



# **STANDARDS OF CONDUCT COMPLIANCE PROCEDURES**

**TRAILBLAZER PIPELINE COMPANY LLC  
TALLGRASS INTERSTATE GAS TRANSMISSION, LLC  
ROCKIES EXPRESS PIPELINE LLC**

# Contents

I. INTRODUCTION .....	3
II. GENERAL PRINCIPLES (18 C.F.R. § 358.2).....	3
III. IDENTIFYING AFFILIATES WITH MARKETING FUNCTION EMPLOYEES .....	5
A. Who is an Affiliate? .....	5
B. What Are Marketing Functions?.....	6
C. Where Can One Locate the Names of the Tallgrass Interstate Pipeline Affiliates that Engage in Marketing Functions? .....	6
D. Shared Investor-Owners.....	7
IV. NON-DISCRIMINATION REQUIREMENTS (18 C.F.R. § 358.4).....	7
V. INDEPENDENT FUNCTIONING (18 C.F.R. § 358.5) .....	8
A. General Requirements.....	8
B. Separation of Functions .....	9
(1) Exclusions For Certain Information Exchanges .....	9
(2) Policy on Employee and Facility Separation .....	10
(3) Access to Facilities .....	11
C. Affiliate Compliance.....	11
VI. NO CONDUIT RULE – (18 C.F.R. § 358.6).....	11
A. Information Access – Files and Records.....	12
B. Limitations on Computer Access.....	12
VII. TRANSPARENCY REQUIREMENTS - (18 C.F.R. § 358.7).....	15
A. Contemporaneous Disclosure Requirements .....	15
B. Exclusion for Specific Transaction Information.....	16
C. Voluntary Consent Provision .....	16
D. Written Procedures.....	17
E. Affiliate Information.....	17
F. Employee Information .....	17
G. Timing and General Requirements of Postings .....	20
H. Waivers .....	21
VIII. IMPLEMENTATION REQUIREMENTS - (18 C.F.R. § 358.8) .....	21
A. Chief Compliance Officer.....	21
B. Training .....	21
C. Books and Records.....	22

**PROCEDURES OF  
THE TALLGRASS INTERSTATE PIPELINES  
FOR IMPLEMENTING THE FERC STANDARDS OF CONDUCT**

The following provides the Federal Energy Regulatory Commission (“FERC”) Standards of Conduct compliance procedures (“Compliance Procedures”) currently in effect for the interstate pipelines owned and/or operated by Tallgrass Energy, which include Trailblazer Pipeline Company LLC, Tallgrass Interstate Gas Transmission, LLC, and Rockies Express Pipeline LLC (together, the “Tallgrass Interstate Pipelines”). Each of these pipelines is a transmission provider for the purposes of the FERC Standards of Conduct, as set forth in 18 C.F.R. § 358.3(k). These Compliance Procedures will be posted publicly, and they will be updated on a timely basis consistent with the Standards of Conduct regulations to reflect relevant changes in applicable rules, procedures, policies, and circumstances.

## I. INTRODUCTION

Any questions regarding these Compliance Procedures should be directed to the Chief Compliance Officer (“CCO”) of the Tallgrass Interstate Pipelines. The CCO’s contact information is posted on the applicable pipeline’s interactive website located at <http://pipeline.tallgrassenergyllp.com>. The CCO’s contact information can be accessed by selecting Interstate Pipelines, the specific pipeline, Informational Postings, Standards of Conduct, Chief Compliance Officer.

## II. GENERAL PRINCIPLES (18 C.F.R. § 358.2)

A fundamental element of the Standards of Conduct is the distinction between Transmission Functions and Marketing Functions, which the FERC defines as follows:

- **Transmission Functions**: the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests, including gas control, scheduling, and responding to a shipper's request for capacity.
- **Marketing Functions**: the sale of gas for resale in interstate commerce, or the submission of offers to sell gas, subject to certain exemptions that are described below.

