

TRANS MOUNTAIN EXPANSION PROJECT

WORKER CODE OF CONDUCT

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1.0 OVERVIEW

This document outlines expectations and requirements regarding worker conduct for all people engaged in work activity during construction of the Trans Mountain Expansion Project (TMEP or the Project), including Trans Mountain Corporation (Trans Mountain or TMC) direct employees and employees and sub-contractors of companies contracted (Contractors) by Trans Mountain. All workers are ambassadors of the Project and are expected to act accordingly.

All Contractors hired by Trans Mountain during the construction phase shall have a Worker Code of Conduct for its employees and sub-contracted individuals related to their work on the Project. Each Contractor's Worker Code of Conduct must address the requirements in this TMEP Worker Code of Conduct.

Violation of any of the rules and principles contained in the TMEP Worker Code of Conduct, or Trans Mountain policies, will result in discipline up to and including possible termination of employment or contract. Trans Mountain reserves the right to deny access to the worksite by any worker at any time for violations of this Worker Code of Conduct.

2.0 COMPLIANCE WITH LAW

Workers must comply with all applicable laws and regulations in the Project locations, including pipeline right-of-way, facility sites, camps, and the general Project area and surrounding communities. No one will commit or condone an unlawful act under federal, provincial or municipal law or instruct another employee or Contractor to do so.

3.0 HEALTH, SAFETY AND ENVIRONMENT

Trans Mountain is committed to providing a safe working environment for its employees and Contractors and ensuring safety of the public. All workers are required to follow: the TMEP Health and Safety Management Program, which includes the TMC Environment, Health and Safety Policy; Part 126, Duties of Employees, of the Canada Labour Code; Part 2 of the Alberta *Occupational Health and Safety Act* "obligation of employers, workers", etc.; British Columbia's *Workers Compensation Act*, Part 3, Division 3, Section 116 "General Duties of Workers"; the Canadian *Human Rights Act* as it pertains to construction worksite; TMC's Respect in the Workplace Policy, which includes violence, harassment and bullying policies; and TMC's Diversity and Inclusion policy.

Workers must understand the nature of the Environmental Plan commitments and must follow all requirements outlined in the Environmental and Compliance Education Program required prior to starting work and as outlined in TMEP's Environmental Handbook.

4.0 DRUG AND ALCOHOL USE

Trans Mountain is committed to providing a safe drug and alcohol-free workplace. Trans Mountain has zero tolerance for use of, or being under the influence of, drugs or alcohol in the workplace. Workers must come to work fit for duty and must know and follow the requirements outlined in TMC's Drug and Alcohol Policy.

Unless explicitly allowed in marked, designated areas of appropriately licenced camps, alcohol is prohibited in all areas of the camp facilities, and anywhere else within the camp site or lease including consumption in vehicles. Trans Mountain has a zero-tolerance policy for the use of cannabis on company property, including worksites, camp communities as well as during company functions. On investigation, confirmation of alcohol/contraband found or used in camp rooms will result in dismissal from the camp, the spread/worksite, and the entire TMEP.

5.0 RESPECTFUL BEHAVIOUR/HARASSMENT

Workers must comply with TMC's Respect in the Workplace Policy. As such, workers are prohibited from harassing, discriminating against, threatening, bullying or intimidating other workers, visitors, community members, government officials, supervisors or managers in any way (including on basis of race, religious beliefs, colour, place of origin, gender including gender identity and expression, mental or physical disability,

ancestry, family status, age, or sexual orientation) at the workplace, in construction camps, and in local communities. This pertains to the utterance of threats of violence, real or implied, through any means (e.g., verbal, cyber).

All workers must comply with the Project's Indigenous Relations Policy.

6.0 WORKPLACE VIOLENCE AND POSSESSION OF WEAPONS

Workers are prohibited from engaging in acts of violence, including fighting, at any time while working on the Project. Violence is defined as the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm. It can include: physical attack or aggression; threatening behaviour; verbal or written threats; and sexual violence.

