



**inter**pipeline

## **Whistleblower Policy**

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## 1. Purpose

Inter Pipeline Ltd. (“**Inter Pipeline**”) is committed to the highest standards of professional and ethical business practices as set out in its Code of Business Conduct and Ethics (the “**Code**”) and other Inter Pipeline policies. In furtherance of this commitment, it is critically important that Inter Pipeline maintains reporting avenues where serious concerns regarding actions or business practices that violate the Code or other IPL policies can be raised without fear of retaliation. This Whistleblower Policy (the “**Policy**”) outlines avenues available to report such serious concerns.

## 2. Scope and Application

This Policy applies to Inter Pipeline’s North American<sup>1</sup> business, including all Inter Pipeline North American subsidiaries, and all North American Inter Pipeline directors, officers, employees, contractors,<sup>2</sup> contingent workers<sup>3</sup> and anyone else who may be representing Inter Pipeline (all of the foregoing, collectively, “**IPL Representatives**”). This Policy is intended to provide avenues for IPL Representatives and other stakeholders to voice serious concerns regarding Inter Pipeline actions or business practices that violate the Code or other IPL policies.

## 3. What to Report

This Policy and the avenues of reporting provided in it are not for emergencies. If there is immediate threat to life, environment, or property contact Inter Pipeline’s 24-hour emergency number (1-800-727-7163) and/or local emergency services (e.g., police, fire, ambulance).

This Policy is intended to facilitate the reporting of serious concerns regarding Inter Pipeline actions or business practices that violate the Code or other Inter Pipeline policies and that could have significant impacts on Inter Pipeline or other stakeholders. Such concerns include, but are not limited to the following, all of which are required to be reported:

- a) violations or suspected violations of law, Inter Pipeline’s Code, or other corporate policies;
- b) dubious accounting, internal accounting controls, and/or audit practices or irregularities, including misleading or coercion of auditors or other third parties;
- c) disclosure of fraudulent or misleading financial information;
- d) fraud against or involving Inter Pipeline or any party having a business relationship with Inter Pipeline;
- e) serious, but non-emergency risks to the health, safety, or security of a worker, the public, or the environment;
- f) experiencing or observing harassment, violence, or other serious workplace misconduct;

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<sup>1</sup> Whistleblower reporting regarding Inter Terminals’ business operations in Denmark and Sweden is subject to different policies and procedures. Please visit [www.interterminals.com](http://www.interterminals.com) for more information.

<sup>2</sup> For purposes of the Code, “contractors” includes, but is not limited to, subcontractors, suppliers, consultants, representatives, agents, advisors, and service providers engaged by the Company.

<sup>3</sup> For purposes of the Policy, “contingent workers” include consultants and others, whether self-employed, incorporated, or made available to the Company through agency relationships, whose services are performed under contract to Inter Pipeline.

- g) serious risks to Inter Pipeline assets, property, or resources; or
- h) other Inter Pipeline actions or business practices that could amount to serious misconduct.

Where other Inter Pipeline policies contain reporting procedures, such as under the **Respectful Workplace Policy**, those should be used whenever possible instead of the reporting procedures set out in this Policy.

#### **4. Reporting and Investigating**

As a first step, we encourage IPL Representatives to report concerns to their immediate leader/supervisor or Inter Pipeline contact under applicable contract. If you do not feel comfortable reporting the concern in this manner or if you feel you have not received a satisfactory response, we recommend reporting concerns to Human Resources (i.e., Human Resources Business Partner), Legal (i.e., Legal Counsel, Associate General Counsel), Chief Ethics and Compliance Officer, or member(s) of the Inter Pipeline Executive Team (i.e., Vice Presidents, Senior Vice Presidents, Chief Financial Officer, or Chief Executive Officer). Concerns can be reported directly in person, via telephone, regular mail, or email. Any IPL Representative who receives a report made pursuant to this Policy shall forward it promptly to the those persons listed in the **Key Contact** information on page 5 of this Policy.

In the event you do not feel comfortable reporting to any of the above-referenced resources, we have set up a confidential Whistleblower Hotline with an independent third party that you can access. The Whistleblower Hotline has phone and web-based reporting options that are available twenty-four (24) hours a day, seven (7) days a week (details below):

- **Hotline Phone:** North America: 1-855-409-0971
- **Hotline Web:** [www.interpipeline.ethicspoint.com](http://www.interpipeline.ethicspoint.com)

You may also report through regular mail:

- **Mail:** Inter Pipeline Ltd.  
3200 2nd Street SW  
Calgary, AB, T2P 1M4  
Attention: Chief Ethics and Compliance Officer

To adequately investigate concerns brought forward, IPL Representatives are encouraged to provide as much specific information as possible when reporting, including names, dates, places, events that took place, supporting materials or documents, along with contact information that will enable follow up. If sufficient information is not provided and/or we are not able to follow up with reporters, we may not be able to engage meaningfully with the concern raised.

