

Supplier Code of Conduct



Spectra Energy takes seriously our commitment to safety, social responsibility, diversity, environmental leadership and ethical business practices, ensuring that the decisions we make today are also the right decisions for the future. This commitment is at the core of how we do business. We expect our suppliers to adhere to our fundamental values, policies, procedures and our Supplier Code of Conduct and apply them to how they do business. We have relationships with our suppliers that focus on value creation for all stakeholders. Suppliers must assist Spectra Energy in enforcing this Supplier Code of Conduct (the Code) by communicating its principles to their supervisors, employees and suppliers. This Code further details our expectations and the work practice requirements of our suppliers.

Spectra Energy's Purpose

We create superior and sustainable value for our investors, customers, employees and communities by delivering natural gas, natural gas liquids and crude oil to premium markets.

Spectra Energy's Values

Stewardship – Demonstrating a commitment to environmental responsibility and vibrant communities

Integrity – Ethically and honestly doing what we say we will do

Respect for the Individual – Embracing diversity and inclusion, enhanced by openness, sharing, trust, leadership, teamwork and involvement

Safety – Sharing a relentless commitment to a zero work-related injury and illness culture

High Performance – Accountability, achieving superior business results and stretching our capabilities

Win-Win Relationships – Having relationships which focus on the creation of value for all parties

Initiative – Having the courage, creativity and discipline to lead change and shape the future

Being a sustainable company means being a responsible company. We are an important link in the natural gas value chain: gathering and processing, transmission and storage, and distribution. Our integrated oil transportation network connects producers to refiners. Foremost, we believe in effectively operating our business in a safe and reliable way.

Expectations of Business Conduct

Sustainability

Spectra Energy is committed to Sustainability. We seek to work with contractors and suppliers who contribute to sustainability and integrate economic, environmental and social considerations into their business decision making.

Health and Safety

Our suppliers will have a systematic approach to health and safety designed to adhere to all local, state and federal regulations and continuous performance improvement. Suppliers must apply safe and healthy work practices, including regulatory and contract specific requirements, to all activities, and exercise good judgment in work decisions. Suppliers performing work on Spectra Energy property or on our behalf must instill safety in every aspect of their work processes and in the attitude and behavior of all their employees. Our Suppliers and their employees are required to comply with all Spectra Energy policies and procedures related to safety and report any safety issues to Spectra Energy immediately while working at any of our

facilities. Additionally, we expect our suppliers to instill in their employees the same safety values that we require from any employee, visitor, contractor or service provider.

Environmental

Spectra Energy strives to be an industry leader in respecting our environment. We are committed to meeting or exceeding all applicable regulatory requirements and seek ways to positively affect the communities in which we operate. Suppliers must respect the environment in compliance with all applicable environmental laws and regulations and conduct their operations in an environmentally responsible manner.

Social Performance

Contractors and Suppliers must respect their neighbors and contribute to the societies in which they operate.

Spectra Energy's Resources

Spectra Energy's resources include, among other things, property, assets, intellectual property and confidential information. Suppliers are responsible for safeguarding our resources used in the course of performing their work and must make every effort to ensure the protection of all our resources. These resources must only be used for legitimate business purposes to advance the interests of our company. The personal use of Spectra Energy resources without permission is prohibited. The intellectual property rights of Spectra Energy and third parties with whom we work must be honored at all times. Confidential information can be shared only within the Supplier's company on a need to know basis. The supplier is obligated to inform Spectra Energy of any situation that may constitute a violation of our property rights. Buying and selling securities based on material non-public information, as well as sharing non-public information, is prohibited and could result in serious civil and criminal penalties.

Brand and Trademarks

We expect suppliers who interact with our customers to conduct themselves at all times in ways that reinforce and strengthen the Spectra Energy brand. Use of Spectra Energy's brand is not permitted without express written permission of the Public Affairs Department of Spectra Energy. Under no circumstances are third parties allowed to display the brand of Spectra Energy.

Accounting and Business Records

All financial books, records and accounts must accurately reflect the underlying activity and conform both to generally accepted accounting principles and system of internal controls. Likewise, all operational records must be accurate, timely and conform to Spectra Energy requirements. Suppliers must create, retain and dispose of business records in full accordance with applicable legal and contractual requirements. Spectra Energy reserves the right from time to time to monitor supplier records as they pertain to work being performed for Spectra Energy.

Conflict of Interest

Suppliers must disclose any potential conflicts of interest in writing to the Spectra Energy Supply Chain Organization for review and approval prior to entering into any business transaction that involves Spectra Energy. A conflict of interest exists any time there is a choice between a personal interest (financial or otherwise) and the interests of Spectra Energy. A conflict may arise with suppliers that employ or are partially or fully controlled by a Spectra Energy employee or family member. Suppliers, their employees or their families cannot receive improper benefits through the relationship with Spectra Energy or allow other activities to conflict with acting in the best interests of Spectra Energy.