Accordingly, a Transmission Function Employee refers to an employee, contractor, consultant or agent of a transmission provider who actively and personally engages in transmission functions. Likewise, a Marketing Function Employee is defined as an employee, contractor, consultant or agent of a transmission provider or its affiliate who actively and personally engages in marketing functions. The Standards of Conduct are applicable to all Transmission Providers that conduct transmission transactions with affiliates that engage in marketing functions and employ Marketing Function Employees (hereinafter referred to as "Affiliates"). The Standards of Conduct establish four general principles: (1) Non-Discrimination; (2) Independent Functioning; (3) Non-Disclosure/No Conduit; and (4) Transparency/Equal Access. Those principles are set out at 18 C.F.R. § 358.2 and will be explained in further detail below. The Tallgrass Interstate Pipelines have adopted these four principles as corporate policy applicable to their operations and activities, as follows:

1. The Tallgrass Interstate Pipelines will treat all transmission customers, affiliated and non-affiliated, on a not unduly discriminatory basis, and will not make or grant any undue preference or advantage to any person or subject any person to any undue prejudice or disadvantage with respect to any transportation or wholesale sale of natural gas in interstate commerce.

2. The Transmission Function Employees of each of the Tallgrass Interstate Pipelines will function independently of Marketing Function Employees.
3. The Tallgrass Interstate Pipelines, including their employees, contractors, consultants, and agents are prohibited from disclosing, or using a conduit to disclose, non-public transmission function information to the pipelines' Marketing Function Employees.
4. The Tallgrass Interstate Pipelines will provide equal access to non-public transmission function information to the respective pipeline's customers, affiliated and non-affiliated, except in the case of confidential customer information or Critical Energy Infrastructure Information.

Each Tallgrass Interstate Pipeline also abides by the spirit of these principles regardless of whether an Affiliate that employees a Marketing Function Employee ships on the particular pipeline.

### III. IDENTIFYING AFFILIATES WITH MARKETING FUNCTION EMPLOYEES

#### A. Who is an Affiliate?

An Affiliate is another person or company that controls,<sup>1</sup> is controlled by, or is under common control with any of the Tallgrass Interstate Pipelines. Each Tallgrass Interstate Pipeline is subject to the Standards of Conduct if it has an Affiliate that engages in “marketing functions” and transmission-related activity on the particular Tallgrass Interstate Pipeline. This means that a company can be an Affiliate of one Tallgrass Interstate Pipeline, but not of another Tallgrass Interstate Pipeline for Standards of Conduct purposes.

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<sup>1</sup> FERC's Standards of Conduct regulations provide that “control” means the direct or indirect authority, whether acting alone or in conjunction with others, to direct or cause to direct the management policies of an entity. A voting interest of ten percent or more creates a rebuttable presumption of control. *See* 18 C.F.R. §§ 358.3(a) and (c).

## B. What Are Marketing Functions?

Marketing functions consist of the sale for resale in interstate commerce of natural gas (including the submission of offers to sell). There are certain types of natural gas sales that are not considered to be “marketing functions” subject to the Standards of Conduct: (i) bundled retail sales; (ii) incidental purchases or sales of gas to operate pipeline facilities; (iii) sales of gas solely from a seller’s production; (iv) sales of gas solely from a seller’s gathering or processing facilities; or (v) on-system sales by an intrastate pipeline, Hinshaw interstate pipeline<sup>2</sup> exempt from FERC jurisdiction under the Natural Gas Act, a local distribution company, or by a local distribution company operating under section 7(f) of the Natural Gas Act.

## C. Where Can One Locate the Names of the Tallgrass Interstate Pipeline Affiliates that Engage in Marketing Functions?

The name and address of the Affiliates of the Tallgrass Interstate Pipelines that engage in marketing functions can be found in the Informational Postings section of each pipeline’s Internet website under the heading Standards of Conduct, subheading Affiliate Names & Addresses. New Affiliates and revisions to the current list of Affiliates will be posted within seven business days of the change. This website is located at <http://pipeline.tallgrassenergyllp.com>. The Affiliate Names and Addresses can be accessed by selecting Interstate Pipelines, the specific pipeline, Informational Postings, and then selecting Standards of Conduct, Affiliate Names & Addresses. At this time, Ascent Resources – Utica, LLC, a shipper on Rockies Express Pipeline LLC, is the only known Affiliate of a Tallgrass Interstate Pipeline.

