

DT Midstream Code of Conduct

A Message from Our President & CEO

At DT Midstream, we know that what we do – and how we do it – makes a difference. It matters to our communities, customers, investors, suppliers and to each other. Acting with integrity, accountability and respect for each other is fundamental to how we do business.

Our Code of Conduct helps us to understand what's expected of us and why. It offers guidance on the rules and policies we must follow and the kinds of behavior that's considered in bounds – and out of bounds. It also provides resources to help you make good decisions and explains where to go for help if difficult situations arise.

I believe we all want to do the right things, and our Code of Conduct helps us to accomplish that. Please take time to review this document and reach out to your leader if you have questions.

David Slater
President & CEO



Our Culture



Our Commitment



Our Workplace



Our Company



Our Community



Our Market



Our Resources



Our Culture

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Our Market

- Insider Trading
- Fair Competition
- External Communications (including social media)

Our Resources

Our Culture

Our Mission

Responsibly deliver reliable clean energy

Our Strategy

By executing best-in-class energy solutions



Who We Serve

Our Team
Our Customers
Our Communities
Our Investors

How We Serve

Safe
Caring
Dependable
Efficient

What We Do

Inspire
Innovate
Deliver

Our Aspiration



How We Serve



Safe

Practice safe and healthy behaviors in everything we do.

- Learn, practice and share safety and wellness behaviors
- Openly speak up about safety concerns and incidents

We take action to protect ourselves and others.

- Identify and correct unsafe behaviors and situations
- Protect each other and the public through shared safety practices
- Stop unsafe work responsibility

Caring

We project positive energy.

- Greet, welcome and thank others
- Engage in positive conversations
- Assume positive intent

We care for others.

- Embrace diversity, equity and inclusion
- Treat everyone as an individual with respect and compassion
- Demonstrate empathy in our actions

Dependable

We do what we say we are going to do every time.

- Listen, repeat and respond
- Take ownership of tasks and follow through
- Deliver on promises in a timely manner

We act with a shared sense of purpose beyond our individual role.

- Know how our actions impact others
- Connect people to the right resources
- Act on opportunities to serve

Efficient

We perform our roles efficiently.

- Act with a sense of urgency
- Complete our work and learn from our mistakes
- Use time and resources as if they are our own

We identify better ways to do our work.

- Resolve issues at the point of activity
- Eliminate waste and work-arounds
- Work as a team to solve problems and build partnerships

What We Do

Inspire



Innovate



Deliver



Inspire

Foster belonging

Welcome everyone, connect authentically and cultivate engagement

Support well-being

Care for each person's well-being and ensure physical and emotional safety

Communicate for impact

Make our purpose real through storytelling, gratitude and recognition

Innovate

Collaborate for excellence

Partner with others to achieve the best possible results for our stakeholders

Create breakthroughs

Lead change courageously and seek new ideas

Grow every day

Encourage a growth mindset and continuous learning so we can do our best work

Deliver

Act with integrity

Be ethical, honest, and transparent

Achieve results

Prioritize and deliver what matters to drive customer service, performance excellence and growth

Lead with grit

Passionately pursue excellence and persevere through challenges



What is our Code of Conduct?

Our Code of Conduct, our highest-level policy, is the centerpiece of our commitment to living our values and conducting our business according to the highest ethical standards and in compliance with the law. It will always be a good place to start the search for guidance about how to put our values into practice every day because it:

- Highlights the principles that guide our business conduct.
- Provides a common reference point to help each of us understand what the company expects of us.
- Provides practical advice on how to comply with laws and regulations.
- Provides requirements and guidance about how we should relate to colleagues, customers, communities, vendors and government entities.
- Helps us find other policies and useful information sources.
- Helps us resolve difficult questions about business conduct and explains how to seek guidance or report a concern.

Our Code of Conduct also includes guidance about what actions are “in bounds” and “out of bounds,” as well as practical questions and answers about situations we may encounter on the job. Remember, however, that our Code of Conduct does not provide exhaustive information about every single company policy or every situation in which a question of ethics or compliance may arise. That would be impossible. Instead, the company relies on each of us to exercise good judgment in deciding if our Code of Conduct covers an issue in sufficient detail to help make the right decision and act in accordance with our values. If not, then we should seek further guidance from a leader or any of the other sources identified here.

Do a Quick “Gut Check”

If you have a question about your conduct that is not answered here, you should ask yourself:

- Is it legal?
- Is it consistent with our culture?
- Am I being fair and honest?
- Would I be unwilling or embarrassed to tell my family, friends or co-workers about my actions?
- Could my actions appear inappropriate?
- How would I feel if my conduct or actions were printed on the front page of the newspaper?

These questions may help you perform an instant “gut check.” If the answers make you uncomfortable, then trust your gut and seek further guidance before you act.

Expectations for All Employees

Who has to follow our Code of Conduct?

Our Code of Conduct applies to all DT Midstream employees. Additionally, contractors and consultants, when working on our behalf, must act consistently with our Code of Conduct.

When we follow our Code of Conduct, we demonstrate our commitment to living our culture, aspiration and service keys. As employees, we are responsible for:

- Being familiar with and following our Code of Conduct at all times.
- Seeking help when we have a business conduct, ethical or compliance question that isn’t answered here.
- Complying with all applicable laws and regulations in performing our duties.
- Reporting any conduct that may violate our Code of Conduct.

Failure to comply with the Code of Conduct can result in disciplinary action, up to and including termination of employment.

Q: I think one of my coworkers violated a company policy, but I can't be sure. I am not an expert on the subject. What should I do?

A: You should always speak up if you think misconduct has taken place. You are not responsible for getting enough information to be sure, only for reporting in good faith what you observed.

Expectations for Leaders

Leaders also are responsible for:

- “Casting a positive shadow.” That means leading by example, modeling our values and always living up to these standards.
- Helping team members understand and follow these standards as well as any other policies, practices, requirements or laws that apply to their work.
- Fostering an environment where employees feel comfortable asking questions, seeking guidance and reporting issues.
- Seeking guidance for or escalating and reporting concerns brought to them by their team members that they can't resolve themselves.
- Supporting those who raise a concern or report a suspected problem – and never taking or allowing retaliatory action against someone for reporting in good faith a concern or suspected violation.

