

Anti-Bribery/Anti-Corruption

Revision 1

May 15, 2023

1. Applicability

This Policy applies to all employees of DT Midstream. This Policy also applies to contract personnel (defined as contractors, vendors, consultants, or any others performing work on behalf of DT Midstream) who have access to confidential or private information¹.

2. Policy

A. General

DT Midstream maintains an Anti-Bribery/Anti-Corruption Policy prohibiting any improper or unethical payment to government officials, vendors, contractors, non-profit organizations, or any privately owned organization. This policy also applies to family members or personal friends of those mentioned above. This Anti-Bribery Policy is designed to extend and comply with the requirements of the U.S. Foreign Corrupt Practices Act (the "FCPA"), and the anti-bribery laws of those other jurisdictions in which we do business. These laws generally prohibit bribes, kickbacks, or illegal payments to influence business transactions and require DT Midstream to maintain accurate books and records and a system of internal controls.

3. Content

A. General

1. No DT Midstream employee, contract personnel, or anyone acting on behalf of DT Midstream has the authority to offer, promise, give, or authorize payments of money or anything else of value, whether directly or indirectly, to a government official or to their family member or friend or a participant in a private commercial transaction to improperly induce that person to affect any act or decision, to do or omit to do any act in violation of their duty, or to secure an improper advantage in a manner that will assist DT Midstream, or any of its subsidiaries or divisions, or any of its employees, contract personnel, or anyone else to obtain or retain business ("Prohibited Payments").

¹ The applicability of these policy requirements to contractors, vendors, consultants, service providers, or any others performing work on behalf of DT Midstream should not be interpreted or construed to create or establish an employment relationship between DT Midstream or any DT Midstream subsidiary and its contractors, vendors, consultants, service providers, or their employees or agents.

2. Every DT Midstream employee and contract personnel has the obligation to record accurately and fairly all of their transactions involving any expense of DT Midstream or any other transaction involving the disposal or transfer of DT Midstream assets, including submitting and keeping accurate supporting documentation. In addition to direct payments of money, other examples of Prohibited payments include the following:
 - a. Excessive gifts, travel, meals, entertainment, or other hospitality expenses that are inconsistent with DTM's gifts, entertainment and other expenses noted in DTM's Code of Conduct made at the direction, or for the benefit of a government official or a commercial business partner, vendor, or contractor, or their family members or friends.
 - b. Contributions to any political party, campaign, candidate for office or party official employment, whether paid or unpaid (e.g., internships); or charitable contributions and sponsorships that do not comply with existing local, state, and federal regulations.

4. Sources

- A. DT Midstream Code of Conduct
- B. Signature Authority for Contracts and Financial Transactions
- C. Signature Authority Matrix
- D. Acceptable Business Expenses
- E. DT Midstream's Supplier Code of Conduct

Accountable Officer: Senior Vice President of Administration

Last Reviewed: May 15, 2023