Ethics & Compliance Office

Standards for Service & Material Providers

EP ENERGY

Standards for Service & Material Providers[1]

EP Energy and its subsidiaries (collectively "EP Energy") expect their employees to act in accordance with the highest ethical and legal standards in their business activities. All of EP Energy's business activities are guided by its Code of Conduct, by its Values, and by applicable laws, rules and regulations.

We are committed to the following values:

- We act with integrity
- We pursue safety relentlessly
- We cultivate leadership
- We move with agility
- We excel through teamwork

As a provider of services or products to EP Energy, we expect you to interact with the company in a manner consistent with our Code of Conduct and our Values. To that end, we have prepared this brochure to describe EP Energy's minimum requirements of its providers. In particular, we want you to be aware of EP Energy's expectations related to:

- Conflicts of interest
- Compliance with applicable laws and regulations
- Fair competition and antitrust
- Insider trading
- Transacting international business
- Safety and environmental
- Employment practices
- Prohibited items including illegal drugs, alcohol and weapons
- Gifts and entertainment
- Accuracy of business records
- Confidential information and trade secrets
- Use of electronic media

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[1]A service or material provider ("provider") is defined as any contractor, consultant, supplier or vendor that provides services or materials to EP Energy in exchange for compensation.

EP Energy has an Ethics & Compliance Helpline, which gives our providers a way to raise ethics and compliance issues to EP Energy's attention in an anonymous way. The Helpline phone number is (855) 231-7507. Concerns can also be raised through the Helpline's anonymous web reporting tool at www.epenergyspeakup.ethicspoint.com. Providers may also send an e-mail message to ethics@epenergy.com. If the actions of EP Energy, another provider, your company, a subcontractor or other third party create an apparent risk, please notify EP Energy promptly.

Conflicts of Interest

EP Energy expects business decisions made on its behalf to be in the best interest of the company. Any situation that creates or appears to create a conflict between provider personal interests or those persons assigned to work for EP Energy by such providers and the interests of EP Energy must be avoided.

Providers and assigned personnel must disclose actual or potential conflicts of interest and discuss such conflicts with their designated EP Energy managers.

Compliance with Applicable Laws & Regulations

Providers are expected to comply with all applicable laws and regulations while on EP Energy premises or project sites. Providers are responsible for the actions of their employees and their subcontractors by ensuring that both are trained, fully informed and follow the laws, rules and regulations that are applicable to their job and location or project sites.

When requested, all necessary records must be available to EP Energy auditing representatives at a mutually agreed time and place.

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Fair Competition & Antitrust

Providers and assigned personnel representing EP Energy must comply with all applicable laws and regulations regarding fair competition and antitrust. These laws and regulations include unfair pricing practices, unfair marketing practices, or misrepresentation of the products and services of EP Energy or its competitors.

Insider Trading

Providers and assigned personnel must adhere to applicable United States securities laws regarding insider trading. You may receive material, non-public information from EP Energy suppliers, contractors and customers in the course of doing Company business. You must safeguard this information and never disclose it to anyone outside of EP Energy without the appropriate approvals or unless required to do so by law. You must not buy or sell securities of a publicly traded company while in the possession of material, nonpublic informa¬tion. In addition, you must ensure that your immediate family members comply with this policy. These restrictions apply to information about other companies that you may obtain while assigned to work for EP Energy.

Transacting International Business

All providers and assigned personnel representing EP Energy must abide by the national and local laws of the country in which they operate in accordance with applicable United States laws, and these standards. This includes, but is not limited to, immigration, customs, and tax or exchange control laws, regulations, and record keeping.

United States trade controls are embodied in various laws and regulations that affect international transactions, including the following: (1) the Foreign Corrupt Practices Act (FCPA) and other anti-corruption provisions; (2) controls on exports and re-exports of products, technology, and software; (3) customs and import regulations; (4) anti-boycott laws; and (5) U.S. sanctions and economic embargoes. We expect providers and their assigned personnel to comply with the letter and spirit of these laws and regulations.

Safety & Environmental

Providers must work in a way that ensures the safety of their employees and the safety of others, including EP Energy personnel, while on EP Energy premises or project sites. The work should also be accomplished in a way that exemplifies environmental stewardship and that is in accordance with all applicable laws, rules and regulations. All injuries, incidents and actual or potential safety, health or environmental hazards involving work on EP Energy premises or project sites must be immediately reported to the EP Energy Job Representative and addressed promptly.