Reporting Concerns

Q. How do I report concerns?

A. Based on the situation and your comfort level, talking to your leader is usually a good first step. Being open, honest and direct is often the most effective and efficient way to resolve questions and issues. If your concern involves your leader or you are not comfortable discussing the matter with your leader, you may report your concern to any of the following:

- Your next-level leader
- Human Resources at 313.774.3174 ext. 2
- Ethics and Compliance Office at 313.774.3174 ext.3
- Ethics Helpline at 855.222.0671 or www.lighthouse-services.com/dtmidstream

These resources will treat your question or complaint confidentially and share the information only to the extent required to investigate the concern and only with those who need to know.

If you have a concern about any form of business conduct and want to remain anonymous, the Ethics Helpline gives you the option of making a report without giving your name. Every report made to the Ethics Helpline is investigated.

Q. What if I'm worried about retaliation?

A. Retaliation is not tolerated.

If you raise a concern or report misconduct, you are doing the right thing. DT Midstream will not tolerate retaliation against any employee who, in good faith, brings forward a compliance or ethical issue.

Our company takes claims of retaliation seriously. We'll investigate and take action, if appropriate. Anyone found responsible for retaliation against an employee who reports suspected misconduct or other risks to the business is subject to disciplinary action, up to and including termination of employment.

If you suspect that you or someone you know has been retaliated against for raising a compliance or ethical issue, contact your supervisor, Human Resources, the Ethics and Compliance Office or call the Ethics Helpline.

Our Workplace

At DT Midstream, we want a workplace where the health and safety of our employees is a top priority and all employees feel valued for their ideas and perspectives. Working together as a team – embracing our unique differences in thinking, background, talent and life experience – gives us the greatest opportunity for success in serving each other, our customers and the community.

Health and Safety on the Job

We believe that incidents that cause injury or illness are preventable. We embrace the principle of *200 percent accountability*: “I am 100 percent responsible for my own safety and 100 percent responsible for the safety of those around me – because I care about my own family, my colleagues and their families, and the people in our communities.”

Ensuring a safe work environment means that everyone is responsible for identifying, reporting, evaluating and controlling workplace hazards to reduce risk, as well as complying with all applicable laws and regulations in performing work tasks. There is no task that is so urgent that we cannot take the time to perform it safely.

Our commitment to 200 percent accountability includes actions like:

- Being open to feedback from others if they provide coaching to you on health and safety practices.
- Saying something to leaders when we identify procedures that aren’t consistent with our safety policies.
- Reporting all near-misses and injuries, no matter how minor, so we can determine the root cause and learn how to avoid recurrences.
- Taking prompt action to control unsafe conditions or practices or escalating the issue to a leader.
- Having the courage to speak up to remind other employees, contractors and visitors of our health and safety practices, when necessary.

As part of our commitment to safety, DT Midstream cooperates with government reviews of our company facilities and operations and has procedures in place to guide employees and leaders with these reviews. If a government official requests your help with a review, contact your safety representative immediately.

What’s in bounds?	What’s out of bounds?
<ul style="list-style-type: none"> • Following all safety policies and procedures for the use of tools, equipment and working environments. • Using all personal protective equipment (PPE) as required for the work. • Following all safety laws and company standards regarding safe work practices. • Actively participating in our safety training programs and applying the knowledge gained through training both on and off the job. 	<ul style="list-style-type: none"> • Taking shortcuts without consideration for safety procedures and precautions. • Being distracted by personal issues and letting safety slip. • Not addressing or reporting a hazard or incident (e.g., “I don’t have to clean up that spill; someone else will take care of it”).

Public Safety

Operating our business in a manner that keeps communities safe is essential. We regularly engage with our neighbors and public officials to keep them informed of our processes and the actions we take to maintain safe operations.

Employee, Contractor and Visitor Identification

Employees and contractors are required to wear company identification at all times while on duty, unless prevented by safety considerations. That includes when you’re performing services at other companies or on customer premises, unless specifically exempted by management.

Visitors who are not authorized to be on company premises must have approval to be there. Any person with a permanent DT Midstream photo ID badge who is authorized can approve visitor entry for the areas where they themselves are permitted. Visitors will be provided with a visitor badge or other identification which must be prominently displayed and returned upon exit.

<p>What's in bounds?</p> <ul style="list-style-type: none"> • Always wearing your company ID while on duty. • Promptly reporting a lost or stolen ID. 	<p>What's out of bounds?</p> <ul style="list-style-type: none"> • Loaning your company ID to another person. • Using your ID to grant someone without ID or authorization to enter a company facility.
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Fitness for Duty

DT Midstream is committed to protecting the health and safety of its employees and the public. In order to provide a safe working environment, employees must be able to perform their job duties in a safe, secure, productive and effective manner. Employees who are not fit for duty may present a safety hazard to themselves or others. You are always expected to report to work fit for duty, and to remain fit while on duty. This means:

- You may not use, possess, sell, distribute or be under the influence of illegal drugs on company property or while conducting DT Midstream business, whether on or off company property.
- You may not use, possess, sell, distribute or be under the influence of alcohol while conducting DT Midstream business or while on company property.
- Where company business is conducted in conjunction with an after-hours social function, alcohol consumption in moderation is permissible if it is limited and does not violate other legal requirements. Alcoholic beverages may be served on company property at after-hours company events with approval from an appropriate company officer.
- Drug and alcohol testing are required for employees involved in a work-related accident, employees who exhibit signs of substance abuse or aberrant behavior, and employees who are involved in an incident resulting in damage to company property. Some employees are also required to undergo random or periodic testing related to drug and alcohol program requirements for their specific jobs.

