



ANTICORRUPTION POLICY

POLICY AND PURPOSE:

Energy Transfer LP and Energy Transfer Operating, L.P. and their respective subsidiaries and affiliates (collectively, the “Company”) are committed to conducting their business in accordance with both applicable law and high ethical standards. The Foreign Corrupt Practices Act (“FCPA”) and other anti-corruption laws (collectively, the “Anticorruption Laws”) are applicable to the manner in which the Company and its employees conduct business. The Anticorruption Laws make it illegal to bribe public or government officials or private persons.

This Anticorruption Policy (“Policy”) applies to all employees of Company (hereinafter “Company Personnel”) and all officers and directors of the Company. Violations of this Policy will result in appropriate disciplinary action, up to and including termination. The Company also maintains procedures relating to agents, who are required to conduct their affairs in accordance with all applicable Anticorruption Laws, when conducting business on behalf of the Company.

PROHIBITED PAYMENTS AND ACTIVITIES UNDER THE FCPA:

The FCPA prohibits: (1) the corrupt (2) offer, promise, authorization, or payment (3) of anything of value (4) to a public official (5) to obtain or retain business or to secure an improper business advantage (6) by an employee, officer, director or agent acting on behalf of the Company. The Anticorruption Laws cover payments made directly or indirectly (*i.e.*, through the use of an agent, consultant, intermediary, or other third party). Further, the FCPA mandates strict recordkeeping requirements. To the extent legal payments are made, failure to keep accurate records of any such payments is actionable under the FCPA.

What Does “Corrupt” Mean?

“Corrupt” means the intent to induce the public official to misuse his or her official position in exchange for the item of value. The FCPA does not require that a corrupt act succeed in its purpose. Instead, the FCPA prohibits any attempt to make any payment with the intent to influence the act of a public official in his or her official capacity, or a private person with the goal of obtaining or retaining business.

What Does “Anything of Value” or “Financial Advantage” Mean?

These terms are very broad, and include anything with objective or subjective value, such as cash, entertainment, promises of future employment, or charitable contributions made at the request of a public official. So long as it is intended to secure action by the recipient, a payment of *any* size can violate the FCPA.

What Does “Public Official” Mean?

The term “public official” includes traditional government officials (legislators, judges, regulators), members of public organizations (such as the United Nations or the International Monetary Fund), and political party candidates. Most importantly, it can include even employees of a government-owned or government-controlled company, such as a state-owned petroleum company. This means that common trading partners that the Company may do 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 “public official.” An example of such state-owned entities in the energy sector, includes, 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), and Statoil (Norway state-owned).

What Does “Obtain or Retain Business,” “Secure an Improper Business Advantage,” and Securing the “Improper Performance” of a “Relevant Function or Activity” Mean?

The FCPA prohibits payments made to secure or direct any type of advantage, including securing business opportunities, obtaining confidential information, securing government licenses, or obtaining special tax or customs treatment. Basically, if the improper payment is intended to increase the Company’s profitability, or advance its business interests, then it is prohibited by the FCPA.

What Does “Agent” Mean?

An “agent” is any consultant, distributor, contractor, or other third party who acts on behalf of the Company. This includes a party who makes business contacts for the Company, a party who sells products in a foreign territory (or to a foreign customer), a customs broker or freight forwarder, or any other person or entity who interacts with public officials with regard to the Company’s business. Because the FCPA forbids the use of third parties to effectuate a bribe, all payments through agents are forbidden in the same manner as for Company Personnel.

Is Commercial Bribery Covered?

Although the FCPA does not apply to bribery of private individuals, other U.S. laws reach this conduct. Accordingly, this Policy applies equally in all dealings conducted on behalf of the Company, regardless of whether the dealings are with a public official or private individual. All forms of bribery, including of private individuals, are prohibited by the Company.

ANTI-KICKBACKACT

Company personnel are required to comply with the U.S. Anti-Kickback Act (“Act”). The 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 through third parties) for the purpose of: (1) obtaining, retaining, or directing business; or (2) bestowing or receiving any kind of favored treatment.

GIFTS, MEALS, AND ENTERTAINMENT FOR GOVERNMENT OFFICIALS

The FCPA contains narrow exceptions that allow limited entertainment and gifts when provided for a legitimate business purpose. To the extent any gift or entertainment is given, the gift or entertainment must be reasonable in nature, accurately recorded on the books and records, and most importantly cannot be given in return for action taken by a public official or a private individual. Because it is difficult to determine whether such gifts or entertainment are allowed, prior approval by the Compliance Department is required before providing gifts to a public official (unless they fall within the exceptions listed in this section below).

A request for prior approval should include:

- the name and position of the public official(s) recipient(s);
- the reason why the gift is being given; and
- a description of the item provided, including its fair market value, and the business purpose.

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. Note: gifts that easily can be converted to cash or a cash equivalent, such as gift cards, are *never* permitted.

For meals and entertainment, any payments that exceed \$250.00 paid to a public official, or that involve more than one payment per quarter to the same public official, require prior approval from the Compliance Department.

