Respectful Workplace Policy

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1.0 PURPOSE, APPLICABILITY AND SCOPE

1.1 Purpose

Inter Pipeline Ltd. ("**Inter Pipeline**" or "**IPL**") is committed to providing a workplace in which all individuals are provided the opportunity to be their best selves and perform to their highest capacity. Each of us has a personal responsibility to our colleagues and to Inter Pipeline to take an active role in achieving a safe and respectful work environment.

Inter Pipeline's vision of a respectful workplace is one in which acceptance, cooperation, courteousness, honesty, integrity, and personal accountability are emphasized in order for all employees to achieve excellence. Every person has the right to work in an environment that is safe, healthy and free from workplace *harassment*[1] *and violence*, which includes an environment free from *discrimination,* bullying and *sexual harassment*.

1.2 Applicability

This Respectful Workplace Policy (the "**Policy**")applies to all directors, officers, employees and to any individuals from outside the company, including contingent workers[2] and contractors,[3] (collectively, "**IPL Representatives**" or "**you**") of Inter Pipeline and its controlled subsidiaries (collectively, "**Inter Pipeline**", "**IPL**" "**we**", "**us**", "**our**", or the "**Company**") in their interactions with IPL employees or as representatives of IPL, and applies both during and outside of work hours, as well as within or outside of the workplace.

Examples of the application of this Policy include all interactions that occur on the company premises, or any other location where employees may engage in company business, activities, or social events. Other examples include tele/videoconferences and meetings, work-related social functions, work-related conferences or training sessions and work-related travel, including travel in company-supplied vehicles and personally-owned vehicles when being used for work-related purposes.

This Policy also applies to use of company provided smart or cell phones, computers, computer networks, social media or other electronic medium that directly or indirectly relate to IPL and IPL Representatives and to any other verbal, written, recorded or published comments or statements that directly or indirectly relate to IPL, occurring at or outside the workplace and during or outside work hours. For further information please refer to IPL's IP-IT-POL-0003 Social Media Policy.

1.3 Scope

IPL Representatives are required to comply with the personal behaviour and positive work environment requirements set out in our IP-LEG-POL-0005 Code of Business Conduct and Ethics. This Policy supplements and expands on those provisions. You must also comply with all applicable laws and regulations governing the subject matter of this Policy

Inter Pipeline is committed to eliminating or, if that is not reasonably practicable, controlling the hazards of workplace *harassment* and *violence.* IPL will not tolerate any

[1] Italicized words in this Policy shall have the defined meanings set out throughout this Policy.
[2] For purposes of this 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.
[3] For purposes of this Policy, "contractors" includes, but is not limited to, subcontractors, suppliers, clients, vendors, consultants, agents, advisors, and service providers engaged by the Company.

form of workplace *harassment* or *violence*. IPL will make every reasonably practicable effort to ensure that no worker is subjected to workplace *harassment* or *violence*. IPL will investigate incidents of workplace *harassment* or *violence* and take corrective action to address such incidents, as well as other contraventions of this Policy, by persons under IPL's direction including by taking disciplinary action up to and including termination of employment for just cause or contract for fundamental breach.

2.0 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

2.1 Definitions

Discrimination – *Discrimination* occurs when an individual or group is treated differently based on the grounds set out in the applicable human rights legislation, including those set out in Appendix A.

Examples include, but are not limited to: making jokes concerning a person's ethnic origin, failing to promote an employee because the supervisor is uncomfortable with the employee's sexual orientation, and the assumption that a single parent's child care arrangements will compromise his/her opportunity to work overtime hours.

Harassment – *Harassment* includes any inappropriate, objectionable or unwelcome conduct, comment, *bullying*, display, action or gesture that intimidates, offends, degrades or humiliates a particular person or group, as well as sexual harassment. *Harassment*:

(i) constitutes a threat to the health or safety of an individual;

(ii) is based on a statutorily protected or prohibited ground under the particular human rights, health and safety, employment standards or similar legislation applicable to the workplace of the employees involved, including those set out in Appendix A; or

(iii) adversely affects the individual's psychological or physical well-being and that the person knows or ought reasonably to know would cause an individual to be humiliated or intimidated.

To constitute *harassment* the following must be established:

1. repeated conduct, comments, displays, actions, or gestures; or
2. a single, serious occurrence of conduct or a single, serious comment, display, action, or gesture, that has a lasting, harmful effect on the individual.

Harassment does not include reasonable actions taken in good faith while exercising managerial/supervisory rights and responsibilities such as assigning work, including workplace accommodations, appraising performance, giving constructive feedback and taking progressive disciplinary action. Differences of opinion or minor disagreements between co-workers are also not generally considered to be workplace *harassment* but can turn into *harassment* if no steps are taken to resolve the conflict.