Employment Practices

EP Energy is committed to treating everyone with dignity and respect, and therefore maintains high standards for personal behavior in the workplace. Providers and their assigned personnel are expected to behave appropriately when working on EP Energy premises or project sites. EP Energy will not tolerate any inappropriate conduct by third party service providers or their subcontractors and their assigned personnel that is harassing, abusive, threatening, offensive or intimidating.

While working on EP Energy premises or project sites, providers and their assigned personnel are expected to comply with all applicable employment laws and regulations including discrimination, immigration, minimum wage, overtime, payday and other legal requirements.

Prohibited Items Including Illegal Drugs, Alcohol & Weapons

In order to provide a safe and healthy work environment for all workers, smoking is prohibited within any of EP Energy's enclosed facilities, and is also strictly prohibited in other specified locations because of safety considerations.

The use, possession, or sale of alcoholic beverages on EP Energy premises is prohibited. In addition, the use, possession, or sale of illegal drugs or drug paraphernalia or the possession of firearms or other weapons while on EP Energy premises and project sites is prohibited.

Gifts & Entertainment

Giving or receiving gifts or entertainment must relate to EP Energy's legitimate business. Generally exchanging modest gifts, entertainment, or other business courtesies consistent with normal business practice is permissible.

EP Energy employees may not accept anything from an existing or potential provider that could be construed as an attempt to induce the employee to grant an unfair competitive advantage or to motivate the employee to do anything that is unethical, illegal or prohibited by EP Energy policies.

EP Energy employees are also asked to use common sense and good judgment when offering gifts or entertainment to providers, so as not to create circumstances that are inappropriate or give even the appearance of impropriety.

Providers and their assigned personnel are expected to comply with the same standards with respect to EP Energy employees.

Accuracy of Business Records

Providers must record and report information accurately, honestly, and objectively.

All financial books, records and accounts of EP Energy must accurately reflect transactions, payments and events. EP Energy requires compliance with generally accepted accounting principles and its internal system of accounting and auditing controls. Accurate, reliable information and records are critical to meeting EP Energy's financial, legal, and management obligations.

Similarly, all operational records must be accurate, filed in a timely fashion in accordance with applicable laws and regulations, and conform to EP Energy's operating requirements.

Confidential Information & Trade Secrets

Confidential information includes facts, data and knowledge that are not generally disclosed to the public and that may provide EP Energy a competitive advantage.

Providers and assigned personnel must safeguard EP Energy's and its third parties' confidential and proprietary information by keeping it secure and limiting access to only those parties who have a need to know. Such information shall not be released without written approval from the senior officer of the
applicable business unit. Providers and assigned personnel must take utmost care in handling, safeguarding, discussing, or transmitting sensitive or confidential information.

The responsibility to protect EP Energy's and its third parties confidential information is a continuing obligation even after your assignment or business relationship with EP Energy ends.

Use of Electronic Media

Electronic media is primarily to be used for business purposes.

Providers and assigned personnel must communicate protected information in a way that recognizes and safeguards the sensitivity of the information, the possibility of unauthorized access, and compliance with local data protection laws.

Providers and assigned personnel will not knowingly download, save, view or forward materials of a discriminatory, harassing, threatening, sexual, pornographic, racist, sexist, defamatory or otherwise offensive nature.

Providers and assigned personnel will not knowingly detach, decompress, run/launch or install any files or programs on EP Energy's systems without written permission of the EP Energy Information Technology department. Great care must be exercised to avoid opening attachments that have damaging computer viruses. Providers will also not download or disseminate any material from the Internet or EP Energy's Intranet unless the copyright owner has provided consent and shall otherwise comply with any licensing agreements and requirements.

Providers and assigned personnel will not place information acquired from EP Energy's network in any other location unless (i) approved by EP Energy, (ii) necessary to perform work for EP Energy, (iii) kept at least as secure by the provider as when resident on the EP Energy network and (iv) maintained off the EP Energy network only for so long as required by the work performed by the provider for EP Energy.

Providers and assigned personnel shall have no expectation of privacy on EP Energy's network. At any time and without prior notice, EP Energy may examine all information stored on EP Energy's network.

Questions

If you have a question or need additional information or guidance on these standards, please feel free to contact the EP Energy Ethics and Compliance Office by phone at (855) 321-7507 or by e-mail at ethics@epenergy.com.

These standards are provided in addition to any applicable contract requirements. In the event of any conflict, the contract shall prevail.

Notes

Helpline: (855) 231-7507
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