applicable to the operation of its business and the work provided in its relationship with Equitrans.

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Safety

Safety is Equitrans' number one priority. The safety and well-being of our employees, contractors, and community members take precedence, and the execution of our business strategy is not successful unless Zero Is Possible. We staunchly believe that workplace injuries are preventable. Everyone at Equitrans has a collective responsibility to exhibit safety leadership to realize success and, most importantly, create a workplace where Zero Is Possible. Our priority is to foster a proactive culture in which safety is everyone's responsibility, continuous improvement is required, hazards are controlled, and our commitment to caring extends beyond the workday.

We require our Suppliers to operate in alignment with our commitment to safety and to do their part to help us achieve high standards of safety performance. Suppliers providing onsite services are required to successfully complete and maintain stringent safety performance records and documentation via a third-party qualification process provider. Our approach to Health and Safety is governed by our <u>Health, Safety, Security, and Environmental</u> <u>Policy</u>, and the standards and policies set forth in the Equitrans Code. Suppliers' compliance with these policies is a fundamental requirement of providing services or materials to Equitrans.

Environment

We acknowledge the reality of climate change and are committed to implementing best practices to reduce greenhouse gas emissions across our operations; promote the protection, conservation, and sustainable use of biologically diverse ecosystems and habitats; and otherwise positively affect the communities in which we operate. Our commitment to the environment is an outgrowth of Equitrans' Core Values, including having integrity to do the right thing and maintaining excellence in all that we do. We require our Suppliers to comply with all applicable laws, regulations, and contractual requirements as a condition of conducting business with and on behalf of Equitrans.

Human Rights

Equitrans is committed to upholding dignity and respect for all people throughout its value chain. Consistent with our <u>Human Rights Policy</u> and the diversity and inclusion policies set forth in the Equitrans Code, Equitrans believes that each individual with whom we come in contact deserves to be treated fairly, equitably, and with dignity. Suppliers must conduct all their activities and operations in a socially responsible, non-discriminatory manner and in full compliance with all applicable laws. Simply stated, Suppliers must respect the human rights of workers and business partners and treat them with dignity and respect.

Employment Practices

Suppliers must conduct all their activities and operations in full compliance with all applicable laws including, but not limited to, those associated with equal opportunity, child labor, forced or compulsory labor, working hours, wages and benefits, and freedom of association.

Equitrans prohibits the use of any forms of forced labor, modern slavery, or human trafficking. All work must be voluntary, and workers shall be free to leave work or terminate their employment with reasonable notice.

Suppliers shall also ensure that third-party agencies providing workers are compliant with the provisions of the Equitrans Code, this Supplier Code, the Policies, and the laws of the sending and receiving countries, whichever is more stringent, in its protection of workers.

Suppliers must ensure that child labor is not used in the performance of the work or product delivered to Equitrans or any other company.

Equal Opportunity Rights and Anti-Harassment

We require our Suppliers to provide a workplace that is inclusive and free of unlawful discrimination based on race, color, religion, sex, gender identity, sexual orientation, national origin, age, disability, veteran status, pregnancy,

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political affiliation, union membership, civil status, or physical condition in hiring and employment practices such as promotions, rewards, and access to training. Suppliers are also expected to maintain workplaces that are free from all forms of harassment.

Wages and Labor Relations

Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Where no wage law exists, workers must be paid at least the minimum local industry standard.

We require our Suppliers to respect the rights of workers to join or form unions and/or collectively bargain without fear of reprisal, punishment, or harassment.

Supplier Diversity and Inclusion

We recognize that a strong, diverse supplier community is essential to economic vitality, and we value opportunities to conduct business with competitive, diverse organizations. This provides positive economic benefits and supports the communities in which we live and work.

Supplier diversity encourages the use of diverse businesses throughout the supply chain, providing an equal opportunity for qualified companies to earn Equitrans' business based on need, quality, safety performance, service, price, and terms and conditions.

Suppliers are expected to work cooperatively with diverse providers and to develop and utilize diverse suppliers of their own while performing work on behalf of Equitrans.

Supporting Local Communities

Equitrans is committed to supporting and investing in the communities where our employees live and work. Equitrans engages with stakeholders in our operating communities to understand their issues and concerns and to develop supportive solutions, as well as to pursue new opportunities for contributing to economic growth. As part of our continuing commitment, we encourage Suppliers to pursue new opportunities to promote economic development in these communities and engage with stakeholders in their own communities.

Ethical Behavior

Business Records

Suppliers are required to maintain complete and accurate books and records for all Equitrans transactions. Invoices must be accurate and other financial records must be prepared in accordance with generally accepted accounting principles, applicable legal requirements, and contractual terms and obligations. The creation, retention, and disposal of all business records must comply with applicable legal and contractual requirements.

