

SUPPLIER CODE OF CONDUCT OF KINETIK HOLDINGS INC.

Effective April 1, 2023

I. PURPOSE

At Kinetik Holdings Inc. (“Kinetik” or the “Company”), we believe that integrating environmental, safety, governance and community considerations into our business decisions is essential to creating value for our stakeholders. Kinetik is committed to sustainability and operating with integrity in an economically, environmentally and socially responsible manner, and we extend this commitment to all our vendors, contractors, consultants and other service providers (collectively, our “Suppliers”),

This Supplier Code of Conduct (“Code”) sets forth our expectations in terms of values, policies and procedures related to ethics, compliance, safety, environment, health, and human rights. Adherence to the policies contained herein is required, and Suppliers shall ensure that their employees, contractors and subcontractors are fully compliant with the provisions of this Code.

Ethics, responsibility and integrity are the foundation of who we are at Kinetik. Fraud, dishonesty, unethical or criminal conduct on the part of any Supplier or anyone doing business with Kinetik will not be tolerated.

II. RESPONSIBILITIES

A. Compliance with Applicable Laws, Rules, and Regulations

It is Kinetik’s policy to conduct its business fairly, ethically, and in compliance with all applicable laws, rules, regulations and government requirements applicable to Kinetik’s business. Suppliers are responsible for familiarizing themselves with this Code and complying with all applicable laws, rules, regulations and requirements that are relevant to their scope of work with Kinetik

B. Safety and Environmental Stewardship

Operational safety and environmental protection are top priorities at Kinetik, and we require a commitment from all employees, Suppliers and other business partners to operate in a safe, reliable and environmentally sound manner. This Code details our expectations for our Suppliers regarding the safety of people, protection of property, and respectful and responsible stewardship of the environment.

Kinetik’s goal is zero incidents and zero injuries. We believe all incidents are preventable, and we have built a culture in which safety and environmental protection are everyone’s responsibility. We require Suppliers to demonstrate this same responsibility by providing a safe workplace for their employees and by minimizing their impact on the environment.

It is our expectation that our Suppliers maintain and comply with the same safety and environmental protocols and standards as our employees. As such, Suppliers must comply with:

- (a) all applicable local, state and federal laws and regulations concerning safety and the environment;
- (b) all policies contained in Kinetik's Environmental, Health and Safety (EHS) Manual and Kinetik's Contractor EHS Manual;
- (c) all applicable permits, permit terms and special conditions at a permitted facility;
- (d) all other applicable Kinetik environmental, health and safety related rules, policies and or procedures, including but not limited to SPCC Plans, Site Operating Procedures, Construction Procedures, etc.; and
- (e) Other industry best practices and guidelines to maintain safety and minimize environmental impacts.

Everyone is empowered to fulfill their responsibility to stop work where they believe a potential for a safety or environmental incident exists. Incidents, unsafe practices or conditions or potential noncompliance with applicable laws or policies and procedures must be reported to Kinteik immediately.

C. Drug and Alcohol-Free Workplace

Kinetik is a drug free and alcohol-free workplace. To ensure we conduct our business in a safe and responsible manner, Kinetik prohibits the use, sale, distribution or possession of drugs or alcohol on Company premises. Suppliers are prohibited from being under the influence of illegal or illicit drugs, prescription medication that can impair judgment, or alcohol while performing work activities on Company business or property. Kinetik may at times, such as official Company events or celebrations, permit the use of alcohol so long as it is approved in advance by management. However, the individual remains at all times personally responsible for their own conduct. Kinetik reserves the right to conduct searches for security reasons for unauthorized substances and other contraband of any individual's personal property, living quarters, common areas and vehicles located on Kinetik property.

D. Anti-Discrimination and Anti-Harassment:

Kinetik is committed to providing a work environment free from any form of discrimination or harassment and will not tolerate unlawful discrimination or harassment in the workplace. Kinetik prohibits any form of unlawful discrimination and harassment based on race, color, age, national origin, religion, sexual orientation, sex (including pregnancy, childbirth, or related medical conditions), gender identity or expression, military or veteran status, physical or mental disability, genetic information, or status in any group protected by law.

Harassment includes unwelcome verbal, visual, or physical conduct creating an intimidating, offensive, or hostile work environment. Examples of harassment include, but are not limited to, verbal, graphic, or physical conduct that degenerates or shows hostility or aversion toward an individual because of any protected characteristic. With respect to sexual harassment, Kinetik prohibits conduct which includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual or otherwise offensive nature.

E. Human Rights

Kinetik's commitment to human rights goes beyond our employees or those working for the Company on a contract basis. Kinetik expects and requires those that do business with the Company to reflect our values and share our commitment to promoting ethical conduct and human rights.