Sexual Harassment – *Sexual harassment* includes conduct, comment, display, action, gesture or contact of a sexual nature that is unwelcome, likely to cause offence or humiliation to the employee or that might, on reasonable grounds, be perceived by that employee as placing a condition of a sexual nature on employment or on any opportunity for training or promotion. Behaviour that is acceptable to both parties involved, such as flirtation, chit-chat, good-natured jesting or relationships of mutual consent would not be

considered *sexual harassment*. However, if one person no longer wants the behaviour or relationship to continue, then the conduct has the risk of being deemed *sexual harassment* should the behaviours continue. *Sexual harassment* is coercive and one-sided and anyone can be subjected to it.

Examples include, but are not limited to, a sexual solicitation or advance, unwanted physical contact, unwanted gestures or actions which have sexual connotations, unwanted verbal conduct, and denigration because of gender, including sexual orientation.

Violence – *Violence*, whether at the workplace or work-related, is defined as the attempted, threatened or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual *violence*. The conduct or behaviour may be verbal, written or physical.

Examples include, but are not limited to: physical fights (including pushing, slapping and punching), verbal or written threats that express an intent or have the potential to cause harm, threatening behaviour such as shaking fists, destroying property or throwing objects and any other act that would be reasonably expected to cause harm, injury or illness, or other words or gestures that would reasonably give rise to an apprehension of imminent harm, injury or illness.

3.0 RESPONSIBILITIES

3.1 Responsibilities

All IPL Representatives have a responsibility to treat everyone with dignity and respect and contribute to establishing IPL's vision of a respectful workplace, as described above. Additionally, all IPL Representatives have the responsibility to refrain from causing or participating in the *discrimination, harassment* or *violence* of another IPL Representative. Persons subject to this Policy must report incidents of *discrimination*, *harassment,* or *violence*, whether experienced or observed, in a timely manner.

Without limiting an individual's ability to report any violation of this Policy or otherwise seek assistance, an individual who experiences or observes behaviour that causes concern but, in the individual's view, does not amount to *discrimination*, *harassment* or *violence,* may inform the person whose behaviour is causing concern that their behaviour is unwelcome and request that they stop the behaviour. Where an individual believes an incident of *discrimination*, *harassment* or *violence* has occurred the incident must be promptly reported in accordance with this Policy regardless of whether the individual has requested that the behaviour stop. In any instance where an individual is not comfortable directly addressing the person, they should promptly report in accordance with this Policy.

Persons involved in conduct that may constitute workplace *discrimination*, *harassment* or *violence*, whether as witnesses, complainants or respondents, must fully cooperate with investigations or other applicable processes, including maintaining confidentiality with respect to all matters relating to a complaint and any investigation or resolution thereof.

3.2 Confidentiality

IPL will preserve confidentiality regarding all incidents of workplace *discrimination*, *harassment* and *violence.* IPL will not disclose the circumstances related to an incident of

workplace *discrimination*, *harassment* or *violence*, including the names of the complainant, the respondent, and any witnesses, except (i) where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident (ii) where necessary to inform employees of a specific or general threat of workplace *violence* or potential workplace *violence*, or (iii) as required or authorized by law. IPL will disclose only the minimum amount of personal information that is necessary to inform employees of a specific or general threat of workplace *violence* or potential workplace *violence*.

4.0 REPORTS OF WORKPLACE *HARASSMENT* OR *VIOLENCE*

4.1 Complaints of Workplace *Harassment* or *Violence*

All complaints and incidents will be handled expediently with consideration and respect for the complainant, respondent, witnesses and all parties involved. IPL, in consultation with the Joint Health and Safety Committee, has developed IP-HR-PRC-0002 Workplace Harassment Prevention and Response Procedure and IP-HR-PRC-0001 Violence Prevention and Response Procedure, which describes:

- Training of IPL staff on the Respectful Workplace Policy, Workplace Harassment Prevention and Response Procedure, and Violence Prevention and Response Procedure;
- Information about the nature and extent of the hazard of workplace harassment or violence;
- Measures to eliminate or control the hazard of workplace harassment and violence;
- Specific procedures to report incidents and to access immediate assistance when an incident of violence occurs; and;
- The process to investigate and document a complaint or incident and how the results of the investigation will be communicated.