<p>What's in bounds?</p> <ul style="list-style-type: none"> • Notifying Human Resources or designated medical personnel if you're taking prescription drugs or over-the-counter medications that you reasonably believe could affect your ability to work safely or efficiently. • Knowing and following fitness for duty guidelines. 	<p>What's out of bounds?</p> <ul style="list-style-type: none"> • Using, possessing, selling, offering to sell, providing, sharing or purchasing illegal drugs while on duty or on company property. • Being on company property or conducting company business under the influence of alcohol or medication.
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No Smoking Policy

Smoking is strictly prohibited in and on all DT Midstream properties. This applies to all employees and any individuals visiting and/or working in DT Midstream buildings and/or in vehicles the company owns or leases. Company worksites in jurisdictions that have more stringent no-smoking laws or ordinances may adopt additional guidelines to comply with state and local legal requirements.

Vehicle Safety

Employees who operate company vehicles or use their own vehicles while on company business must follow all federal, state and local laws, as well as DT Midstream safety policies, procedures and standards.

They must also, at all times, hold a valid driver's license that is not revoked or suspended in any state. And depending upon the vehicle or equipment being used, employees must have special license endorsements that may be required, such as a chauffeur or commercial driver license.

Driving in an unsafe manner or while distracted is strictly prohibited. This includes:

- Reading, typing or sending text messages or emails while driving any vehicle at any time even if the subject is related to company business or if using a company device.
- Using cell phones – even hands-free – while operating off-road or industrial equipment.

Employees are responsible for citations, fines and charges received while operating a personal or company vehicle while on company business.

<p>What's in bounds?</p> <ul style="list-style-type: none"> • Wearing a seatbelt and making sure passengers are, too. • Unless driving industrial or off-road equipment, using hands-free technology to make or receive calls where permitted by law. • Immediately notifying your leader if you are involved in an accident or receive citations while operating a company vehicle. 	<p>What's out of bounds?</p> <ul style="list-style-type: none"> • Transporting non-DT Midstream employees, such as family members, in a company vehicle. • Using a company vehicle for personal use, such as towing a boat or moving furniture.
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Terminable Offenses

The following list of violations (not all inclusive) will likely result in termination, even on the first offense:

- Creating, displaying or using hate group words or symbols while on company business or company property
- Unauthorized possession of firearms or other weapons on company business or company property
- Physical assaults
- Willful safety violations
- Possession, sale, use, manufacture or distribution of illegal drugs on company business or company property
- Being involved in an occupational accident or unsafe work act while unfit for duty, including vehicle accidents while driving a company vehicle, either on or off duty
- Theft of company, employee or customer property, including theft of company funds through falsifying pay or business expense records
- Absent, no report, three consecutive days
- Willfully, materially misstating financial statements

Workplace Violence

There is no place for workplace violence at DT Midstream.

- To help ensure a safe and secure workplace, the company reserves the right to search persons, parcels, vehicles and any company property at any time—including property located off-premises.
- Building security or local law enforcement will respond to and investigate reports of workplace violence. Criminal prosecution may be pursued, where appropriate.
- The use or possession of weapons or explosives anywhere on company property, in company vehicles or while conducting company business is strictly prohibited, even if you have a permit or license to carry them and even if they are locked in a trunk or otherwise secured. Only the chief operating officer can authorize exceptions.

Report any concerns about security in the workplace to your leader or the chief operating officer.

<p>What's in bounds?</p> <ul style="list-style-type: none"> • To help ensure a hostility-free work environment, reporting any potential or actual physical threat of harm to you or others. 	<p>What's out of bounds?</p> <ul style="list-style-type: none"> • Threatening or referencing physical harm or violence—even if you feel you have a good reason to be angry. And even if you claim later you “weren’t really serious” about following through on your threat. • Using tools, supplies or anything else in a manner that implies it is a weapon. • Shoving, punching or other hostile physical contact.
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Nondiscrimination and Equal Opportunity

DT Midstream is committed to having a workplace free of discrimination and that promotes equal opportunity.

It is DT Midstream policy to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, sex, age, religion, disability, national origin, citizenship, height, weight, genetic information, marital status, pregnancy, sexual orientation, gender identity, protected veteran status, or any other status protected by law. Our company prohibits and will not tolerate any such discrimination or harassment. Additionally, DT Midstream promotes the full realization of equal employment opportunity for minorities, women, persons with disabilities and veterans through Affirmative Action programs.

Q: One of my employees came to me with an accusation of discrimination that I'm certain is false. What are my responsibilities?

A: As a leader of the company, you need to bring this issue to Human Resources or the Ethics and Compliance Office. It is not your role to determine the validity of a discrimination complaint

Harassment

Harassment based on race, color, sex, age, religion, disability, national origin, citizenship, height, weight, genetic information, marital status, pregnancy, sexual orientation, gender identity, protected veteran status, or any other status protected by law is also discrimination. Conduct that creates an abusive or hostile working environment is also prohibited. Harassment simply has no place here.

Sexual harassment is misconduct that deprives employees of a workplace free from unwanted and unwelcome sexual overtones. It may include unwelcome sexual advances, requests for sexual favors or other verbal or physical contact of a sexual nature, including quid pro quo where some form of benefit such as a promotion is received in trade for sexual favors. Such conduct can create an offensive, hostile and intimidating working environment, and prevents individuals from effectively performing the duties of their position.

Examples of prohibited conduct that may create a hostile working environment also include:

- Inappropriate touching
- Derogatory comments, name-calling or continual taunting based on a protected group
- Conduct that is physically threatening, harmful or humiliating
- Taking advantage of employees with physical or mental disabilities, such as encouraging inappropriate behavior
- Offensive jokes, drawings, photographs, etc.

Sometimes an action that is not intended to be discriminatory or harassing can nevertheless be viewed or perceived by the other person, employee or guest in a different way and thereby becomes a problem.

The best rule of conduct is simple: "Treat everyone the same way you expect and want to be treated."

