

Ethics Hotline – FAQ's

1) *What is EthicsPoint?*

EthicsPoint is a comprehensive and confidential reporting tool hosted by a third-party service provider, NAVEX to assist Trans Mountain in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. The tool serves as Trans Mountain's Ethics Hotline and allows anyone to file a report anytime, either by phone or online. EthicsPoint does not trace phone calls and does not maintain any electronic information that would identify you. The online tool will ask you to complete a form which will capture the details of your report. By phone, an EthicsPoint representative will ask for the same information and will transcribe your responses on your behalf. A Trans Mountain ethics representative will then be electronically notified once your report has been submitted.

2) *Why do we need a system like EthicsPoint?*

Having an Ethics Hotline protects Trans Mountain and its people, and we believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity. It provides an accessible means for both the public and Trans Mountain Personnel to report a concern, or ask a question, with the option to do so anonymously.

Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee. While not a publicly traded company, Trans Mountain recognizes this as a best practice and is committed to upholding the highest standards of ethics reporting. Having an open channel of communication is simply good business. It promotes a workplace of reporting, compliance and accountability. We believe the Ethics Hotline will increase the effectiveness of our reporting and monitoring systems while supporting a culture of integrity and ethical decision-making.

3) *How do I make a report?*

You are encouraged to report your concern to your immediate leader. If you are not comfortable doing so, you may contact any Executive Officer, Legal or Internal Audit. The Ethics Hotline is an external reporting system that is confidential, easy to use, and always available to you. You have the ability to file a confidential, anonymous report via either telephone or internet:

Online: transmountain.ethicspoint.com

Toll Free: Call 1-844-725-1314 to reach a call centre that is available 24/7.

Alternatively, you may contact The Audit Committee Chair. This provides a means to address concerns independent of the entire Trans Mountain organization.

4) *What type of situations should I report? What if I am unsure?*

The EthicsPoint system is designed for anyone to report any violation of our Code of Business Conduct and Ethics, or any other concern you may have.

You should report a violation or suspected violation as soon as you are aware of it. Any matter that has the potential to harm people, property or Trans Mountain's reputation must be reported.

Ideally, you should report your concerns to your direct supervisor. We recognize, however, that there may be circumstances when you are not comfortable reporting an issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

If you work for Trans Mountain and are unsure about what to report, you are encouraged to discuss the situation with your leader. If you are not comfortable doing so, you may contact any Executive Officer, Legal or Internal Audit. When in doubt, file a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

5) Why should I make a report?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if something is wrong. By working together, we can maintain a healthy and productive work environment. Corporate misconduct presents a serious threat to Trans Mountain, so if you know of any incidents of misconduct or ethical violations, it is your duty to yourself and your coworkers to report it.

Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve our corporate culture and performance.

6) Where do reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to the VP Regulatory and Compliance and Internal Audit who are charged with evaluating the report. In the event that your report implicates either of these individuals or groups, they will be excluded from the investigation. Each of these report recipients has had training in keeping these reports in the utmost confidence.

7) Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication. We have carefully chosen EthicsPoint as an effective reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

8) Can I remain anonymous?

Yes. Trans Mountain will respect the anonymity of anyone who raises a legitimate concern whenever it is requested. However, if you choose to remain anonymous and do not provide sufficient detail, we may not be able to initiate or conduct an effective investigation. Note that your anonymity will be protected but it cannot be guaranteed. Your identity may be disclosed to

those who need or are required to know by law. It may also be disclosed should it overtly impede the progress of the investigation.

Should you choose to file an anonymous report, the EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

It is important to note that EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available when making a report online. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. A report from anywhere online will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

By phone you will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery. Using either method, you will have an opportunity to identify yourself – only if you wish.

9) What if my boss or other managers are involved in a violation? Won't they get the report and cover it up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. In addition, the system has limited access available only to the VP Regulatory and Compliance and Internal Audit.

10) What will happen to me if I file a report?

A Trans Mountain ethics representative will review your report and determine the next steps. Further investigation may be required, and you may be contacted to provide more information. If you filed a report through EthicsPoint, you will be assigned a system generated report key and will be prompted to create a password. Keep this information so you may follow-up on the status of your report.

The participation of all Personnel to openly raise concerns without fear of retribution, retaliation, or inaction is vital to the success of the Code of Business Conduct and Ethics. Trans Mountain strictly prohibits any form of retaliation against anyone who would make a report in good faith. These individuals shall be protected from retaliation and those attempting to retaliate against them shall be subject to disciplinary measures.

11) Who investigates reports?

The investigation of reports is generally coordinated through Internal Audit who may engage subject matter experts depending on the nature of the complaint. These experts may be individuals from Trans Mountain Legal, HR, Security, SSER, Supply Chain, and/or Operations. External expertise may be retained when required. All reports are confidential and will only be discussed with those who need or are required to know.

12) How can I follow-up on my report?

You may follow-up on your report through the EthicsPoint system using the report key and password information that was provided to you. Neither Trans Mountain or EthicsPoint retains this information, so it is important that you write it down and keep it safe, as it may be your only means of communication with the investigation team. Should you misplace your report key you can always make a new report, noting previous filing.

You are encouraged to check the status of your report in EthicsPoint and submit more information through the system. This follow-up capability presents an anonymous dialogue between you and the company. All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

If you submitted a report by some other means you may simply ask the person you reported to and they will provide you with as much information as is appropriate. Note that the details of an active investigation cannot be discussed, and any outcomes or potential outcomes are confidential.

13) How long will it take for a case to be closed?

The length of the investigation will vary depending on the nature and complexity of the report. All reports will be taken seriously and will be thoroughly investigated. The investigation team will always try to advance the investigation in a timely manner.

14) Will I be informed of the results of the investigation and any action taken?

No. You will be informed when the investigation has been concluded. Due to the confidential nature of any investigation, as well as legal and privacy concerns, all findings must remain confidential and will not be disclosed. If legal action is required, details of the case may become public knowledge through court proceedings and legal processes as per normal course.

15) What happens if a report is made in “bad faith”?

A report made in “bad faith” is a report that is not true or misleading, often motivated by malicious intent for false pretenses. Making a deliberate false report is a serious offence that may result in legal, and disciplinary action, up to and including dismissal.

Reports made in “good faith” are when someone has an honest belief that a violation of Trans Mountain’s Policies or Procedures, or an illegal act, has occurred. No action will be taken against anyone who makes a report in good faith. Trans Mountain prohibits any retaliatory action against anyone who makes a report in good faith. These individuals shall be protected from retaliation and those attempting to retaliate against someone for making a report shall be subject to disciplinary measures. However, disciplinary measures may be taken against Personnel who participated in the prohibited activity, even if they reported it.

16) What are the consequences of a violation or breach of the Code of Business Conduct and Ethics?

Consequences and disciplinary measures will vary depending on the nature and severity of the offense. Each situation will be assessed on a case-by-case basis, considering the weight of the evidence reviewed and the risk to the organization.

17) Will reports be accepted through means other than the Ethics Hotline?

Yes. Trans Mountain will investigate any reportable matter raised through the appropriate channels, whether by letter, email, phone, in person or other means. The appropriate channels include your immediate supervisor or executive officer, Internal Audit or the Audit Committee Chair. For more information, refer to Trans Mountain's Whistleblower Policy.

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