

# SUMMIT MIDSTREAM GP, LLC

## WHISTLEBLOWER POLICY

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The following policies and procedures (“Policy”) have been adopted by the Audit Committee of the Board of Directors of Summit Midstream GP, LLC (the “General Partner”), the general partner of Summit Midstream Partners, LP (the “MLP” and, together with its subsidiaries and the General Partner, the “Company”) to encourage the early identification of suspected illegal activities or unethical behavior throughout all levels of the Company.

### POLICY

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The Company expects its employees, officers, and directors to conduct business with the highest standards of integrity, and to respect and comply with the Company’s policies and procedures, including the Code of Business Conduct and Ethics (“Code of Conduct”). The Company further expects its employees, officers, and directors, as well as the Company’s vendors, contractors and customers, to comply with all of the laws, rules and regulations of the United States and other countries, and the states, counties, cities and other jurisdictions in which the Company conducts its business, and the laws, rules and regulations that are applicable to the Company (collectively the “Applicable Laws”). With respect to environmental matters, the Company also expects its employees, officers, and directors, as well as the Company’s vendors, contractors and customers to comply with the Company’s Environmental Management System, as well as the obligations in any plea, settlement, administrative, or consent agreement or order into which the Company has entered (collectively, the “Applicable Standards”). This Policy refers to the Applicable Laws and the Applicable Standards together as the “Applicable Laws and Standards.”

This Policy provides avenues for any individual, including an employee, officer, director, vendor, contractor, or customer, to report violations or suspected violations of, or any concerns regarding non-compliance with, Company policies or procedures, the Code of Conduct, and Applicable Laws and Standards (“Reports”). It is the policy of the Company to treat Reports seriously and investigate Reports expeditiously.

Company employees, officers, directors, and contractors have a duty and responsibility to submit Reports in good faith regarding any conduct or suspected conduct that could be a violation of Company policies, the Code of Conduct, or Applicable Laws and Standards. In addition, Company employees, officers, directors, and contractors have a duty and responsibility to submit Reports in good faith regarding any conduct or suspected conduct that could be illegal or unethical or any concerns regarding non-compliance with Company policies, the Code of Conduct, or Applicable Laws and Standards. Company employees, officers, directors, and contractors should submit a Report even if they are not certain that the conduct or suspected conduct rises to the level of a violation of Company policies, the Code of Conduct, or Applicable Laws and Standards.

Examples of conduct or suspected conduct about which Reports should be submitted include, but are not limited to:

- criminal offenses;
- fraud against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to the SEC or members of the investing public;

- violations of any government agency rules and regulations applicable to the Company;
- intentional errors in the preparation, review or audit of any financial statement of the Company;
- significant deficiencies in or intentional noncompliance with the Company's internal accounting controls;
- conduct that may cause harm to the health and safety of any individual;
- conduct that may cause harm or damage to the environment or property; and
- any concern about a potential violation of the Code of Conduct or Applicable Laws and Standards.

## **PROCEDURES**

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### **1. REPORTING AVENUES**

- A. **Reporting Hotline:** Reports (including anonymous Reports) may be submitted by employees and others via telephone using the hotline at 1-844-741-1993. The intake phone call will be received by a third-party contractor specifically engaged to provide the hotline services, or an internal person specifically designated to receive hotline calls. Any party receiving calls on the hotline will be supervised by the Chief Compliance Officer. Regular training and safety meetings at the Company will include information regarding the availability of the hotline.
- B. **Ethicspoint Website:** Reports (including anonymous Reports) may be submitted online at the Company's designated ethicspoint website, <https://summitmidstream.ethicspoint.com>.
- C. **Written Reports:** Reports (including anonymous Reports) may be submitted in writing to the Company at the following address:
- Summit Midstream Partners, LP  
910 Louisiana, Suite 4200  
Houston, Texas 77002  
ATTN: Audit Committee of the Board of Directors of Summit Midstream GP, LLC and the Chief Compliance Officer.
- D. **Anonymity, Confidentiality, and Good Faith:**

Individuals submitting a Report by telephone, online or in writing may choose to either identify themselves or submit the Report anonymously. The Company will conduct an investigation of a Report in a confidential manner, consistent with the need to conduct a thorough investigation. Generally, this means that Reports will only be shared with those who have a need to know and understand the Report for purposes of the investigation.