Treatment of Others

Spectra Energy believes that each individual with whom we come in contact deserves to be treated fairly, honestly and with dignity. We do not condone any form of harassment, discrimination or inappropriate actions or language of any kind. We reserve the right to ask any supplier's employee to leave our property if he/she does not honor these requirements and work in a manner that supports Spectra Energy's values.

Gifts and Entertainment (Business Courtesies)

Suppliers must not give any personal gifts, favors or other compensation or business courtesies to Spectra Energy employees that are intended to influence, or appear to influence, a business decision. Spectra Energy maintains the highest ethics standards and is sensitive to even the appearance of improprieties. Suppliers failing to observe our ethical requirements will be disqualified from conducting business with Spectra Energy. Suppliers are required to comply with the Spectra Energy Code of Business Ethics document and adhere to the practices outlined in it.

Supplier Diversity

Supplier diversity encourages the use of underutilized suppliers such as diverse owned, women owned and veteran owned businesses. We expect our business partners to utilize and develop diverse suppliers of their own while performing work on our behalf. Suppliers may be required to report to Spectra Energy on a yearly basis the amount of spend with qualified diverse companies that can be contributed as part of purchases made by Spectra Energy.

Employment Practices

Suppliers must conduct all their operations in a socially responsible, non-discriminatory manner and in full compliance with all applicable laws. Suppliers must respect the human rights of workers, and treat them with dignity and respect as understood by the international community. Suppliers shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities. Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government issued identification, passports, or work permits as a condition of employment. Suppliers shall ensure that third-party agencies providing workers are compliant with the provisions of this Code and the laws of the sending and receiving countries, whichever is more stringent in its protection of workers. Suppliers shall ensure that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker. Suppliers shall not employ children. Child labor is strictly prohibited.

Compliance with Laws, Rules and Regulations

Suppliers are required to comply with the letter and the intent of all applicable legal requirements including those dealing with bribery, kickbacks, corruptions and other prohibited business practices. The antitrust laws and Foreign Corrupt Practices Act of the United States prohibit a wide range of transactions or practices by both purchasers and sellers of goods and services. Various energy regulatory commissions have specific codes and standards of conduct that address matters such as undue discrimination and preferential treatment between regulated companies and their affiliates. Spectra Energy intends to fully comply with these laws.

Business Continuity

In some instances, Spectra Energy's assets provide critical infrastructure to the energy industry. Therefore, our suppliers are expected to have plans in place for their business operations to continue with minimal interruption of supply in the event of an emergency, crisis situation, natural disaster or terrorist/security related event.

Continuous Improvement

We are committed to continuous improvement and strive for best practices in our business. We recognize that suppliers have experience with multiple companies and industries, and expect our suppliers to identify opportunities for improvement in our work and bring to Spectra Energy attention all best practices.

Compliance

Ethical Dealings

Spectra Energy strives to always engage in the highest ethical practices in source selection, negotiation, award decisions and the administration of purchasing and sourcing activities. We require suppliers, their employees and their subcontractors to comply with the requirements of this Code. We reserve the right to conduct visits to verify that a supplier's business operations meet the expectations of Spectra Energy as outlined in this Code. Remediation plans will be developed for significant deficiencies.

Failure to address significant deficiencies within the time set out by Spectra Energy will result in cancellation of contracts.

Competitive Protocol

Spectra Energy requires all suppliers to engage in the highest ethical standards during the source selection process. Suppliers must refrain from discussing or disclosing its pricing, costs, and any other contract terms with their competitors specifically during a competitive bidding process.

The Request for Proposal (RFP, or any RFx) is both confidential and proprietary to Spectra Energy. Suppliers must not reference an RFx in any publicity without prior written consent from Spectra Energy.

The Point of Contact (POC) stated in the RFP is the sole point of contact for any matter related to an RFx. No other person at Spectra Energy must be contacted regarding that specific sourcing initiative, nor should the RFx be discussed with any other Spectra Energy employee other than the POC.

Questions and Concerns

Suppliers, their employees, or their subcontractors must report any questionable behavior by the supplier, their agents, Spectra Energy employees or other suppliers. Fraudulent financial reporting, misappropriation of assets, corruption and other fraud-related malfeasance, illegal activity, fiscal waste or abuse, or other suspected violations by any party must be reported by:

- Contacting your Spectra Energy Supply Chain representative.
- Contacting Spectra Energy's EthicsLine by phone at 1-877-733-8442 or by going online to www.spectraenergy-ethicsline.com. The EthicsLine is operated by a third party and all contact is treated anonymously if you select that option.
- Contacting Spectra Energy's Ethics Office at ethicsoffice@spectraenergy.com.

If you have any concerns or questions about Spectra Energy's Supplier Code of Conduct, we encourage you to discuss them with your supply chain representative.