Kinetik operates its business in a manner that reflects its support and respect for the protection and advancement of human rights. Kinetik expects and requires that Suppliers will adhere to their responsibility to respect and observe universally recognized rights and freedoms. These include, among other things, the right to a safe work environment and the right to a workplace free from any form of child labor, forced labor, modern slavery or human trafficking.

These principles mean that all Kinetik Suppliers must embody and model the Company's core values at all times. Accordingly, Suppliers are prohibited from engaging in any activity that supports, encourages, or is linked to child labor, forced labor, modern slavery or human trafficking.

F. Diversity, Equity and Inclusion

Kinetik considers diverse perspectives and backgrounds a source of deep competitive advantage, as we know the best ideas come from listening to everyone. We build trust-based relationships through mutual respect and honest transparent communication, ultimately promoting an equitable and inclusive workplace where employees feel respected and valued for their contributions.

Kinetik also recognizes that a strong, diverse supplier community is essential to economic vitality and strengthens the communities where we live and work, and we seek opportunities to conduct business with competitive, diverse suppliers.

We expect our suppliers to engage a team that reflects these same principals and encourage our suppliers to make a good faith effort to ensure that diverse-owned enterprises have a significant opportunity to participate as second-tier subcontractors or suppliers to Kinetik.

G. Anti-Bribery and Anti-Corruption

Kinetik is committed to conducting its business fairly and in accordance with the highest ethical standards, and it is our expectation that our Suppliers uphold the same values and ethical practices. As such, Suppliers shall not use unfair techniques, such as misrepresentation of material facts or improper concealment of business information to gain a business advantage. Additionally, Suppliers shall not offer or accept a bribe, kickback or improper favor in order to secure a business advantage.

As a publicly-traded entity, the Company is also subject to the Foreign Corrupt Practices Act (FCPA) and similar laws of other nations, and Suppliers are expected to understand and comply with these requirements in our business relationships.

H. Conflict of Interest

Suppliers are expected to act in Kinetik's best interest and avoid engaging in activities in which the Company may conclude constitutes a conflict of interest. Suppliers, their employees, their family members and their close friends cannot receive improper benefits through their relationship with Kinetik or allow other activities to conflict with acting in the best interests of Kinetik.

Any direct or indirect conflict of interest is prohibited unless the Company grants its consent.

A conflict of interest exists if, in the course of duties for Kinetik, judgment and discretion is or may be influenced by considerations of personal gain or benefit to a third party other than Kinetik. Note that a conflict exists and must be disclosed as set forth below, where you could be influenced to act in a way that benefits you or a third party – that is, you need not be actually influenced. Thus, even if you are certain and steadfast that you can set the actual or potential conflict aside and only make decisions that are in the best interest of Kinetik, that issue must be disclosed so that the Company can make a determination about how the conflict should be addressed. Reasonable judgement should be used when assessing a potential conflict of interest, especially with regard to any family or personal business interest or relationship or business with a close personal friend.

I. Brand and Trademarks

We expect Suppliers to conduct themselves at all times in ways that reinforce and strengthen the Kinetik brand. Suppliers may not use the Kinetik brand or Kinetik's trademarks without express written permission.

J. Competitive Protocol

Kinetik requires all suppliers to engage in the highest ethical standards during the Supplier selection process.

Any Kinetik Requests for Proposals (RFPs), agreements, and contracts are confidential, and Suppliers must not discuss or disclose any information from such documents with other third parties. Suppliers must also refrain from discussing or disclosing its pricing, costs and any other contract terms with their competitors, specifically during a competitive bidding process.

III. COMPLIANCE, QUESTIONS AND CONCERNS

This Code is not intended to address every potential situation that relates to our standards of conduct. However, we expect our Suppliers to always conduct themselves ethically, responsibly, and with integrity - the same values we expect of our employees.

If there is a concern, Kinetik's practice is to work with the Supplier to identify improvements and to resolve issues. However, we reserve the right to discontinue our relationship with a Supplier for non-adherence to this Code. Additionally, Suppliers must maintain documentation reasonably necessary to evidence compliance with this Code and such documentation must be made available to Kinetik upon request.

Suppliers, their employees, or their subcontractors are expected to report any suspected violations of this Code to:

- Kinetik's Chief Compliance Officer; or
- Kinetik's Ethics & Compliance Hotline at 844-659-5688

If you have any questions or concerns regarding this Code, please contact your supply chain representative.

IV. WAIVERS

Any waiver of this Code for a Supplier must be granted in writing by the Kinetik Chief Compliance Officer. All requests for waivers will be considered on a case-by-case basis.