

ANTI-BRIBERY & CORRUPTION POLICY

POLICY AND PURPOSE

Energy Transfer LP, Energy Transfer Operating LP, its subsidiaries and affiliates, including Sunoco LP (collectively, the “Company”) are committed to conducting business in accordance with both applicable law and high ethical standards. This Anti-Bribery & Corruption Policy (the “Policy”) covers the U.S. Foreign Corrupt Practices Act (“FCPA”) and other similar anti-bribery and corruption legislation (collectively, “Anti-Bribery & Corruption Legislation”) that are applicable to the countries in which the Company conducts business.

This Policy applies to all employee, contractors, agents, consultants, and all officers and directors of the Company (hereinafter “Company Personnel”). All Company Personnel must familiarize themselves with any anti-bribery and corruption policies or procedures that apply to their areas of responsibility and complete any required anti-bribery and corruption training, as applicable. No Company Personnel has the authority to act in any manner inconsistent with the provisions of this Policy or to authorize, direct, or condone violations of its terms by another person. Violations of this Policy will result in appropriate disciplinary action, up to and including termination.

Additionally, failure to comply with this Policy or Anti-Bribery & Corruption Legislation may result in disgorgement of profits, significant fines, reputational damage, imprisonment of individuals, and debarment of the Company from conducting business with local and national governments. General violations of the FCPA may result in individual fines of up to \$250,000 and/or imprisonment for up to five years. Willful violations of the books and records provision of the FCPA by an individual may result in fines of up to \$5 Million per violation and/or imprisonment up to 20 years.

PROHIBITED PAYMENTS AND ACTIVITIES

This Policy prohibits the corrupt offer, promise, authorization, or payment of anything of value to a foreign official to obtain or retain business or to secure an improper business advantage by an employee, officer, director or agent acting on behalf of the Company.

What Does “Corrupt” Mean?

“Corrupt” means the intent to influence a Foreign Official to misuse their official position in exchange for anything of value. This Policy prohibits the **attempt** to make a payment to influence a Foreign Official and does not require that the corrupt act succeed in its purpose.

What Does “Anything of Value” Mean?

“Anything of Value” includes anything with objective or subjective value, such as gifts, travel, entertainment, promises of future employment, or charitable contributions made at the request of a Foreign Official. So long as it is intended to secure action by the recipient, a payment of any

size can violate this Policy and Anti-Bribery & Corruption Legislation.

What Does “Foreign Official” Mean?

“Foreign Official” includes any officer or employee of a foreign government or any department, agency, or instrumentality thereof, or of a Public International Organization¹, or any person acting on its behalf.

Foreign Officials also include officers and employees of companies under foreign government ownership or control, such as a state-owned petroleum company. This means that common trading partners that the Company conducts business with in foreign countries may be staffed by Foreign Officials. Every employee of these companies, regardless of their role or level, is considered a Foreign Official.

Example of state-owned entities in the energy sector, include, but is not limited to:

- China National Offshore Oil Corporation (CNOOC) (China state-owned)
- PetroChina (China state-owned)
- Sinopec (China state-owned)
- Petrobras (Brazil state-owned)
- Ecopetrol (Columbia state-owned)
- Oil and Natural Gas Corporation (“ONGC”) (India state-owned)
- Eni (Italian state-owned)
- Pertamina (Indonesia state-owned)
- Kogas (Korean state-owned)
- Pemex (Mexico state-owned)
- Statoil (Norway state-owned)

What Does “Obtain or Retain Business” or “Secure an Improper Business Advantage” Mean?

This Policy prohibits payments made to secure or direct any type of business advantage, such as securing business opportunities, obtaining confidential information, securing government licenses, or obtaining special tax or customs treatment. If the improper payment is intended to advance the Company’s business interests, then it is prohibited.

What Does “Agent” Mean?

