

Zero Tolerance Policy

Revision 2

November 1, 2021

1. Applicability

The Zero Tolerance 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).¹

This policy supplements the principles of integrity and respect set forth in DT Midstream's Code of Conduct and is specifically supported in writing by our company's President and CEO in the Zero Tolerance Memo.

2. Policy

A. General

DT Midstream recognizes the basic human right of every individual to work in an environment free from threats, violence, harassment, sexual harassment, discrimination, and retaliation.

B. Definitions

1. **Discrimination** refers to unequal or unfair treatment of an individual or a group because of one or more characteristic protected by law, including race, color, sex, sexual orientation, gender identity, age, religion, disability, national origin, citizenship, height, weight, genetic information, marital status, pregnancy, and veteran status.
2. **Harassment** refers to any form of verbal, visual, or physical conduct that could create or contribute to an intimidating, offensive, hostile working environment, including stereotyped or demeaning remarks or gestures, display or circulation of materials offensive to a person's race, color, sex, sexual orientation, gender identity, age, religion, disability, national origin, citizenship, height, weight, genetic information, marital status, pregnancy, veteran status or other legally protected status.

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 and its contractors, vendors, consultants, service providers, or their employees or agents.*

3. **Sexual Harassment** specifically refers to any verbal, visual, or physical conduct of a sexual nature that could create or contribute to an intimidating, offensive, or hostile working environment, including unwelcome sexual advances or requests for sexual favors, or other behaviors that might reasonably be perceived as placing a condition of a sexual nature on employment or opportunity for training or promotion. Some examples of prohibited behaviors included:
 - a. Unwanted touching, patting, or leering
 - b. Sexual assault
 - c. Inquiries or comments about a person's sex life
 - d. Comments with sexual overtones
 - e. Gender-based insults or jokes causing embarrassment or humiliation
 - f. Repeated unwanted social or sexual invitations
 - g. Inappropriate focus/comments on a person's physical attributes or appearance

4. **Retaliation** refers to unwarranted negative action taken against an individual who, in good faith, makes a report of misconduct or who participates in an investigation.

C. Zero Tolerance

1. We have **zero tolerance** for discrimination or harassment – and will ensure that appropriate action is taken against anyone found to be responsible, up to and including termination.
 - a. Employees who violate this policy will be held accountable with appropriate corrective action, up to and including termination.
 - b. Others, such as contractors, vendors, consultants, service providers, or their employees or agents will be held accountable through contractual or working agreements.

2. Intentional racism, using racial slurs, promoting racially intolerant content or other discriminatory/harassing conduct – even when offsite, on personal time or on social media – will not be tolerated and will lead to termination.

3. Certain intolerable actions may be deemed so offensive and disruptive that the individual found responsible could be terminated immediately on the first offense.

4. Zero tolerance also applies to retaliation. Regardless of how an issue is reported or whether it is substantiated, retaliation against anyone who makes a good faith report or participates in an investigation will not be tolerated – and

appropriate action will be taken against anyone found to be responsible for retaliation, up to and including termination.

5. Leaders are held to a higher standard and may receive a higher level of discipline for discriminatory, harassing, or retaliatory behavior than an individual contributor.

D. Speak Up Culture

1. It is everyone's responsibility to speak up about violations of this policy. Employees, leaders, contractors, suppliers, customers, or other stakeholders who are aware of a violation of this policy should report their concern, anonymously if desired, through the Ethics Helpline (855.222.0671 or www.lighthouse-services.com available 24/7).
2. It is the company's responsibility to promptly investigate and appropriately resolve concerns raised, without retaliation.
3. Appropriate action will be taken based on the circumstances – and not all substantiated situations will warrant termination.

3. Sources

- A. DT Midstream Code of Conduct
- B. CEO Zero Tolerance Policy

Accountable Officer: Director of Human Resources

Last Reviewed: December 5, 2023