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Recruiting, selecting and compensating based on merit, experience and work-related criteria.• Treating others with respect and dignity any time and any place you represent the company.• Thinking carefully before making jokes that may unintentionally offend others.• Reporting any perceived bias based on differences protected by law or company policy.	<ul style="list-style-type: none">• Unwanted physical contact (e.g., a "friendly" neck massage).• Offensive comments about an individual's appearance, ethnicity or sexual orientation.• Inappropriate, sexually explicit or offensive jokes (even if you think you are just sharing them among friends).• Possessing, displaying or distributing offensive materials, such as cartoons, pictures, graffiti, paraphernalia or pornographic materials.

Investigations

DT Midstream investigates all reported allegations of harassment, discrimination or retaliation. We expect individuals involved in these investigations to provide their full cooperation. Our company maintains confidentiality throughout the investigation process to the extent possible and consistent with the need to responsibly address these types of allegations and take corrective action.

DT Midstream prohibits retaliation against any individual who, in good faith, reports discrimination or harassment, or any individual who participates in, or otherwise supports, an investigation of such reports. Anyone who exhibits retaliatory behavior against an individual under such circumstances will be subject to disciplinary action up to and including termination.

Employee Privacy

Personal Information

DT Midstream collects and retains personal employee information as needed to support functions such as benefits, compensation and payroll. The company is committed to protecting private personal information and using it only for legitimate business purposes. Access to records containing personal information is limited to personnel who have appropriate authorization and a clear business need for that information. *If you have access to personal information, you must treat it appropriately.*

Use of Company Communications Systems and Property

When it comes to use of company resources for personal communications, we must balance employee privacy with the need to maintain a safe and efficient work environment. For that reason, the company reserves the right to lawfully monitor its assets and work environments.

This means that even though limited personal use of company electronic information and communications systems is permitted, we should not assume that use of a company computer or other communications in the workplace — such as telephone calls, voicemail, email and internet use — will be private.

This also means that the company retains the right to lawfully search any company property at any time (e.g., offices, desks, lockers, vehicles, etc.), including company property located off-premises. The company also retains the right to search persons, parcels and vehicles on company property.

DT Midstream is not normally concerned with conduct off the job, unless it impairs an employee's performance on the job, or affects the company's reputation or business interests.

Q: If I am allowed to send personal email from my company computer, why would the company invade my privacy and look at it?

A: We don't just read everyone's email all the time; however, the company can and does monitor for inappropriate use (e.g., sending hate mail or pornography) or to investigate misconduct. For that reason, you should not have an expectation of privacy. If you need to send a personal email that you really want to keep private, it's best to send it from home or using your personal device.

For our company to be successful, we all need to do our part. We can start by being accountable for our actions—from keeping accurate records to avoiding conflicts of interest, to protecting private information and assets. Some of this accountability may seem like minor detail, while other issues seem significant. Whether big or small, all of it is important to our success.

Keeping Records Right

Keeping complete, accurate and honest company records is serious business. Failing to keep good records may result in fines and penalties and even damage our business and reputation.

We define company records as *all data and knowledge purchased, produced, acquired, reported, or otherwise used by the company*. These records might be in computer files, on paper or on other media. Some examples include:

- Reports
- Timesheets
- Invoices
- Payroll and service records
- Regulatory reports
- Financial information
- Customer proprietary information
- Proprietary data or confidential information
- Engineering design documents
- Measurement or performance records
- Other essential data

What's in bounds?

- Being honest and careful in keeping accurate records.
- Promptly correcting errors.
- Protecting company information and keeping it confidential.
- Complying with legal, company, and accounting requirements.
- Following the record retention schedule for your organization.

What's out of bounds?

- Changing or destroying records without proper authorization.
- Thinking accurate record keeping is a low priority.
- Willfully, materially misstating financial statements.
- Approving your own expenses.

Q: When I complete a project, can I throw out all the documentation?

A: First check the company's record retention schedule. Retention guidelines differ depending on the record type and there could be a legal reason to hang on to the documentation. Contact Legal for assistance.

Understanding Conflicts of Interest

What's a conflict of interest? It's when your private interests interfere...or even appear to interfere...with the interests of the company. A conflict of interest occurs when you have difficulty performing your work objectively and effectively due to the influence of your personal interests. This could happen in your personal interests or relationships, outside activities or financial transactions.

Personal Relationships

Our company recognizes and respects the rights of employees to associate and form personal relationships with those they encounter in the work environment. However, sometimes our personal relationships can lead to a conflict of interest when those close to us become involved, directly or indirectly, in our work responsibilities. Instances in which a dating, sexual, romantic or other personal relationship exists between employees, or between employees, contractors or other individuals in our workplace have the potential to negatively affect the work environment. That’s why we can’t have family members or personal friends reporting to each other where one has influence over work assignments, performance evaluations, compensation or hiring decisions. This also extends to family members or personal friends who have outside businesses or conduct transactions with the company. If you find yourself in any of these situations, you should immediately disclose it to Human Resources to ensure that any potential conflict of interest can be avoided.

Your brother is part owner of a firm that does work with DT Midstream in an area where you have some oversight responsibilities. A conflict of interest? Yes, because a conflict of interest may exist not only due to your work responsibilities, but also from the interests of your family members. Remember, appearances do matter.

Outside Activities

Being involved in outside activities is a good way to energize our lives. However, some situations could create a potential conflict of interest. And that is why we should avoid conversations or interactions with external parties that could be perceived as providing preferential treatment or a personal benefit. It is always wise to check with a leader first.

If you hold a public office, either elected or appointed, or are a board member of another organization, it may be appropriate to be involved in discussions that involve DT Midstream or its competitors because of your expertise. But it is not appropriate to participate in the voting or decision-making processes. This also pertains to when you own or are employed by an outside business. When these situations happen, you should disclose the potential conflict to your leader or the Ethics and Compliance Office and remove yourself from any decisions or agreements.

Financial Interests

DT Midstream’s business cannot be bought. Likewise, acting with integrity means that we do not buy others’ business. This is why we should never offer or accept personal loans or other guarantees, preferences or discounts that are not widely offered to others for business. Not only could this be illegal, but it also is a conflict of interest. Additionally, we should never use company funds to make charitable contributions, political contributions or support political organizations except where permitted by law and supported by company policy.