All reports made pursuant to this Policy will be communicated to the Ethics and Compliance Committee,<sup>4</sup> unless one or more members of the Ethics and Compliance Committee are connected to, or the subject matter of, the report in question. In respect of all reports, the Ethics

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<sup>4</sup> Titles of Inter Pipeline employees fulfilling the duties of the Ethics and Compliance Committee may change from time to time, however, the Ethics and Compliance Committee shall generally be comprised of at least 3 senior employees with representation from Legal & Compliance and People and Stakeholder Relations teams of Inter Pipeline.

and Compliance Committee will determine the appropriate investigation steps, if any. If deemed required by the Chief Ethics and Compliance Officer or Ethics and Compliance Committee, reports will also be forwarded to the Inter Pipeline Board of Directors or an appropriate member of the Board of Directors. Any specific concerns reported under this Policy regarding financial statements, accounting, internal accounting controls, or auditing practices or irregularities will be forwarded to the Chair of the Audit Committee. If the Chair of the Audit Committee deems it necessary, the report may also be forwarded to the full Audit Committee of the Board of Directors to review and consider any such matters reported and take the action it deems appropriate. Quarterly reporting on all whistleblower matters is provided to the full Board of Directors and/or full Audit Committee of the Board of Directors.

## **5. Anonymity and Confidentiality**

IPL Representatives making reports may request anonymity, however, anonymity is encouraged only where absolutely necessary due to the inherent difficulty it presents in assessing and following up on concerns. If you choose to remain anonymous and/or do not provide sufficient detail, we may not be able to engage meaningfully with the concern raised. Best efforts will be taken to ensure anonymity when requested, however, such treatment cannot be guaranteed and is subject to legal disclosure requirements. A reporter's identity may also be disclosed to those with a need to know (including but not limited to the Ethics and Compliance Committee) in order to progress and resolve reports.

All information disclosed during any investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with Inter Pipeline's policies and applicable laws. Records pertaining to a report and investigation are the property of Inter Pipeline and will be retained in compliance with applicable laws and Inter Pipeline's document retention policies and procedures. It is important for reporting IPL Representatives to understand that they may not be made aware of the outcome of their report or related investigation. Inter Pipeline will use best efforts to inform reporting IPL Representatives of the outcome of a report or investigation, however, legal, and other constraints, including privacy laws, may prevent Inter Pipeline from doing so.

## **6. Duty to Cooperate**

IPL Representatives have a duty to cooperate in any investigation being conducted by or on behalf of Inter Pipeline. If you fail to cooperate or provide false information in an investigation, Inter Pipeline may take remedial action commensurate with the severity of the offence, including termination of contract or employment, for cause.

## **7. Good Faith Reporting**

Inter Pipeline expects IPL Representatives to act in good faith and to not make false or malicious accusations in any report made pursuant to this Policy. Reporting in good faith does not mean that the information that you provide has to be correct, but it does mean that you must reasonably believe that the information is truthful and demonstrates at least a possible violation of Inter Pipeline's Code or other Inter Pipeline policy. Making any deliberately false or malicious allegations will be regarded as a serious disciplinary offence which may result in disciplinary action.

up to and including termination of employment (for cause), or termination of contract, and if warranted, further legal action may be taken by Inter Pipeline.

## **8. Prohibition on Retaliation**

Any IPL Representative who makes a report under this Policy in good faith, or who participates in an investigation arising from a report, will not be subject to retaliatory actions against them by Inter Pipeline. If you believe that you have been subject to any retaliation because of reporting a concern or participating in an investigation, you must immediately report this to a member of the Human Resources department or the Chief Ethics and Compliance Officer, as these actions will not be tolerated by Inter Pipeline. If you do not feel comfortable reporting to any of the aforementioned persons, you may access the Whistleblower Hotline described on page 3, above. Notwithstanding the foregoing, IPL Representatives who make a report and/or participate in an investigation arising from a report will continue to be held to Inter Pipeline job and/or contract performance expectations. Therefore, a reporting IPL Representative against whom legitimate adverse employment/contractual action is taken, or proposed to be taken, is prohibited from using this Policy and its protection against retaliation against Inter Pipeline's lawful actions.

## **9. Consequences of Non-Compliance**

Compliance with this Policy is a condition of IPL Representative employment or applicable contract. Policy violations may result in disciplinary measures, up to and including termination of employment (for cause) or contract, as applicable, as well as civil and criminal penalties.

## **10. Review and Approval**

This Policy has been reviewed and approved by the Inter Pipeline Board of Directors. The Chief Ethics and Compliance Officer will review this Policy annually, and will revise and update it, as necessary, subject to further review and approval by the Inter Pipeline Board of Directors.

## **11. Key Contacts**

If you have any questions on this Policy, or are in possession of a report made pursuant to the Policy, please contact:

**Associate General Counsel, Corporate  
and Chief Ethics and Compliance Officer**

3200, 215 – 2 Street SW  
Calgary, AB T2P 1M4  
Email: [kelly.bray@interpipeline.com](mailto:kelly.bray@interpipeline.com)  
Telephone: (587) 956-6227

**SVP & Chief Legal, People & Sustainability  
Officer**

3200, 215 – 2 Street SW  
Calgary, AB T2P 1M4  
Email: [kristen.simpson@interpipeline.com](mailto:kristen.simpson@interpipeline.com)  
Telephone: (403) 290-6156