An “Agent” is any consultant, distributor, contractor, or other third party who acts on behalf of the Company. This includes any third party that makes business contacts for the Company, re-sells the Company’s products, acts as a customs broker or freight forwarder, or interacts with Foreign Officials with regard to the Company’s business.

¹Public International Organizations are designated from time to time by Executive Order of the President of the United States and currently includes the United Nations, the World Bank, the International Monetary Fund, the International Red Cross, the World Trade Organization, and many other organizations.

GIFTS, TRAVEL AND ENTERTAINMENT

While the offering or giving of certain gifts, travel and entertainment may be customary in the commercial business environment, they may be entirely unacceptable in dealings with domestic or foreign governments. There are strict laws that govern the offering or giving of gifts, meals, entertainment, transportation and lodging, to certain government (domestic or foreign) officials, employees and consultants.

Due to the sensitive nature of these relationships, Company Personnel must **not** provide gifts or anything of value (e.g., paying for travel or providing entertainment) to government officials, employees, consultants, or members of their families, in connection with Company business without written approval from the Office of Ethics and Compliance or the Legal Department.

Exception: The only exceptions to this requirement for prior written approval are for promotional items that contain a Company logo, commemorative mementos, and ‘thank you’ gifts with a value of \$250.00 or less that are being provided to a Foreign Official. If the promotional items are being provided to a domestic government employee, a \$20 value threshold applies. As certain foreign countries and domestic government agencies have varying limits for gifts and entertainment that must not be exceeded, always check that the official can accept the hospitality or entertainment. Gifts that can easily be converted to cash or a cash equivalent, such as gift cards, are never permitted.

For additional guidance on gifts, travel and entertainment, refer to the *Anti-Bribery & Corruption Supplemental Guidelines*.

ACCOUNTING AND RECORDKEEPING REQUIREMENTS

This Policy requires the Company to create and maintain books, records, and accounts that, in reasonable detail, accurately reflect the Company’s business transactions. In the case of payments to public or Foreign Officials, this requires a full description of those payments and its relation to such public or Foreign Official.

Further, Company Personnel must never:

- Knowingly enter into any invoicing or payment arrangements that would enable others to violate this Policy or any other applicable law;
- Make any false, incomplete, or misleading entries, or disguise or mischaracterize any aspect of a transaction;
- Establish or maintain undisclosed or unrecorded funds or transactions for any purpose;
- Issue invoices that do not have a legitimate purpose or improperly portrays the true nature of the transaction; or
- Use personal funds to accomplish what is otherwise prohibited by Company policy.

In addition to the accounting and bookkeeping requirements, the Company must create and maintain a system of internal accounting controls sufficient to assure that:

- Transactions are executed in accordance with management’s general or specific authorization;
- Transactions are recorded to allow preparation of a report that is in conformity with generally accepted accounting principles;
- Access to assets is permitted only in accordance with management’s general or specific authorization; and
- The recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

FACILITATION PAYMENTS

Facilitation payments are facilitating or expediting payments made to a foreign government or official to secure a routine government action. Examples of ‘routine government action’ include processing visas, providing police protection, and supplying telephone, power, or water service.

While facilitation payments are permitted under the FCPA, they are strictly prohibited by the laws of most countries and thus, prohibited by this Policy unless approval is obtained from the Office of Ethics and Compliance. If Company Personnel finds themselves in a situation where they reasonably believe that their health or safety is at risk (e.g., facing imminent physical harm), the payment may be allowed. Under these circumstances, any facilitating payments made must be reported to the Office of Ethics and Compliance immediately, once it is safe to do so.

RESPONDING TO A REQUEST FOR AN IMPROPER PAYMENT

Under no circumstances should Company Personnel make an improper payment because it appears to be an “easier” way to complete a project or task. If a potentially inappropriate request is received, Company Personnel must refuse to make the improper payment and explain that the Company is forbidden by law from making such payments. Company Personnel must immediately report a request for an improper payment to the Office of Ethics and Compliance or the Legal Department.