What’s in bounds?	What’s out of bounds?
<ul style="list-style-type: none">• Receiving approval from your leader before serving as a director, manager, or member of a board or committee of any business where there may appear to be a conflict of interest.• Separating your personal and company interests to eliminate the appearance of or actual conflict of interest.• Owning or investing in a business that is not a competitor, supplier, or other business partner to DT Midstream.• Using company information only for its intended business use.• Disclosing to Human Resources that you supervise or report to a person with whom you have a close personal relationship.	<ul style="list-style-type: none">• Involving yourself, directly or indirectly, with a company transaction or contract that involves someone with whom you have a close personal relationship.• Misrepresenting yourself as a DT Midstream employee when performing outside work.• Using company resources for outside activities without appropriate leader approval.• Soliciting personal business on company time or using company resources for personal business.• Giving to, or receiving from supplier, business partners or customers, cash or cash equivalents in any amount.

How to Handle Questions or Concerns

If you believe you might have a conflict of interest, notify your leader. Your leader will be able to provide guidance on your situation or suggest appropriate steps, which may include completing a conflict-of-interest disclosure form or contacting the Ethics and Compliance Office directly.

Policies

- [Hiring, Movement and Separation of Employees](#)
- [Officers Code of Business Conduct and Ethics](#)

Proper Use of Assets

We all play an important role in managing the company’s assets. The protection and proper use of these resources help keep costs in line. Company assets include things like computer resources, money, time, inventory, facilities, equipment and tools.

DT Midstream empowers employees with the authority to use company resources necessary to perform their jobs (in accordance with company policies).

If you have questions or concerns, talk to your leader or contact the Ethics and Compliance Office or the Ethics Helpline at 855.222.0671 or www.lighthouse-services.com/dtmidstream.

<p>What’s in bounds?</p> <ul style="list-style-type: none">• Spending money only when authorized and for legitimate business needs.• Using work time productively and being on the job when scheduled.• Taking care of company property and only disposing of it when authorized and in accordance with procedures.• Asking your leader for approval to use company assets for personal or outside activities.	<p>What’s out of bounds?</p> <ul style="list-style-type: none">• Theft of company, employee or customer property, including theft of scrap or salvage materials.• Theft of company funds through falsifying pay or business expense records.• Operating a personal business with company resources.
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Intellectual Property and Proprietary Information

To continuously improve, we need to be creative in developing new ideas and products. And we need to protect these ideas, so we don’t risk losing the advantages associated with our intellectual property and proprietary information.

Advise your leader of any inventions or other creative works developed in your job so we can obtain proper legal protection for DT Midstream property. Some examples of intellectual property we want to protect from disclosure are unpatented technology, trade secrets, trademarks, technology, artwork and other forms of graphics.

Like intellectual property, proprietary information plays a key role in our business, so it is important to protect it from unauthorized disclosure or use. Proprietary information is owned or controlled by DT Midstream and provides economic value; however, it also has value to our competitors and other third parties. If inappropriately released, it could have a negative impact on our company. Some examples of proprietary information include customer and employee information, business and marketing plans, and financial and operating data.

Information Security

Information is one of the most important tools we have to do our jobs. Our information systems put the data we need at our fingertips – from customer contracts to personnel files to real-time safety reports and much more. It's all information we need to protect. But unfortunately, there is always risk of those who try to crack into companies' information systems for malicious purposes. That's why we must all be vigilant and do our part to keep our systems secure. That includes:

- Never sharing your passwords with anyone.
- Choosing complicated passwords that can't be easily guessed.
- Reporting any actual or suspected violations of information security policy to your leader or our Information Technology team.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Obtaining confidentiality and non-disclosure agreements from potential suppliers, consultants, etc., where appropriate.• Advising your leader of intellectual property developed while working for the company.• Respecting the intellectual property and proprietary information rights of others, including our suppliers and competitors.	<ul style="list-style-type: none">• Distributing intellectual property or proprietary information to third parties without proper authorization.• Using intellectual property or proprietary information for nonbusiness related matters, or without proper authorization.• Copying, distributing or modifying third-party copyrighted materials, documents or computer programs without permission.• Taking intellectual property or proprietary information with you if you leave the company.

Q: I have a personal social media site that I use to blog about things happening in the community, of which DT Midstream is a part. I want to display our company logo on my site. Is the use of the logo permitted?

A: No. All logos representing DT Midstream may only be used on official company sites, documents or sponsorships.

Q: I often give presentations at conferences sponsored by professional organizations to which I belong. Should I be concerned about proprietary information? How should I approach this?

A: You should be sensitive about DT Midstream information you plan to share. Review it with your leader and check to see if Corporate Communications wants to review the presentation. While knowledge sharing is encouraged, if the information is confidential, or if it could be used by others in securing a business advantage over DT Midstream, the information should not be shared.

Government and Compliance

We value our relationships with government and regulatory personnel and recognize they are important to our continued success. To sustain and continue to build upon these relationships, it's critical that we avoid the appearance of any impropriety when dealing with government or regulatory agencies, officials or employees. If we don't, both parties could be subject to fines and penalties and our good reputation will be tarnished.

In addition, as DT Midstream employees, we all must commit to complying with relevant laws, rules and regulations. To do so, it's helpful to understand both "*why*" we're doing something and "*how*" to do it. Getting clear on both the "why" and "how" helps us understand the particular requirements of the laws and regulations that we must fulfill as part of doing business. When we're in compliance, the community, our customers and our shareholders can feel confident that they are involved with a company that demonstrates integrity, and compliance with laws, rules and regulations in everything we do.

<p>What's in bounds?</p> <ul style="list-style-type: none"> • Testifying in a legal or regulatory proceeding truthfully and based on facts. • Complying with all federal, state and local laws and regulations. • Cooperating with government and regulatory officials in reviews of company facilities or operations 	<p>What's out of bounds?</p> <ul style="list-style-type: none"> • Giving government employees, public officials or members of a public or government official's immediate family gifts, bribes or any preferential treatment for business transactions or policy decisions. • Failing to report a potential incident or activity that does not comply with an applicable law or regulation. • Misrepresenting facts or data on government or regulatory reports.
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If you are approached or contacted by a government or regulatory official, ask for their contact information and the purpose of the call or visit. Let them know you'll have a representative of the appropriate area of the company talk with them. There are a number of departments that are key in assisting with these issues. Please reach out to one of the following groups as soon as you are approached or contacted.

