

## WESTERN SPIRIT CLEAN LINE LLC CODE OF CONDUCT FOR EMPLOYEES, RIGHT-OF-WAY AGENTS AND SUBCONTRACTOR EMPLOYEES

This Code of Conduct applies to all communications and interactions with property owners and occupants of property by all employees, right-of-way agents and subcontractor employees representing Western Spirit Clean Line LLC (“Western Spirit”) in the negotiation of right-of-way and the performance of surveying, environmental assessments and the other activities for the Western Spirit project (the “Project”) on property not owned by Western Spirit.

- I. All communications with property owners and occupants must be factually correct and made in good faith.
  - a. Do provide maps and documents necessary to keep the landowner properly informed.
  - b. Do not make false or misleading statements.
  - c. Do not purposely or intentionally misrepresent any fact.
  - d. If you do not know the answer to a question, do not speculate about the answer. Advise the property owner that you will investigate the question and provide an answer later.
  - e. Follow-up in a timely manner on all commitments to provide additional information.
  - f. Do not send written communications suggesting an agreement has been reached when, in fact, an agreement has not been reached.
  - g. If information provided is subsequently determined to be incorrect, follow up with the landowner as soon as practical to provide the corrected information.
  - h. Do provide the landowner with appropriate contact information should additional contacts be necessary.
- II. All communications and interactions with property owners and occupants of property must be respectful and reflect fair dealing.
  - a. When contacting a property owner in person, promptly identify yourself as representing Western Spirit.
  - b. When contacting a property owner by telephone, promptly identify yourself as representing Western Spirit.
  - c. Do not engage in behavior that may be considered harassing, coercive, manipulative, intimidating or causing undue pressure.
  - d. All communications by a property owner, whether in person, by telephone or in writing, in which the property owner indicates that he or she does not want to negotiate or does not want to give permission for surveying or other work on his or her property, must be respected and politely accepted without argument. Unless specifically authorized by Western Spirit, do not contact the property owner again regarding negotiations or requests for permission.
  - e. When asked to leave the property, promptly leave and do not return unless specifically authorized by Western Spirit.
  - f. If discussions with the property owner become acrimonious, politely discontinue the discussion and withdraw from the situation.
  - g. Obtain unequivocal permission to enter the property for purposes of surveying or conducting environmental assessments or other activities. Clearly explain to the property owner the scope of the work to be conducted based on the permission given.

Attempt to notify the occupant of the property each time you enter the property based on this permission.

- h. Do not represent that a relative, neighbor and/or friend have signed a document or reached an agreement with Western Spirit.
  - i. Do not ask a relative, neighbor and/or friend of a property owner to convince the property owner to take any action.
  - j. Do not represent that a relative, neighbor and/or friend supports or opposes the Project.
  - k. Do not suggest that any person should be ashamed of or embarrassed by his or her opposition to the Project or that such opposition is inappropriate.
  - l. Do not suggest that an offer is “take it or leave it.”
  - m. Do not argue with property owners about the merits of the Project.
  - n. Do not threaten to call law enforcement officers or obtain court orders.
  - o. Avoid discussing a property owner’s failure to note an existing easement when purchasing the property and other comments about the property owner’s acquisition of the property.
  - p. Do not threaten the use of eminent domain.
- III. All communications and interactions with property owners and occupants of property must respect the privacy of property owners and other persons.
- a. Discussions with property owners and occupants are to remain confidential.
  - b. Do not discuss your negotiations or interactions with other property owners or other persons unaffiliated with Western Spirit.
  - c. Do not ask relatives, neighbors and/or friends to influence the property owner or any other person.