Workers must comply with TMC's policies regarding firearms and other weapons. As such workers and guests, regardless of whether or not licensed to do so, are prohibited from bringing onto the worksite or onto any Project-related premise, or being in possession of any weapon (whether or not concealed) including but not limited to guns, knives with the exclusion of those required for work purposes, and other types of weapons. Any item used to injure another person will also be viewed as a weapon.

7.0 DRIVING STANDARDS

The conduct of drivers while operating Project-related vehicles is important to worker safety and the safety of community residents and other road users, and to minimizing effects on local protective services. Workers must follow the Project driving standards outlined in the TMEP Health and Safety Management Program and Contractors own standards.

8.0 AFTER-HOURS CONDUCT

Trans Mountain expects all Project workers to conduct themselves in an appropriate manner at all times, including during their off hours. This includes but is not limited to anyone who may be travelling to or from a camp, commercial or personal residence. It is important that the people living in the vicinity of the Project are treated with respect and consideration during the Project construction timeframe. Workers residing in camps must abide by camp policies, and those residing in commercial residences are guests of the community.

To minimize pressure on local and regional medical, emergency, and social services, workers are expected to make use of available medical and social support services provided by Contractors to the extent possible.

Workers' use of community facilities and services may be perceived as positive or negative depending on the desires of the host community. Guidance, prohibitions and/or opportunities related to workers' off-duty use of community services, recreational facilities and outdoor recreation areas in specific communities in each spread must be included in each Contractor's Worker Code of Conduct as part of the Community Orientation Package/Program. Trans Mountain will ensure the Contractors understand the community's interests with respect to workers' use of local or regional recreational amenities, outdoor recreation areas or other community services in Project locations. Trans Mountain encourages worker volunteering in the community, recognizing it is a personal choice to do so.

Worker use and enjoyment of the environment when off-duty must be done in full compliance with all laws and regulations. Project workers are prohibited from hunting, fishing and trapping and gathering plants within or along the right-of-way and at other construction sites including but not limited to Trans Mountain facilities and premises.

Workers are prohibited from possessing or storing any firearm, bows, or crossbows, whether or not concealed, at a Project worksite, on any Project owned or leased premises (including construction camps), or in work vehicles. Fishing equipment, snowmobiles and all-terrain vehicles not used for work on the Project are prohibited at worksites and in work vehicles.

9.0 AWARENESS AND ENFORCEMENT

Contractors' Worker Codes of Conduct are expected to include a description of the process by which Contractors will ensure all workers are aware of and understand the Code of Conduct and of consequences for not following the Worker Code of Conduct. It is expected that all workers will, at a minimum, sign off on the Worker Code of Conduct that is applicable to them and their worksite.

Contractors' Worker Codes of Conduct should include guidance, as part of the Contractor's overarching disciplinary policy, on how discipline will be determined and implemented for all conduct categories.

Trans Mountain reserves the right to amend, update, revise or otherwise change the Code of Conduct expectations and rules at any time. Contractors will be made aware of any changes, and Contractors will be expected to update their Contractor Worker Codes of Conduct accordingly and communicate any changes in an effective and timely manner to all Project-related workers.

10.0 SUMMARY OF REFERENCED LAWS, REGULATIONS, POLICIES AND PROGRAMS

- *Alberta Occupational Health and Safety Act, Part 2*
- *Alberta Occupational Health and Safety Act, Part 35*
- *British Columbia Workers Compensation Act, Part 3, Division 3, Section 116*
- *British Columbia Occupational Health and Safety Regulation, Section 3.12*
- *Canada Labour Code, Part 126*
- *Canadian Human Rights Act*
- *Criminal Code of Canada, Section 217.1*
- TMC's Environment, Health and Safety Policy
- TMC's Drug and Alcohol Policy
- TMEP Environmental Protection Plans
- TMEP Health and Safety Management Program
- TMEP Indigenous Relations Policy
- TMC's Respect in the Workplace Policy
- TMC's Diversity and Inclusion Policy