- Corporate and Government Affairs
- Legal
- Ethics and Compliance Office
- Corporate Safety
- Environmental



We believe we have a responsibility to make a positive difference in the communities where we operate. We do that through our philanthropic giving, employee volunteerism, environmental commitments, and the expectation that we will always treat everyone with respect.

Customers

Every employee has a role to play as an ambassador to our customers. Challenge yourself and ask, "If I could view my work from the customer's standpoint, would I be proud of the way that I'm doing it?" We have a responsibility not only to deliver service safely and efficiently, but also in a way that demonstrates our commitment to service excellence. Inevitably, we'll have tough interactions with some of our customers, which will put us to the test. And that's when it's most important to put ourselves in their shoes and see the interaction through their eyes.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Interacting with customers in an engaging and respectful manner.• Responding timely to customer calls and inquiries• Respecting and maintaining customers' privacy and trust.	<ul style="list-style-type: none">• Missing appointments or deliverables with customers.• Being dishonest in any way in customer interactions.• Disclosing confidential customer information without an authorized business or emergency purpose for doing so.

Environment

We are committed to minimizing our impact on the environment and developing cleaner ways to produce energy. This commitment to environmental stewardship includes operating our facilities and equipment in a manner that complies with government standards and protects our employees and surrounding communities.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Reporting incidents that may create a threat to the environment.• Cooperating with government and regulatory officials regarding environmental inquiries or inspections, and notifying our environmental group, legal, or a local person authorized to deal with these matters.• Identifying and weighing environmental risks when making decisions.	<ul style="list-style-type: none">• Not reporting a potentially hazardous spill since you cleaned it up yourself.• Ignoring environmental procedures when using equipment or performing business operations.• Misrepresenting the occurrence or severity of an environmental incident.

Q: My work is always 100 percent compliant with all environmental regulations and permits. What other environmental expectations should I be aware of?

A: While compliance with regulations and specific permits is our first priority, we are committed to going beyond compliance where practical. There may be additional specifications related to special environmental designations (ISO 14001 certifications, for example). And you should always look for opportunities to be environmentally friendly, such as reducing energy or water use and increasing recycling.

Corporate Citizenship

We believe our success at DT Midstream is dependent upon modeling good corporate citizenship, especially in the communities where we live, work and operate. That's one reason we work hard to be a good corporate citizen, which includes providing charitable contributions and participating in events and volunteerism that support our communities.

Charitable Contributions

DT Midstream's Corporate and Government Affairs director is charged with managing corporate donations and contributions of company resources. Employees are highly encouraged to recommend organizations for corporate contributions or support but should follow company policy and procedures for requesting, committing or making any donations or contributions, including in-kind services.

Community Involvement

DT Midstream employees are active community volunteers and work to address a wide range of community needs. Our company actively supports, organizes and participates in community volunteering events and activities. Unless an employee is participating in a company sponsored volunteering event or program, employees are expected to conduct volunteer activities on their own time unless given approval by their leader to do otherwise. To support an employee's interest in volunteering, the Corporate Contributions Committee provides matching gift and other non-profit funding programs to help encourage volunteering.

Political Contributions

We hope that our employees take an active interest in the political process. We support employees' freedom to make personal contributions to candidates or political organizations and participate in legal activities that reflect their individual choices.

Employees are not permitted to make a corporate commitment of company resources or funds without the approval of the DT Midstream's chief administrative officer. The company will not reimburse any employee for a political contribution or expenditure.

Our company participates in the political process to support the interests of our employees, customers and shareholders and administers a political action committee (PAC). The DT Midstream PAC accepts voluntary contributions from qualified employees who wish to participate in the political process in a way that supports DT Midstream. Your choice to participate (or not) in our PAC will have no impact on the terms and conditions of your employment. If you have questions about joining the DT Midstream PAC, contact Government Affairs.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Using a volunteer opportunity as a group team building activity with leader approval.• Approaching the Corporate Contributions Committee to request a corporate charitable contribution to a non-profit whose mission is consistent with company community involvement priorities.• Making sure any cash or non-cash company donation is properly authorized before promising it to a charity.	<ul style="list-style-type: none">• Conducting volunteer activities during business hours, unless given approval by your leader.• Donating company funds or resources of any kind to any political party, candidate or campaign without authorization.• Using company funds, time, equipment, supplies or facilities when making personal political contributions.• Giving the appearance of speaking on behalf of DT Midstream when talking about public issues, without specific authorization to do so.

Suppliers, Vendors and Business Partners

Giving and receiving entertainment, gifts and gratuities

The exchange of small business courtesies, such as a modest meal, is a common practice that can help to form and build business relationships. But we need to be careful that receiving these small courtesies doesn't sway our decisions, or even give the appearance of swaying our decisions, about what we buy or who our business partners are.

We should only accept gifts or other gratuities on an infrequent basis and are of minimal value (\$75 or less), and entertainment where the value is reasonable for the activity (i.e., sporting events, golf, theater, concerts). They can only be accepted in the normal course of an existing business relationship and can't be meant to improperly influence our decisions. Before you accept any entertainment, gifts or gratuities from someone who supplies products or services to DT Midstream, it's a good idea to let them know about our policies to ensure a clear understanding.

The flipside is just as important: We need to steer clear of using entertainment, gifts or gratuities to try to sway the decisions of our customers, suppliers, regulators, business partners or anyone else. In fact, improper gifts may be considered bribery, which violates the law. So before offering any entertainment, gifts or gratuities, it's important to know and abide by customers' and government officials' policies. That demonstrates integrity and keeps us in line with our values.