Conflicts of Interest and Ethical Standards of Doing Business

Suppliers must disclose any potential conflicts of interest in writing to Equitrans prior to entering into any business transaction and during any business transaction that involves Equitrans. Avoiding conflicts of interest is critical to maintaining integrity in Suppliers' relationships with Equitrans. A conflict of interest exists any time there is a competing interest (financial or otherwise) that may interfere with a Supplier's ability to make an objective decision in their support of Equitrans' best interests.

Suppliers must not give any personal gifts, favors, or other compensation or business courtesies to Equitrans employees that are intended to influence, or appear to influence, a business decision or gain a competitive advantage. Any gifts or entertainment are prohibited if they do not comply with applicable law and/or are or could be construed as a kickback or a bribe as set forth in the Equitrans Code.

Equitrans requires all Suppliers to engage in the highest ethical standards during the sourcing process. Suppliers must refrain from discussing or disclosing their participation, pricing, costs, and any other contract terms with their competitors or any unauthorized parties at any time and especially during a competitive bidding process and an active contract term. Any part of a competitive bidding process, including a Request for Proposal, is confidential and proprietary to Equitrans.

We require our Suppliers to comply with all applicable competition and antitrust laws.

Compliance with Trade Laws

Suppliers are required to conduct their businesses in compliance with all applicable laws and regulations governing over international trade, including laws and regulations governing over the export and transfer of goods and services, the import of goods and sourcing of materials, and economic sanctions and embargoes.

All necessary information to support reasonable country of origin inquiries and due diligence with respect to the source of goods and materials must be provided upon request. Suppliers shall not use any conflict resources, including metals or minerals, which generate profit to, fund, or influence armed conflicts.

Resource Protection, Confidentiality, and Privacy

Consistent with the Equitrans Code, we expect Suppliers to safeguard Equitrans' information and protect its resources from loss, misuse, damage, or unauthorized use. Suppliers must use Equitrans' resources responsibly and only for legitimate business purposes. The personal use of Equitrans resources without prior written permission is prohibited. Equitrans' resources include, but are not limited to, Equitrans' facilities, equipment, direct materials, systems, technology, intellectual property, excess or waste materials, and consumables.

Suppliers granted access to Equitrans' information and operational technology assets, including hardware and software, are responsible for their employees' and business partners' full compliance with all requirements and procedures set forth in the current version of the Equitrans External Information Technology Policy which may be modified at Equitrans' discretion.

Suppliers shall not use Equitrans' intellectual property of any kind or nature, including trademarks, patents, copyrights, or trade secrets, without the prior written consent of Equitrans. Suppliers must protect and prevent the disclosure of Equitrans' confidential information and third-party confidential information entrusted to Equitrans including, but not limited to, confidential information of Equitrans' employees, business partners, customers, contractors, and other Suppliers. Suppliers should consider all non-public information to be confidential.

Insider Trading

Buying and selling securities based on material non-public information, as well as sharing non-public information, is strictly prohibited.

Product Quality

Suppliers will meet or exceed applicable laws and regulations as well as contractually agreed upon quality requirements.

Protecting the Equitrans Brand

We require Suppliers who interact with our stakeholders to conduct themselves at all times in ways that support and strengthen the Equitrans brand.

The use of the Equitrans brand by a Supplier or other third-party organization is not permitted without the prior written consent of Equitrans.

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Compliance with Supplier Code

Representatives of Equitrans shall be allowed to evaluate each Supplier's compliance with this Supplier Code and/or the Policies, while performing work for Equitrans. This includes on-site inspections of facilities and review of applicable records, books, or other documentation. Suppliers must ensure that Equitrans similarly has the right to evaluate their business partners' compliance as set out in the Equitrans Code and the Supplier Code.

A Supplier and any of its business partners will fully cooperate with any investigation related to their performance. A Supplier and its business partners must promptly correct any nonconformity(ies) identified by Equitrans.

Management Controls

We require our Suppliers to have in place the appropriate control measures at all levels of their own operations and across their supply chain to monitor compliance with this Supplier Code and the Policies and to promptly correct any non-compliance. Suppliers shall maintain policies and practices to allow violations, misconduct, or grievances to be reported and addressed without fear of retaliation.

Reporting Concerns

Suppliers, their employees, or their own supply chain must report any fraudulent financial reporting, misappropriation of assets, corruption, or other fraud-related malfeasance, illegal activity, fiscal waste or abuse, or other actual or suspected violations of the Equitrans Code, this Supplier Code, or the Policies by any party.

To report suspected misconduct or violations of the Equitrans Code, this Supplier Code and/or the Policies, contact the independent, third-party Equitrans Compliance Hotline at 844-513-8109 and/or the online <u>Compliance Reporting</u> <u>Portal</u>.