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<sup>2</sup> A facility is a Hinshaw pipeline if it receives natural gas within or at the border of a state and all of the gas it transports is consumed within the same state, provided that the facility’s rates and services are subject to state regulation.

#### D. Shared Investor-Owners

Certain shippers are or may be Affiliates of a Tallgrass Interstate Pipeline (as posted under the pipeline's list of Affiliate Names & Addresses) by virtue of the fact that the Tallgrass Interstate Pipeline and a shipper have the same investor-owner that meets the requisite threshold for control in the two entities. If the investor-owner has an interest in the shipper, and such shipper engages in transportation transactions on a Tallgrass Interstate Pipeline, then it may be an Affiliate of that pipeline, even though no employees of the Tallgrass Interstate Pipelines perform marketing functions and no employees, facilities, or functions are shared between the Tallgrass Interstate Pipeline and this shipper. The Tallgrass Interstate Pipelines will modify the list of Affiliate Names & Addresses posted on their websites as they become aware of acquisitions and/or divestures by investor-owner(s) in interests in the Tallgrass Interstate Pipelines.

#### IV. NON-DISCRIMINATION REQUIREMENTS (18 C.F.R. § 358.4)

The Tallgrass Interstate Pipelines have adopted and implemented the following policies and procedures with respect to administration of each of the Tallgrass Interstate Pipelines' respective tariff:

1. The Tallgrass Interstate Pipelines strictly enforce all tariff provisions relating to the sale or purchase of open access transmission service, if these tariff provisions do not permit the use of discretion.
2. The Tallgrass Interstate Pipelines apply all tariff provisions relating to the sale or purchase of open access transmission service in a fair and impartial manner that treats all transmission customers in a not unduly discriminatory manner, if these tariff provisions permit the use of discretion. Any such exercise of discretion shall be determined on a case-by-case basis, under the supervision of the manager or director for the relevant business area and the FERC Compliance Team.

3. The Tallgrass Interstate Pipelines do not, through tariffs or otherwise, give any undue preference to any person in matters relating to the sale or purchase of transmission service (including, but not limited to, issues of price, curtailments, scheduling, priority, ancillary services, or balancing).
4. The Tallgrass Interstate Pipelines process all similar requests for transmission in the same manner and within the same period of time.

## V. INDEPENDENT FUNCTIONING (18 C.F.R. § 358.5)

Under the Standards of Conduct, a transmission provider's Transmission Function Employees must work independently of its Affiliate(s)' Marketing Function Employees. The Tallgrass Interstate Pipelines have adopted and implemented procedures and policies, including those involving separation of employees and workspaces and restricted access to files and databases, in compliance with this requirement.

### A. General Requirements

The Tallgrass Interstate Pipelines have identified the Transmission Function Employees of each pipeline as well as the Marketing Function Employees of each Affiliate in light of the Standards of Conduct, and have determined that each pipeline's Transmission Function Employees work independently of the Marketing Function Employees of the respective pipeline's Affiliates. In addition, the Tallgrass Interstate Pipelines have put directives and/or policies into effect to ensure that Transmission Function Employees do not share facilities or equipment with any Affiliate's Marketing Function Employees, as discussed in Section B below. For reference, the job titles and job descriptions of the Transmission Function Employees of the Tallgrass Interstate Pipelines are posted on each pipeline's Internet website. This website is located at <http://pipeline.tallgrassenergyllp.com>.



The Job Titles & Descriptions can be accessed by selecting Interstate Pipelines, the specific pipeline, Informational Postings, and then selecting Standards of Conduct, Job Titles & Descriptions.

B. Separation of Functions

The Tallgrass Interstate Pipelines do not permit the Marketing Function Employees of their Affiliates to:

- (i) Conduct transmission functions; or
- (ii) Have access to the system control center or similar facilities or systems used for transmission operations (e.g., CONNECT) that differs in any way from the access available to other unaffiliated transmission customers.