If you are offered or given entertainment, gifts or gratuities you think might be outside the lines, report it to your leader. If it is a gift, politely return it with an explanation that company standards don't permit you to accept it. If it cannot be returned, consider donating it or including it in a raffle for a company sponsored charitable organization. If the gift contains perishable food, share it with co-workers or donate it to a charitable food center.

If you have questions, contact the Ethics and Compliance Office, the Ethics Helpline at 855-222-0671 or www.lighthouse-services.com/dtmidstream, or Supply Chain Management.

<p>What's in bounds?</p> <ul style="list-style-type: none">• Seeking guidance from your leader and disclosing the offer or receipt of gifts or entertainment from our business partners that may be questionable or not conform to our policy.• Communicating our policies regarding business courtesies to our suppliers and vendors.• Giving or receiving infrequent, moderate gifts or hospitality as part of a vendor relationship, including meals, charity events, sporting events or other celebrations, gift baskets, flowers, books, plays, concerts or other cultural events.• Partnering with suppliers and vendors who exhibit behaviors consistent with our core values and diversity and inclusion principles.• Avoiding unnecessary contact or receipt or offer of gifts or entertainment with suppliers who are currently involved in the bid process.	<p>What's out of bounds?</p> <ul style="list-style-type: none">• Soliciting any entertainment, gifts or gratuities from anyone with whom we do business.• Accepting or offering entertainment, gifts or gratuities that could influence, or be perceived to influence, our purchasing or contracting decisions.• Participating in gambling or sexually explicit entertainment.• Giving or receiving money, gift cards or other cash equivalents, loans, special privileges, personal favors, benefits, services or any other favor that may be considered a bribe or kickback.
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<p>Q: One of my suppliers has invited me and my team to lunch to discuss product quality issues and their resolution. Who pays for this lunch?</p> <p>A: It's acceptable for a supplier with whom we have an established business relationship to pay. It would not be acceptable, however, for you to ask the supplier to take you to lunch or to pay.</p> <p>Q: I have been working with the same vendor for two years. The vendor has invited me to a baseball game. They say not to worry because they had the extra ticket. Can I attend?</p> <p>A: It depends. Check with your leader. You should consider the value of the ticket as well as if the vendor's contract may be coming up for bid soon and the role you play in the selection. If there could be a perceived degree of influence, you should politely decline the invitation.</p>



Our Market

The bottom line is that we compete in the market based upon the merits of our products and services, maintaining the trust of our shareholders, and by building and protecting our reputation. This includes being honest and responsible when dealing with material non-public information and using common sense and good judgment when engaging in external company communications. We do these things not only because they are legally required, but because it's the right thing to do.

Insider Trading

Among many other things, operating with integrity means that we must never use inside information for personal gain. Inside information is *material non-public information that could influence an investor's decision to buy, sell or otherwise trade securities of the relevant company*.

Examples of what could be considered material non-public information include:

- Judicial or regulatory decisions
- Dividend declarations
- Plans to issue or buy back securities
- Financial statements
- Earnings announcements
- Pending acquisitions or mergers
- Joint venture and contract negotiations
- Potential DT Midstream transactions with other companies

Federal law and Securities and Exchange Commission (SEC) regulations make it illegal to buy or sell securities based on inside information. Inappropriately using or sharing inside information undermines trust and can lead to criminal prosecution, including prison. Keep inside information inside.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Protecting company inside information from those who do not have a need to know.• Trading in the securities of DT Midstream only after confidential information has been released to the public.• Adhering to SEC regulations and company policy for buying/selling DT Midstream stock.	<ul style="list-style-type: none">• Discussing inside information in public places or with family members or friends.• Using or sharing inside information for personal gain.

Q: Due to my job responsibilities, I often have access to earnings information before it is released. If someone asks me how the numbers look before the SEC filing, is it OK to provide them a general indication of the earnings?

A: No. Any type of disclosure of material non-public information including estimates or other types of tipoffs is prohibited. Material non-public information should only be discussed among employees who have a need to know in order to complete their job responsibilities and who understand the insider trading rules.

Q: My family and friends sometimes ask me how DT Midstream is doing and if they should buy our stock. I feel the company is doing well and I am proud to work for DT Midstream, so I recommend that they buy it. Is this a problem?

A: As long as you don't share material inside information, or make your recommendation based on other non-public information or tips, it should not be a problem.

How to Handle Questions or Concerns

Talk to your leader, Legal or the Ethics and Compliance Office if you are unsure whether something qualifies as inside information.

Fair Competition

Our competitive strategies and activities are governed by federal and state laws, rules, policies and regulations.

It is common practice, and completely proper, to gather information about the marketplace in which we compete, including information about our competitors' products and services. In doing this, however, we never cheat or attempt to acquire a competitor's trade secrets or other proprietary information through unlawful means, including theft, spying, misrepresentation, omission or a breach of a competitor's non-disclosure agreement by a customer or other party.

Consistent with our commitment to integrity, we always compete fairly, ethically and lawfully.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Understanding and complying with government regulations and policies regarding competitive practices, including antitrust.• Safeguarding competitors' confidential information from others who could improperly benefit.• Representing accurately and truthfully the quality, performance, features and availability of products and services in conversations, advertising and other public communications.	<ul style="list-style-type: none">• Directly or indirectly discussing, agreeing or contracting with competitors to restrict competition. Some practices that restrict competition include fixing prices, allocating markets or dividing up customers.• Engaging in industrial espionage, sabotage or bribery.• Misrepresenting our identities or allowing outside entities we work with to misrepresent themselves, when gathering competitive information.• Providing preferential treatment to DT Midstream affiliates or other business partners to influence the market.

Company Communications

What we do has a big impact on our reputation. But what we say has consequences as well.

Media Inquiries

Customers, shareholders, regulators and the general public count on DT Midstream to provide accurate and reliable information about our operations. In an age when information can be disseminated widely and instantaneously, it is important that our communications with external audiences are truthful, timely, and compliant with legal and regulatory requirements. For this reason, it is important that only authorized persons communicate publicly on behalf of the company.