IPL requires employees to report actual or potential breaches of this Policy in accordance with this Policy and the processess outlined in IP-HR-PRC-0002 Workplace Harassment Prevention and Response Procedure or IP-HR-PRC-0001 Workplace Violence Prevention and Response Procedure. However, nothing in this Policy prevents or is meant to discourage an employee from calling the police, referring a complaint of discrimination, harassment or violence to the applicable regulatory body, including, if applicable, to request the assistance of an occupational health officer to resolve a complaint of harassment, or from exercising their rights pursuant to any other law, including filing a complaint with the Alberta Human Rights Commission pursuant to the *Alberta Human Rights Act* or the Saskatchewan Human Rights Commission pursuant to *The Saskatchewan Human Rights Code, 2018*.

Employees who have experienced workplace harassment or violence are encouraged to seek assistance from the Company-provided Employee and Family Assistance Program or to consult an appropriate health care professional of their choice for treatment or referral.

You can also report through the Company's reporting hotline.

If you are not comfortable with any of the above resources for reporting purposes, to facilitate the reporting of suspected violations, especially in circumstances where the reporting individual wishes to remain anonymous, suspected or actual violations of this policy may be reported to the independently operated hotline that can be accessed via telephone or the internet (the "Reporting Hotline") in accordance with Inter Pipeline's Whistleblower Policy or via mail.

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 in order to progress and resolve reports.

The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. Details for these methods of reporting are as follows:

Ethics hotline: 1-855-409-0971

Ethics website: www.interpipeline.ethicspoint.com

Mail: Inter Pipeline Ltd.
3200 2nd Street SW
Calgary, AB, T2P 1M4

Attn: Chief Ethics and Compliance Officer

5.0 REVIEW, REFERENCES AND RELATED DOCUMENTS

5.1 Review

This Policy has been reviewed and approved by the Inter Pipeline Board of Directors. Human Resources will review this Policy regularly and bring any material changes to the Board of Directors for review and approval as needed.

5.2 References

List of internal publications related to the topic of this policy.

1. IP-LEG-POL-0005 *Code of Business Conduct and Ethics*
2. IP-HR-PRC-0001 *Workplace Violence Prevention and Response Procedure*
3. IP-HR-PRC-0002 *Workplace Harassment Prevention and Response Procedure*
4. IP-IT-POL-0003 *Social Media Policy*

5.3 Related Documents

List of relevant external publications related to the topic of this policy.

1. Alberta Human Rights Act, RSA 2000, c A-25.5
2. (Alberta) Occupational Health and Safety Act, SA 2020, c O-2.2
3. (Alberta) Occupational Health and Safety Code, Alta/Reg 191/2021
4. The Saskatchewan Human Rights Code, 2018, SS 2018, c S-24.2
5. (Saskatchewan) Occupational Health and Safety Regulations, RRS c S-15.1 Reg 10
6. The Saskatchewan Employment Act, SS 2013, c S-15.1

6.0 QUESTIONS

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7.0 APPENDIX A - LIST OF ALBERTA AND SASKATCHEWAN'S LEGISLATION

Jurisdiction	Protected or Prohibited Grounds	Commissions	Applicable Laws
Alberta	Race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation.	**Alberta Human Rights Commission Northern Regional Office** 800 Standard Life Centre 10405 Jasper Avenue NW Edmonton, AB T5J 4R7 **P:** (780) 427-7661 **F:** (780) 427-6013 **Alberta Human Rights Commission Southern Regional Office** 200 J.J. Bowlen Building 620 7 Avenue SW Calgary, AB T2P 0Y8 **P:** (403) 297-6571 **F:** (403) 297-6567	*Alberta Human Rights Act*, RSA 2000, c A-25.5 *Occupational Health and Safety Act*, SA 2020, c O-2.2 *Occupational Health and Safety Code*, Alta Reg 191/2021
Saskatchewan	Race or perceived race, creed, religion, colour, sex, sexual orientation, family status, marital status, disability, physical size or weight, age, nationality, ancestry, place of origin, receipt of public assistance or gender identity.	**Saskatchewan Human Rights Commission** 8th Floor, Sturdy Stone Bldg 122-3rd Avenue North Saskatoon, SK S7K 2H6 **P:** (306) 933-5952 **Toll free:** 1-800-667-9249 **F:** (306) 933-7863 **TTY:** (306) 373-2119	***The Saskatchewan Human Rights Code, 2018,*** *SS 2018 c S 24.2*SS 1979, c S-24.1 Provisions respecting discriminatory practices and the worker's right to file a complaint with the Saskatchewan Human Rights Commission: 29. ***The Saskatchewan Employment Act,*** SS 2013, c S-15.1 Provisions dealing with harassment and the right to request assistance of an occupational health officer to resolve a complaint of harassment: 3-1(1)(l), (o), (4) and (5); 3-8 – 3-10; 3-31 – 3-36; 3-54; 3-67; and 4-5. ***Occupational Health and Safety Regulations,*** RRS c S 15.1 Reg 10