Providing gifts or entertainment to any U.S., state, or local official or government employee may be illegal under state or local law, due to some governments maintaining strict regulations regarding payments to officials or government employees. Always check that the official can accept the hospitality or entertainment. Because the rules vary from jurisdiction to jurisdiction, you cannot make any such payments without prior approval from the Compliance Department or the Legal Department.

U.S. GOVERNMENT OFFICIALS AND EMPLOYEES

Independent of the FCPA, the U.S. Government also maintains strict rules regarding payments to U.S. officials and employees. You may not offer, promise, or provide any gifts, gratuities, or business entertainment of any kind to any U.S. Government official or employee without the prior written approval of the Compliance Department or the Legal Department. Consistent with the Federal Office of Government Ethics, the only exception is for items of nominal value (*i.e.*, \$20.00 or less), provided such gifts do not exceed \$50.00 per calendar year.

Note that some federal, state and local government agencies have their own rules regarding gifts and gratuities and the policy may be more stringent than this Policy (*e.g.*, a lower definition of nominal value). In such a case, personnel are required to adhere to the applicable federal, state and local government agency rules.

TRAVEL

It is permissible, in certain situations, for the Company to host U.S. Government and foreign employees and officials at company facilities. Because of the difficulties of determining what is permissible under this exception, you should not pay or offer to pay the travel expenses of such government persons without the prior written permission of the Compliance Department or the Legal Department.

DUE DILIGENCE AND SELECTION OF AGENTS

The Anticorruption Laws applicable to the Company apply to payments made through third parties if the Company does not take appropriate steps to prevent it. This would include instances of “willful blindness” if the Company failed to recognize and follow-up on “red flags” that indicated the possibility of an improper payment. To minimize risk under the Anticorruption Laws, all Company agents *must* be identified and selected on the basis of commercial and technical expertise and not, for example, because of a special relationship with a public official. Contact the Compliance Department or the Legal Department for any guidance.

RECORDKEEPING AND INTERNAL ACCOUNTING REQUIREMENTS

The Company’s policy is to abide by all applicable laws and regulations in those countries in which it may do business. This includes a commitment not to knowingly enter into any invoicing or accommodating payment arrangements that would enable others to violate U.S. or other laws or facilitate such violations. The recordkeeping provisions of the FCPA require publicly traded companies to fairly and accurately reflect transactions on their books and records.

The recordkeeping provisions also require maintenance of an internal control system for detecting and preventing improper payments to public or foreign officials.

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. Company Personnel should never:

- 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;
- use personal funds to accomplish what is otherwise prohibited by company policy;
- issue invoices that exceed the normal invoice price level; or
- invoice third parties when doing so is not necessary to serve a legitimate purpose or where doing so improperly portrays the true nature of the transaction.

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. Instead, when 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 Compliance Department or the Legal Department.

POLITICAL CONTRIBUTIONS

Political Contributions (Domestic). Making political contributions can have political ramifications for the Company. The federal government, and each state government, maintains various restrictions on political contribution. Accordingly, no Company Personnel (including third-party agents) 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 Compliance Department or the Government Affairs Department. These restrictions are not applicable to individual political contributions made by persons exclusively on their own behalf.

Political Contributions (Foreign). Political contributions and activities outside the United States warrant special attention because the purpose of such contributions and activities could be misconstrued as payments to obtain or retain business in a given country. Since the Company could be potential buyers from and suppliers to governments throughout the world, the legality of such contributions might be questioned if they appear to be closely connected to particular business relationships, or are so large as to suggest that an understanding exists for a return benefit. To avoid inadvertent violations of foreign political contributions laws, no Company Personnel (including third-party agents), shall make any political contributions on behalf of the Company in any foreign country without prior approval from the Compliance Department or the Government Affairs Department.

ADDITIONAL GUIDANCE

Because the FCPA and other applicable Anticorruption Laws are complicated, the Compliance Department and the Legal Department are available to provide additional guidance on this Policy. Attached to this Policy are also Supplemental Guidelines on Anticorruption. It is your responsibility to read and comply with this Policy, and to seek appropriate guidance from the Compliance Department and the Legal Department when in doubt or if you have questions.

MONITORING & REPORTING

Applicable Company Personnel shall annually certify their compliance with this Policy through annual training. Applicable Company Personnel shall include, but not be limited to, all executive and middle management and professional personnel that are directly engaged in international work activity, or have administrative responsibility for international activity management, or are a services provider for the international activities. In addition, any personnel that are directly engaged in international invoice processing shall be trained.

If you are assigned to an international project or have a responsibility to an international project and have not completed the annual FCPA training certification, contact the Compliance Department.

If you suspect any potential or actual violations of law or company policies, it is your obligation to contact the Company's Compliance Department or to call its confidential toll-free hotline at either 1-800-228-5687 or 1-888-332-3592.

The hotline is administered by an independent third-party and is available 24-hours a day / 7 days a week. Calls are anonymous unless you choose to leave your name and contact information. The Company does not allow any form of retaliation based upon the use of the hotline or the reporting of any violations of the law or company policies.