Reports must be made in good faith and based on reasonable grounds to believe that the information reported constitutes conduct or suspected conduct covered by this Policy. Reports that are not made in good faith or are made with knowledge that the facts in the Report are false may subject the reporting individual to disciplinary or other appropriate action.

Internal Reports are encouraged. However, nothing in this Policy prohibits an employee from reporting possible violations of law to any governmental agency or making disclosures that are protected under the whistleblowing provisions of any applicable law or regulation.

## **2. TREATMENT OF REPORTS**

- A. The Chief Compliance Officer of the Company (the "Chief Compliance Officer") or designated Company legal counsel is responsible for promptly reviewing, investigating and responding to each Report, including documenting concerns raised in such Reports. The Chief Compliance Officer has the discretion to determine how to conduct the investigation, including personally investigating the Report or assigning another employee, outside counsel, advisor, expert or third-party service provider to investigate, or assist in investigating, the Report. The Chief Compliance Officer will seek to ensure that investigations are handled thoroughly and promptly.
- B. Reports about accounting, internal accounting controls, auditing matters, or questionable financial practices will be reviewed under Audit Committee direction and oversight by the Company's Chief Compliance Officer, internal audit manager or such other persons as the Audit Committee or Chief Compliance Officer determines to be appropriate.
- C. The goal of the investigation is to assess if there has been a violation of Company policies, the Code of Conduct, or Applicable Laws and Standards as well as if any illegal or unethical behavior has occurred, and if so, the nature and extent of such violation or behavior. Appropriate action will depend on the particular circumstances, but may include disciplinary action, up to and including termination of employment, termination of the vendor/contractor relationship, reports to law enforcement, or legal action as appropriate. The Chief Compliance Officer shall initiate, monitor and document actions taken as a result of such Reports.
- D. Company employees, officers, directors and contractors are expected to cooperate in the investigation, to provide requested information and/or documentation, and to tell the full and complete truth. Failure or refusal to cooperate in an investigation or to provide truthful and complete information may result in disciplinary action, up to and including termination of employment, termination of the vendor/contractor relationship, or other appropriate action.

## **3. ACCESS TO REPORTS AND RECORDS AND DISCLOSURE OF INVESTIGATION RESULTS**

- A. In most cases, the Chief Compliance Officer will notify the individual who submitted the Report that the Report was received, the investigation was conducted, and appropriate action, if any, was taken.
- B. All records associated with Reports are considered confidential information and access will be restricted to members of the Audit Committee, the Company's legal department, and employees of the Company or outside counsel involved in the investigation of the Report as contemplated by this Policy. Access to records may be granted to other parties at the discretion of the Audit Committee.
- C. Reports, investigations, and any actions taken as a result of an investigation, will generally not be disclosed to the public except as required by any legal or regulatory obligations.

#### **4. PROHIBITED RETALIATION**

The Company prohibits retaliation against any person for complying with this Policy, including by: (a) submitting communications to the Audit Committee regarding a Report; (b) submitting a Report; (c) providing information in good faith relating to possible violation of the Code of Conduct or Applicable Laws and Standards to (i) any personnel of the Company, (ii) any regulatory or law enforcement agency, or (iii) any member of state or federal legislative bodies or their committees; (d) participating or assisting in the investigation of a Report; and (e) participating or assisting in any proceeding relating to the foregoing. In addition, the Company will comply with all Applicable Laws and Standards and stock exchange rules that prohibit retaliation against employees who lawfully submit Reports.

Any individual who believes that he or she has been subjected to retaliation as a result of complying with this Policy should contact the Chief Compliance Officer or designated Company legal counsel. The individual may also submit a Report of retaliation through the avenues stated in this Policy.

Policy Revision Date: November 3, 2021