The rest of us must be careful not to make public statements on behalf of the company unless we have permission to do so. If you receive a request from a member of the media for information or comment, don't attempt to answer it yourself. Instead, you should direct all media requests to DT Midstream's Corporate and Government Affairs director and/or the 24/7 DT Midstream Media Relations line 313.774.0690.

Q: A reporter approached me in the field and asked me to comment on our environmental priorities. It was a great opportunity for me to share the great work we are doing, but I didn't think I should say anything.

A: Your instincts were right. Unless you are an authorized representative, you should not speak on behalf of the Company. Send the reporter to our director of Corporate and Government Affairs and/or our 24/7 DT Midstream Media Relations line: 313.774.0690.

Speaking Engagements and Publications

You should seek approval from your leader and DT Midstream's director of Corporate and Government Affairs before you make presentations, give speeches or submit articles to external publications that relate to DT Midstream's operations or business interests—unless you are authorized to do so as part of your job. And without prior approval, you should not suggest you are speaking on behalf of DT Midstream when presenting your personal views at professional or community functions. You should also keep in mind that use of the company brand and logo must adhere to approved specifications. Guidance on proper use of DT Midstream branding can be found on our company intranet under Work Resources.

Q: I have been asked to make a presentation at a trade association meeting. Is this okay?

A: Yes, but if the presentation involves your work at DT Midstream, it requires approval by your leader, and DT Midstream's director of Corporate and Government Affairs. You should also be sensitive to issues related to information security and the protection of our assets.

Photography and Videography

Taking photos or videos while on company property is permitted, but subject to these and other requirements:

- They must be used exclusively for personal or job-related purposes, such as, an employee celebration or documenting images for a project.
- Employees/contractors included in the photos or videos do not object to their inclusion.
- Taking the photos or videos does not interfere with safety or company operations.

Social Media

If you are not an authorized DT Midstream spokesperson, the company understands that you may still want to talk about DT Midstream in social media, when using social media sites to find new professional connections, update your profiles, or share news about your life with friends and family. However, participating in social media activity that relates to DT Midstream carries certain responsibilities, even if done off duty and outside of the workplace.

If you're using social media, the best advice is to approach the online world in the same way you do the physical one. Use common sense. No policy will adequately substitute for common sense and good judgment. The following are some guidelines* for using social media:

- Recognize that your social media activity relating to the company should be consistent with our Code of Conduct and any other relevant company policies and procedures.
- Always consider what you're saying before posting. If you wouldn't post it on the bulletin board in the office, or say it loudly at the lunch table, think twice before publishing it via a social network.
- Discriminatory or threatening comments made toward fellow employees in social media may be considered a violation of policy—just as if it happened in the workplace.
- Regardless of whether you access social media via our systems or yours, be sure to respect your obligation to protect confidential company information.
- If you comment online regarding any aspect of company business, make it clear that the views posted are your own and not those of DT Midstream.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Adhering to copyright laws.• Being respectful.• Being honest and accurate.• Getting approval from Corporate and Government Affairs before using DT Midstream's name or your connection with the company in any endorsements, testimonials or other promotional activities.	<ul style="list-style-type: none">• Representing in social media that you are authorized to speak on behalf DT Midstream without the prior approval of Corporate and Government Affairs.• Posting proprietary or security sensitive company information.• Posting personal, confidential information about customers or employees.• Using your DT Midstream email address as your screen name or email address in your personal use of social media.• Posting information that could negatively impact DT Midstream's reputation.• Posting discriminatory or harassing comments

**Nothing in these social media guidelines is designed to interfere with, restrain, or prevent employee communications regarding wages, hours or other terms and conditions of employment.*

Audit Committee

Concerns regarding financial statements, auditing, accounting practices or internal controls may be submitted to the Audit Committee through its reporting channel. Call 855.222.0671, visit www.lighthouse-services.com/dtmidstream or write:

DT Midstream
Audit Committee
500 Woodward Ave.
Suite 2900
Detroit, MI 48226

General Counsel and Corporate Secretary's Office

The General Counsel and Corporate Secretary is responsible for corporate governance matters, including the Board of Directors, our Code of Conduct, corporate policies and questions about the Securities and Exchange Commission. Call 313.774.3174 ext. 5 to report violations of our standards related to inside information or insider trading, or for questions about DT Midstream's Board of Directors or corporate policies.

To view corporate policies, visit the DT Midstream intranet and search "policies."

Ethics and Compliance Office

To report a concern or for inquiries related to DT Midstream's Code of Conduct, policies, compliance with laws or regulations or other related concerns, contact the Chief Ethics & Compliance Officer at 313.774.3174 ext. 3. You can also submit a confidential, and anonymous if preferred, report at 855.222.0671 or www.lighthouse-services.com/dtmidstream.

Environmental

Report spills of toxic or hazardous materials to the environmental group at your location or to Environmental Management and Resources at the 24-hour emergency contact number: 313.774.0701.

General Auditor

Contact the General Auditor to report concerns about financial statements, auditing, accounting practices or internal controls at 313.774.3174 ext. 5. You may also report your concerns to the Ethics and Compliance helpline at 855.222.0671 or file a report at www.lighthouse-services.com/dtmidstream.

Human Resources

Call Human Resources at 313.774.3174 ext. 2 for:

- Reporting alleged acts of discrimination or harassment
- Reporting suspected misconduct
- Reporting uncorrected personal safety hazards
- Questions about disciplinary actions

Call 313.774.0702 to request help from the Employee Assistance Program

Indemnification

At times the company may provide you with a defense and agree to indemnify you against liabilities incurred while carrying out your duties, provided you were acting in good faith and within the scope of your job responsibilities for the company.

Nothing contained in this handbook creates an express or implied contract of employment. The relationship between you and the company is referred to as "employment at will." This means that your employment can be terminated at any time for any reason, with or without cause, with or without notice, by you or by the company. No representative of the company has authority to enter into any agreement contrary to the foregoing "employment at will" relationship. For employees represented by a union, the employment relationship is as described in the applicable collective bargaining agreement.