In addition, the Tallgrass Interstate Pipelines will not permit any Transmission Function Employees to conduct marketing functions for its Affiliates.

(1) Exclusions For Certain Information Exchanges

Notwithstanding the general requirements, there are some limited circumstances when the Tallgrass Interstate Pipelines' Transmission Function Employees may exchange non-public transmission function information with an Affiliate's Marketing Function Employees. This may occur when the information pertains to compliance with Reliability Standards approved by FERC or information necessary to maintain or restore operation of the transmission system. The CCO of the respective Tallgrass Interstate Pipelines, or their designee, will make and retain a contemporaneous record of all such exchanges. In emergency situations, when the CCO or their designee cannot make a record contemporaneously, a record of the exchange will be made as soon as practicable after the fact. These records will be maintained for a period of five years. In addition, a Transmission Function Employee of a Tallgrass Interstate Pipeline may discuss an Affiliate's specific transmission request

with that Affiliate's Marketing Function Employees. A contemporaneous record of such discussions is not required to be disclosed.

(2) Policy on Employee and Facility Separation

The following policies and procedures have been put in place to separate the workspaces of the Tallgrass Interstate Pipelines' Transmission Function Employees and any Affiliates' Marketing Function Employees to ensure that the employees function independently of one another.

If any Transmission Function Employee of a Tallgrass Interstate Pipeline is in the same building as any officer, director or employee of an Affiliate(s), then the pipeline's Transmission Function Employees and the Affiliate(s)' Marketing Function Employees must either: (i) work on different floors, with access to the floors with Transmission Function Employees restricted by key cards or locks; or (ii) if a Transmission Function Employee of a Tallgrass Interstate Pipeline and a Marketing Function Employee of its Affiliate(s) work on the same floor in any building, there must be a physical barrier comprised of walls and doors to separate the workspaces and establish privacy of the two employee groups, with access to the Transmission Function Employees of a Tallgrass Interstate Pipeline limited through the use of key cards or locks. Limitations on access are posted clearly and prominently on signs located at entrances to any facility or workspace at which any Transmission Function Employee of a Tallgrass Interstate Pipeline is located.

If a Transmission Function Employee or a Marketing Function Employee transfers to a different work area location, such transferring employee's new work area location will be consistent with the above described physical separation of Transmission Function Employee and Marketing Function Employee work areas.

All meetings between Transmission Function Employees of a Tallgrass Interstate Pipeline and Marketing Function Employees of any Affiliate will be limited to topics permitted under the Standards

of Conduct, and will be scheduled at a location outside the regular workspaces of such pipeline's Transmission Function Employees.

(3) Access to Facilities

Marketing Function Employees of the Tallgrass Interstate Pipeline's Affiliates do not have access: (a) to the Tallgrass Interstate Pipelines' facilities used to conduct transmission operations or reliability functions; or (b) to the system control center or similar facilities used for transmission operations or reliability functions.

C. Affiliate Compliance

There are no shared facilities between Transmission Function Employees and Marketing Function Employees at this time. From time to time, the pipelines' Transmission Function Employees and an Affiliate(s)' Marketing Function Employees (to the extent that same exist) may be located in the same building in Lakewood, Colorado. Whenever Transmission Function Employees and Marketing Function Employees work in the same building, the Marketing Function Employees will be located on a different floor, or in a physically isolated location on the same floor, than Transmission Function Employees and the Tallgrass Interstate Pipelines' gas control rooms. To the extent facilities are ever shared by a Tallgrass Interstate Pipeline's Transmission Function Employees and an Affiliate's Marketing Function Employees, the pipeline shall post the address and extent of the shared facilities on its public interactive website under the heading Shared Facilities.