COMMERCIAL BRIBERY

Commercial Bribery refers to the bribery of private individuals, domestic or foreign. This Policy prohibits all forms of bribery, regardless of whether the dealings are with a Foreign Official or private individual.

ANTI-KICKBACK ACT

Company Personnel are required to comply with the U.S. Anti-Kickback Act. This act prohibits the offering, giving, soliciting, or receiving any money or anything else of value to or from U.S. Government personnel, prime contractors, or subcontractors (either directly or indirectly through third parties) for the purpose of (i) Obtaining, retaining, or directing business; or (ii) Bestowing or receiving any kind of favored treatment.

POLITICAL CONTRIBUTIONS

Political contributions made by or on the behalf of the Company can have potentially serious ramifications for the Company due the varying restrictions imposed by federal, state and local governments. Political contributions to foreign governments warrant special attention as the purpose of such contributions could be misconstrued as payments to obtain or retain business in a given country.

In an effort to avoid inadvertent violations of domestic or foreign political contribution laws, no Company Personnel may make any contribution to candidates for public office, political organizations, political parties, or political campaigns on behalf of the Company or in furtherance of the Company's business activities without written consent from the Office of Ethics and Compliance or the Government Affairs department.

These restrictions are not applicable to individual political contributions made by persons exclusively on their own behalf.

DUE DILIGENCE AND SELECTION OF FOREIGN COUNTERPARTIES

Prior to conducting business with a foreign-based third party or a third party with a foreign-based parent entity having 50% or greater interest, the Office of Ethics and Compliance must be notified to ensure that a due diligence screening is conducted. For more information on the due diligence process, refer to the *Anti-Bribery & Corruption Supplemental Guidelines*.

CONTRACTUAL AGREEMENTS

The Company's agreements with third party parties involving business activities that are subject to this Policy should include provisions pertaining to Anti-Bribery & Corruption Legislation and the right to audit.

HUMAN TRAFFICKING

The Company is required to abide by and is committed to complying with all laws pertaining to human rights trafficking activities and specifically, the requirements of the Trafficking Victims Protection Act.

This Policy **prohibits** employees, contractors, subcontractors, and agents from engaging in human trafficking activities related to the Company's business endeavors, including:

- Engaging in severe forms of trafficking in persons²
- Procuring commercial sex acts
- Using forced labor
- Destroying or denying access to an employee's identity or migration documents such as passports or drivers' licenses
- Using misleading or fraudulent practices during the recruitment of employees or offering employment
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- Charging employees or potential employees recruitment fees
- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a U.S. Government contract
- Providing or arranging housing that fails to meet the housing and safety standards
- Failing to provide an employment contract or work document where required by law

If an employee becomes aware of any violation of this Policy, they should immediately contact the Office of Ethics and Compliance.

TRAINING

Applicable Company Personnel will be required to complete trainings pertaining to this Policy, as applicable. Applicable Company Personnel shall include, but not be limited to, employees that are directly engaged in international work activities, have an administrative responsibility for supporting international business activities, or are engaged in international invoice processing.

²Severe forms of trafficking in persons means (i) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (ii) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

MONITORING & REPORTING

Protecting the Company's reputation is every employee's responsibility. If you suspect or are aware of any potential violation of this Policy or Anti-Bribery & Corruption Legislation, notify the Office of Ethics and Compliance or the Legal Department. A report can also be made anonymously to the confidential toll-free helpline at either 1-800-228-5687 or 1-888-332-3592. The helpline is administered by an independent third-party and is available 24-hours a day / 7 days a week.

Retaliation against any employee who in good faith reports a suspected violation will not be tolerated.

ADDITIONAL GUIDANCE

Refer to the *Anti-Bribery & Corruption Supplemental Guidelines* for additional guidance related to this Policy. If you have any questions regarding this Policy or Anti-Bribery & Corruption Legislation, contact the Office of Ethics and Compliance or the Legal Department at officeofethicsandcompliance@energytransfer.com.