

SUPPLIER CODE OF CONDUCT OF KINETIK HOLDINGS INC.

Effective October 1, 2025

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 our vendors, contractors, consultants, and other service providers (collectively, our “Suppliers”), each of whom is engaged as an independent business entity and are not considered employees of Kinetik.

This Supplier Code of Conduct (“Code”) sets forth our expectations in terms of values, policies, and procedures related to ethics, compliance, safety, environment, health, human rights, and other business conduct. Suppliers are expected to acknowledge and adhere to the standards set forth in this Code when conducting business on behalf of Kinetik. Suppliers are also expected to communicate these standards to their own suppliers, subcontractors, and other business partners, and to monitor and enforce compliance within their supply chains.

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 must comply with all applicable laws, regulations, and relevant Kinetik policies and procedures, and are solely responsible for their own employees, subcontractors, and agents. Kinetik reserves the right to assess, monitor or audit Supplier compliance with this Code. Failure to comply may result in corrective action, including but not limited to, suspension or termination of the business relationship.

B. Ethical Business Practices

Suppliers must conduct business in an ethical manner, including compliance with applicable laws and obligations related to anti-bribery, anti-corruption, conflicts of interest, fair competition, and confidentiality.

C. Human Rights

Kinetik is committed to operating with integrity and respect for human rights. We expect our Suppliers to reflect these values and to conduct their business in a manner that supports the protection and advancement of universally recognized rights and freedoms. This includes:

- (a) **Respect human dignity** by treating all personnel, including their own employees and subcontractors, with fairness, professionalism, and respect.
- (b) **Prohibit the use of forced labor, child labor, modern slavery, and human trafficking**, including activities that support, encourage, or are linked to such practices.
- (c) **Provide a safe and healthy work environment** and comply with all applicable occupational health and safety laws and regulations.
- (d) **Uphold fair labor practices** by complying with all applicable laws regarding working hours, overtime, wages, benefits, and conditions of employment. Working hours must not exceed applicable legal limits, and compensation should meet or exceed minimum legal requirements.
- (e) **Respect freedom of association and collective bargaining rights** in line with applicable laws, including workers' right to join, not join, or form organizations of their own choosing without fear of retaliation.
- (f) **Maintain a workplace free from discrimination or harassment**, consistent with applicable law, and make employment decisions in good faith, based on qualifications, performance, and business needs.
- (g) **Where Suppliers provide housing or dormitories**, ensure that living conditions are in compliance with all applicable laws and regulations regarding safety, cleanliness, and standards of health, safety, and human dignity.

Kinetik prohibits any activity by Suppliers that supports, encourages, or is linked to forced labor, human trafficking, or other violations of human rights. Suppliers should conduct risk-based human rights due diligence and take steps to identify, prevent, and remediate potential adverse impacts, and provide workers with grievance mechanisms to raise concerns in good faith without fear of retaliation.

D. 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 responsible manner.

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.

Suppliers are expected to achieve a level of safety and environmental performance consistent with Kinetik's protocols and standards. This includes, as applicable:

- (a) compliance with applicable local, state, and federal laws and regulations concerning safety and the environment;
- (b) adherence to applicable provisions of the Kinetik Environmental, Health and Safety (EHS) Manual as they relate to project-specific requirements and site conduct;
- (c) compliance with applicable permits, permit terms, and special conditions at a permitted facility;

- (d) adherence to other applicable Kinetik environmental, health, and safety related rules, policies and/or procedures, including but not limited to contractor orientation requirements, SPCC Plans, Site Operating Procedures, Construction Procedures; and
- (e) adherence with other recognized 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 potential for safety or environmental incident exists. Incidents, unsafe practices or conditions, or potential noncompliance with applicable laws, policies, or procedures must be reported to Kinetik immediately.

Suppliers are encouraged to adopt practices that go beyond compliance, including reducing greenhouse gas emissions, conserving energy and water, and minimizing waste. Suppliers are expected to support Kinetik's broader environment and sustainability commitments by pursuing continuous improvement in environmental performance.

E. 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.

F. Anti-Discrimination and Anti-Harassment:

Kinetik requires all Suppliers to maintain a professional and respectful environment free from unlawful discrimination or harassment when conducting business on behalf of Kinetik or on Company property. Kinetik prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, familial status, marital status, or any other characteristic 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.

G. Equal Employment Opportunity and Inclusive Practices

Kinetik is committed to maintaining a professional, respectful, and inclusive environment. Our policies, culture, and leadership expectations promote fairness, consistency, and equal opportunity across all areas of employment.

Kinetik expects its Suppliers to uphold these same principles by providing equal employment opportunities to their employees and applicants, and by prohibiting discrimination or harassment based on any characteristic protected by applicable law. Employment decisions should be made in good faith, based on qualifications, performance, and business needs.

H. 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.

I. Conflict of Interest

Suppliers are expected to act in Kinetik's best interest and avoid engaging in activities that may create 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 approved in writing by Kinetik.

A conflict of interest exists if, in the course of Supplier's engagement with Kinetik, their independent business 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.

J. 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 trademarks without express prior written authorization.

K. Confidential Information and Competitive Protocol

Suppliers must treat all Kinetik Requests for Proposals (RFPs), agreements, contracts, and related communications as confidential and must not disclose such information to other third parties without Kinetik's prior written consent. 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.

Kinetik also expects Suppliers to safeguard all other confidential information obtained through their relationship with Kinetik. Confidential information may include, but is not limited to:

- (a) technical, operational, or financial information;
- (b) trade secrets and intellectual property;
- (c) business strategies, bids, or transaction details; and
- (d) other information relating to Kinetik's business that is not public knowledge

Suppliers must use due care to prevent unauthorized, inadvertent, or improper disclosure of such information.

III. COMPLIANCE, QUESTIONS AND CONCERNS

Nothing in this Code is intended to diminish or change the independent contractor status of any Supplier. All Suppliers are engaged as independent businesses and are not considered employees of Kinetik.

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.

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 General Counsel and 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 General Counsel and Chief Compliance Officer. All requests for waivers will be considered on a case-by-case basis.