## VI. NO CONDUIT RULE – (18 C.F.R. § 358.6)

The Standards of Conduct prohibit the Tallgrass Interstate Pipelines and their employees, contractors, consultants and agents from disclosing, or using any person as a conduit to disclose, non-public Transmission Function Information to Marketing Function Employees. The Tallgrass Interstate

Pipelines have accordingly implemented policies and procedures to assure that they will not use anyone as a conduit to disclose non-public Transmission Function Information to Marketing Function Employees of Affiliates. All of the Tallgrass Interstate Pipelines' employees, contractors, consultants and agents, and all of the employees, contractors, consultants and agents of their Affiliates, are prohibited from disclosing non-public Transmission Function Information to any Marketing Function Employees, either directly or indirectly. The Tallgrass Interstate Pipelines provide training on this "No-Conduit Rule" to these personnel in order to assure compliance with these requirements. They also require each of these persons to certify electronically that they have completed the required training. If any employee fails to certify in accordance with the training requirements, the CCO or their designee will follow-up with such persons to rectify the omission. The Regulatory department is responsible for administering this requirement, in conjunction with the CCO or their designee. Failure to complete the required training could result in disciplinary action.

A. Information Access – Files and Records

Employees of the Tallgrass Interstate Pipelines' Affiliates do not have access to any non-public files or records of the pipelines. To ensure compliance with this policy, access to physical files of the Tallgrass Interstate Pipelines is limited to authorized pipeline employees or support employees who have responsibilities on behalf of these interstate gas transmission pipelines. Any Tallgrass Interstate Pipeline personnel who may have access to such files are subject to the "No Conduit" procedure as discussed herein.

B. Limitations on Computer Access

The Standards of Conduct require the Tallgrass Interstate Pipelines to restrict access by Affiliate(s)' Marketing Function Employees to non-public transmission function information and

transmission customer information to prevent the disclosure of such information. Accordingly, the Tallgrass Interstate Pipelines have implemented the following procedures restricting computer access:

1. Marketing Function Employees of the respective Tallgrass Interstate Pipelines' Affiliates do not have access to any non-public transmission or transmission customer information of such pipeline.
2. The procedure for restricting access involves creating logical separation protocols to block access by Marketing Function Employees of the respective Tallgrass Interstate Pipelines' Affiliates to non-public transmission information and transmission customer information. Access to computer network facilities is controlled at several levels, including: the company level, the departmental level, the work group level, and/or the individual level. Access is limited to individuals who have been approved for, and have been granted access privileges to, the company's computer network facilities, and to each particular type of data. Logon ID and password verification is required to log on to the company network. Standard licensed software may be utilized to enforce this requirement. Databases and servers are also secured via the use of NT, UNIX, database and/or application security. Access to these resources is restricted, consistent with paragraph (1) above.
3. The Manager of Business Systems and the appointed Contract Administrator (together, the "Security Administrators") are responsible for reviewing all internal (*i.e.*, from Tallgrass Energy personnel) and external (*i.e.*, from non-Tallgrass Energy personnel) requests, respectively, for access and for application of security with respect to the CONNECT system. CONNECT is the primary database on the Tallgrass Interstate Pipelines' systems for accumulating, accessing and displaying shipper information, both internally and externally. Access to the non-public elements of CONNECT will

not be permitted unless the individual requesting access has work responsibility requiring such access. The Security Administrators and/or the Information Technology department have corresponding responsibility as to other data systems used internally by the Tallgrass Interstate Pipelines.

4. If there is any question as to whether a request for access to non-public databases containing Transmission Function Information is consistent with the Standards of Conduct and these Compliance Procedures, the Security Administrator or the Information Technology department, as applicable, will consult with the CCO or their designee upon the receipt of a request before granting such access. Marketing Function Employees will not be granted access to the Tallgrass Interstate Pipelines' non-public transmission or transmission customer information.
5. The Security Administrators and/or the Information Technology department, as applicable, will be notified in the event a new non-public Transmission Function Information database is created or the general parameters for access to an existing database are modified. Prior to granting any person access to non-public transmission or transmission customer information in the new or modified database, the Security Administrator or the Information Technology department, as applicable, will consult with the CCO or their designee if there is any question or uncertainty regarding continued compliance with the Standards of Conduct and these Compliance Procedures.

## VII. TRANSPARENCY REQUIREMENTS - (18 C.F.R. § 358.7)

### A. Contemporaneous Disclosure Requirements

The Tallgrass Interstate Pipelines maintain protections to ensure that the Marketing Function Employees of their Affiliates do not have access to any non-affiliated shipper information or transportation information that has not been contemporaneously disclosed to all transmission customers of the respective Tallgrass Interstate Pipeline, under the requirements of 18 C.F.R. § 358.7.

If a Tallgrass Interstate Pipeline discloses non-public transmission information in a manner contrary to the requirements of the No Conduit Rule or the rule prohibiting the disclosure of non-public Transmission Function Information to any Marketing Function Employees, the respective Tallgrass Interstate Pipeline will contemporaneously provide such information to all customers, whether affiliated or unaffiliated, via its Internet website. This website is located at <http://pipeline.tallgrassenergyllp.com>. Information Disclosures can be accessed by selecting Interstate Pipelines, the pipeline, Informational Postings, and then selecting Standards of Conduct, Information Disclosure.

If a Tallgrass Interstate Pipeline discloses, in a manner contrary to the requirements of the No Conduit Rule or the rule prohibiting the disclosure of non-public Transmission Function Information to any Marketing Function Employees, non-public transmission customer information, critical energy infrastructure information (CEII), or any other information that the FERC by law has determined to be subject to limited dissemination, the respective Tallgrass Interstate Pipeline will post notice on its website *the fact* that the information was disclosed.

To ensure compliance with the Standards of Conduct, Transmission Function Employees and any other employees that are likely to become privy to non-public transmission information and non-public customer information/CEII information receive training with respect to the requirements of the applicable Standards of Conduct and are given copies of these Compliance Procedures. The CCO or their designee will also distribute information, including updates and revisions regarding the Standards

of Conduct, to employees periodically each year.

If an employee discloses information in a manner contrary to the requirements regarding non-public transmission information and non-public customer information/CEII information described above, the manager or director of the business area in which the improper disclosure occurs is responsible for advising the CCO or their designee, so that an appropriate posting can be made. The respective Tallgrass Interstate Pipeline will immediately post such information on its Internet website. The Tallgrass Interstate Pipelines will ensure compliance with this standard through the annual training program and posting of written procedures to implement the Standards of Conduct.

**B. Exclusion for Specific Transaction Information**

Transmission Function Employees of a Tallgrass Interstate Pipeline may discuss with Marketing Function Employees of its Affiliate(s) specific requests for transmission service submitted by the Affiliate, including potential interconnects with or expansions involving any such Affiliate. Such transaction specific information is not required to be contemporaneously disclosed on the respective Tallgrass Interstate Pipeline's website. In addition, Transmission Function Employees are permitted to share information with Marketing Function Employees of its Affiliates as necessary to maintain the operations of the transmission system, as further discussed in Section V. B (1) above.

**C. Voluntary Consent Provision**

A non-affiliated transmission customer may voluntarily consent, in writing, to allow the respective Tallgrass Interstate Pipeline to share the customer's own non-public information with a Tallgrass Interstate Pipeline Affiliate's Marketing Function Employees. If the transmission customer authorizes such disclosure, the respective Tallgrass Interstate Pipeline will post a notice on its Internet website of that consent, under the heading Standards of Conduct, subheading Voluntary Consent,



along with a statement that it did not grant any preference, either operational or rate-related, in exchange for the consent. This website is located at <http://pipeline.tallgrassenergy.com>. Voluntary consents can be accessed by selecting Interstate Pipelines, the pipeline, Informational Postings, and then selecting Standards of Conduct, Voluntary Consent.

#### D. Written Procedures

The Tallgrass Interstate Pipelines have posted the current written procedures implementing the Standards of Conduct (i.e., these Compliance Procedures) on the Informational Postings section of their Internet websites.

#### E. Affiliate Information

Each Tallgrass Interstate Pipeline posts the following information on the Informational Postings portion of its Internet website:

(1) The names and addresses of the respective Tallgrass Interstate Pipeline's Affiliates that employ Marketing Function Employees to the extent such Affiliates engage in transmission-related activity on the Tallgrass Interstate Pipeline.

(2) A complete list of the employee-staffed facilities shared by the respective Tallgrass Interstate Pipeline Transmission Function Employees and Marketing Function Employees. This list will identify the type and address of each shared facility.

(3) Potential merger partners as Affiliates that may employ or retain Marketing Function Employees, within seven days after the potential merger is announced.

#### F. Employee Information

Job titles and job descriptions of Transmission Function Employees must be posted on each of the Tallgrass Interstate Pipeline's Internet websites. The CCO or their designee should be notified of any changes in Transmission Function Employees' job titles or descriptions. The posted listings of

Job Titles & Descriptions are periodically reviewed to ensure they are accurate. Where applicable, contractors are included.

Any transfer of a Transmission Function Employee to a position as a Marketing Function Employee, or vice versa, must be posted on the respective Tallgrass Interstate Pipeline's Internet website. Job transfers between Transmission Function Employees of a Tallgrass Interstate Pipeline and an Affiliate(s)' Marketing Function Employees are not precluded as long as such a transfer is not used as a means to circumvent the Standards of Conduct, such as through "cycling" of employees. The information to be posted includes the following:

- (a) Name of the transferring employee,
- (b) The respective titles held while performing each function (i.e., as a Transmission Function Employee and as a Marketing Function Employee), and
- (c) The effective date of the transfer.

The information posted under this section must remain on the Internet for ninety days.

To implement the requirement of posting notice of employee transfers from transmission to marketing function, or vice versa, the Tallgrass Interstate Pipelines have adopted the following procedure:

1. Each Tallgrass Interstate Pipeline provides a briefing regarding the Standards of Conduct to any Transmission Function Employee transferred from the respective Tallgrass Interstate Pipeline to a position as a Marketing Function Employee or from a Marketing Function Employee of an Affiliate to a position as a Transmission Function Employee of the respective Tallgrass Interstate Pipeline. Briefing will be done by the CCO or their designee, in cooperation with Human Resources. During the briefing session, confidentiality issues regarding non-public transmission and transmission customer information will be discussed. The briefing will include training that the use

of such non-public information in the employee's new function at the new position is strictly prohibited.

2. Responsibilities of the Transmission Function Employee transferred to a position as a Marketing Function Employee of its Affiliate must not include working on transportation accounts of those customers previously handled at the respective Tallgrass Interstate Pipeline until after an appropriate "cooling-off" period to be determined on a case-by-case basis sufficient to ensure that the customer information has lost its commercial value. Regardless of the types of contracts the employee worked on prior to the transfer, a transferred Transmission Function Employee may not work on any contract or transaction in which the employee could make use of non-public transportation information that the employee received while working for the respective Tallgrass Interstate Pipeline until after a "cooling-off" period to be determined on a case-by-case basis sufficient to ensure that such information has lost its commercial value.
3. Due to the volatile market conditions in the natural gas industry, the time frame in which information loses its commercial value varies. Therefore, the determination of the loss of commercial value will be made on a case-by-case basis and is dependent, at least in part, on an evaluation of the following factors: (i) the type of position the Transmission Function Employee is leaving; (ii) the type of position to which the Transmission Function Employee is transferring; (iii) the type and duration of the contracts the Transmission Function Employee handled while at his or her former position; and (iv) the nature and extent of non-public transmission information and transmission customer information the Transmission Function Employee had received.

4. Based on this evaluation in paragraph (3), the CCO or their designee will work with the supervisor of the transferring Transmission Function Employee to establish the appropriate “cooling-off” period during which the employee will not be permitted to work on the accounts or contracts of the non-affiliated shippers he or she handled at the respective Tallgrass Interstate Pipeline or may not engage in certain other activities where he or she could make use of non-public transmission information and non-public transmission customer information.
5. Access to computer and paper files containing non-public transmission and non-public transmission customer information will be suspended and withdrawn if the employee transfers to a position as a Marketing Function Employee effective on the day the employee transfers. An employee transferring to a marketing function position with an Affiliate of the respective Tallgrass Interstate Pipeline may not retain any files with non-public transmission information or transmission customer information.
6. The Human Resources department is responsible for administering these procedures governing employee transfers and for complying with the posting requirements of 18 C.F.R. §358.7(f)(2), in consultation with the CCO or their designee.

G. Timing and General Requirements of Postings

Each Tallgrass Interstate Pipeline will update the information required by FERC regulations in 18 C.F.R. Part 358, as set forth in this Section VII, on its Internet website within seven business days of any change, and post the date on which the information was updated. In the event of an emergency, such as an earthquake, flood, fire or hurricane, that severely disrupts a Tallgrass Interstate Pipeline’s normal business operations, the posting requirements may be suspended by the respective Tallgrass Interstate Pipeline. If the disruption lasts longer than one month, the respective Tallgrass Interstate Pipeline will notify the FERC and seek a further exemption from the posting requirements.

All of these Internet website postings comply with the applicable requirements of 18 C.F.R. §§ 284.12(a) & 284.12(b)(3)(v), including the requirement that all information displayed must be maintained and recoverable for a period of three years, unless the applicable regulation provides for a longer maintenance period (e.g., five years) and are sufficiently prominent to be readily accessible.

#### H. Waivers

Notice of each waiver of a tariff provision that the respective Tallgrass Interstate Pipeline grants in favor of an Affiliate, unless such waiver has been approved by the FERC, will be posted on the respective pipeline's website. The posting shall be made within one business day of the act of waiver. In addition, the respective Tallgrass Interstate Pipeline will maintain a log of the acts of waiver and make it available to the FERC upon request. This record must be kept for a period of five years from the date of each act of waiver.

### VIII. IMPLEMENTATION REQUIREMENTS - (18 C.F.R. § 358.8)

#### A. Chief Compliance Officer

The name and contact information for the CCO of the Tallgrass Interstate Pipelines is posted on the Internet website of each Tallgrass Interstate Pipeline. The CCO is responsible for supervising the following: the implementation of Standards of Conduct requirements; the monitoring of ongoing compliance; and the establishment, effectuation and maintenance of the training program described below. The CCO is also responsible for providing guidance and direction to, and for answering questions regarding the Standards of Conduct from, all areas of the company.

#### B. Training

Tallgrass Energy has an annual training program that is required for its Transmission Function Employees, Marketing Function Employees, officers, directors, supervisory employees and any other employees or contractors who are privy or likely to become privy to Transmission Function

Information. Annual training for employees is typically conducted in the first quarter of each calendar year and annual training for directors is typically conducted during the first or second quarter. New employees and contractors who are privy or likely to become privy to Transmission Function Information must also receive training within the first thirty days of their employment. All employees and contractors required to take the Standards of Conduct training, either upon joining the company or annually thereafter, are also required to certify that they have completed the training.

Such training is conducted via a presentation that is maintained and can be reviewed by each employee through Grassroots, the intranet webpage for Tallgrass Energy employees. Once an employee completes the training, they will be prompted to certify the same through Grassroots. The Human Resources Department will maintain records of employee participation in mandatory training. Supplements to this basic training will be provided via the intranet and/or e-mail, if and when necessary to reflect any significant updates.

These Compliance Procedures are distributed electronically to all individuals required to be trained as newly hired personnel, as well as annually. Any subsequent revisions to these procedures will be made available to employees electronically via the intranet and e-mail, as appropriate.

### C. Books and Records

Under 18 C.F.R. § 358.8(d), each Tallgrass Interstate Pipeline must maintain its books of accounts and records (as prescribed under 18 C.F.R. Parts 201 and 225) separately from those of its Affiliates that retain Marketing Function Employees and these books and records must be available for FERC inspection. Each Tallgrass Interstate Pipeline currently maintains its books and records separate from any of its Affiliates and will continue to maintain separate books and records so long as is required by the Standards of Conduct.