

Global Whistleblower Policy

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Global Whistleblower Policy

1. Introduction

Altera Infrastructure L.P., together with its subsidiaries, controlled affiliates, and general partner, Altera Infrastructure GP L.L.C. (collectively “Altera”, the “Group”, “we”, “us”) is committed to conducting business in compliance with our Code of Conduct and applicable law. Every director, officer, shore-based and seafaring employee, and contract worker of an Altera entity and everyone that we specifically notify as being within the scope of this Policy (collectively, “you” or “Employees”) has the right and responsibility to report suspected wrongdoing without fear of retaliation and with confidence that we will receive and handle the report seriously. The purpose of this Policy is to provide you with information and guidance as to how to report suspected wrongdoing and how Altera will handle such reports.

2. Scope

This Policy covers the reporting of compliance and ethics concerns, aligns with the Altera Code of Conduct, and applies to all Altera entities and Employees.

3. Policy and Requirements

3.1. Policy Statement

Altera shall maintain procedures to allow for its Employees to anonymously report compliance and ethics concerns and to ensure that such reports are properly received, retained, and handled.

3.2. Compliance and Ethics Concerns

Compliance and ethics concerns (“concerns”) are activities, dangers, or individual behaviours in relation to Altera operations or business activities that are suspected to be in violation of our Code of Conduct or applicable law. This may include matters related to asset misappropriation and theft, bribery and corruption, conflicts of interest, financial statement fraud, Health safety, and environment (HSE) risks, human rights, retaliation, workplace misconduct (including discrimination, harassment and bullying, violence, sexual harassment, and other behaviours that lead to an inhospitable working environment), and any other breach of legal or professional obligations.

3.3. How to Report Concerns

Employees are encouraged to report concerns or questions about business conduct internally to their direct team leader, their HR representative, the designated person ashore (“DPA”) for their

vessel, the Legal or Compliance function, or to the Altera Infrastructure Reporting Hotline (the “Reporting Hotline”; available at <https://www.alterainfra.ethicspoint.com>).

The Reporting Hotline is an independently managed, secure reporting service that is available for the submission of reports all day, every day. The Reporting Hotline is available to Altera’s Employees as well as external stakeholders, such as customers, suppliers, and members of the community. Where permitted by law, reports to the Reporting Hotline may be submitted anonymously. Concerns reported to the Reporting Hotline are registered and documented by the independent system manager, and then made available to Altera for handling.

We encourage Reporters not to report concerns anonymously, because completely anonymous reports are harder to assess and investigate. If you are concerned about the risk of retaliation, we encourage you to speak to your HR representative or the Altera Chief Compliance Officer to ensure appropriate measures are taken to protect the confidentiality of your identity in the handling of your report. Nothing in this Policy is intended to prevent any Reporter from reporting information to applicable law enforcement agencies when such Reporter has reasonable cause to believe that a violation of law has occurred.

3.4. Handling of Reports

The Chief Compliance Officer and the Director Risk and Audit Services are responsible for reviewing, assessing, and handling reports made under this Policy and may, at their discretion, delegate all or a portion of these responsibilities to other appropriate parties within Altera or to third parties (including outside counsel or advisors).

Reports made under this Policy shall be handled professionally and confidentially (except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law), in accordance with applicable law and the Altera Global Investigations Standard. Reports, investigations, and the outcomes thereof shall be documented, retained, and kept confidential in accordance with and to the extent permitted by applicable law.

3.5. Non-Retaliation and Malicious Acts

We strictly prohibit Retaliation of any kind against Reporters who report concerns under this Policy in good faith, i.e., with a sincere effort to report accurate information, even if the report does not turn out to be an actual violation of the Altera Code of Conduct, Altera Policy, or applicable law. Employees who are found to have engaged in such Retaliation will face disciplinary action up to and including termination for cause, and in the case of directors, removal from the board of directors to which they are appointed.

Employees and other Reporters who feel they have been the victim of retaliation should report this to their direct team leader, business unit HR function, or the Altera Infrastructure Reporting Hotline immediately.

Employees who are found to have reported concerns in bad faith (i.e. in the knowledge that the matters they reported were false or with reckless disregard for the truth of the matters reported) will face disciplinary action up to and including termination for cause, and in the case of directors, removal from the board of directors to which they are appointed.

3.6. Communication

This Policy and any relevant Altera requirements shall be communicated internally to Employees via training and ongoing corporate communications, as necessary and appropriate. Information and instructions regarding the Reporting Hotline are also contained in the Altera Code of Conduct, which Employees must read and acknowledge upon joining Altera and must re-certify periodically thereafter.

3.7. Internal Reporting Obligations

At least annually, the Altera Chief Compliance Officer will report to the Audit Committee of the Board of Directors of Altera Infrastructure GP L.L.C. (the "Audit Committee") on the number and general nature of reports made under this Policy and, as necessary according to the severity of any given report, the details and status of related investigations. The Altera Chief Compliance Officer will notify the Chair of the Audit Committee of reports of serious misconduct as soon as reasonably possible.

4. Terms and Definitions

Altera / Group / We / Us	Altera Infrastructure L.P., its subsidiaries, controlled affiliates, and its general partner, Altera Infrastructure GP L.L.C.
Audit Committee	Audit Committee of the Board of Directors of Altera Infrastructure GP L.L.C.
Board	Board of Directors of Altera Infrastructure GP L.L.C.
Compliance and ethics concerns / Concerns	Activities, dangers, or individual behaviours in relation to Altera operations or business activities that are suspected to be in violation of our Code of Conduct or applicable law. This may include matters related to asset misappropriation and theft, bribery and corruption, conflicts of interest, financial statement fraud, health safety, and environment (HSE) risks, human rights, retaliation, workplace misconduct (including discrimination, harassment and bullying, violence, sexual harassment, and other behaviours that lead to an inhospitable working environment), and any other breach of legal or professional obligations.

Employee / You	Any director, officer, shore-based or seafaring employee, or contract worker of an Altera entity and any other individuals that we specifically notify as being within the scope of this Policy.
May	Used to indicate a discretionary choice.
Must / Shall / Will	Used to indicate a non-discretionary directive or requirement.
Reporter	A natural person who reports compliance and ethics concerns, whether or not an Employee.
Retaliation	Any act or omission occurring in a work-related context and which causes detriment to the reporter or to the legal entity that the reporting person owns, works for, or is otherwise connected with in a work-related context.

5. Roles and Responsibilities

Board	Responsible for review and approval of this Policy.
Audit Committee	Responsible for review of this Policy and for issuing a recommendation to the Board regarding approval thereof. Further responsible for oversight of the manner in which Altera investigates concerns reported under this Policy.
Chief Compliance Officer	As assigned by the Audit Committee, primarily responsible for administering and maintaining this Policy, including for handling and investigation of reported concerns. May, at his/her discretion, delegate or assign all or part of the responsibility for ensuring substantive compliance with this Policy to other Employees, functions, or departments, or to external advisors, but shall at all times remain ultimately responsible for compliance.
Director Risk and Audit Services	Assigned by the Audit Committee to assist the Chief Compliance Officer in administering and maintaining this Policy.
Employees	Responsible for adhering to the requirements of this Policy and any supporting Altera requirements.

6. Deviations

No exemptions from this Policy or associated Altera requirements may be granted unless there are exceptional circumstances, or this Policy or other requirements are obviously not applicable. All requests for exemptions must be made in writing to the Altera Chief Compliance Officer. Exemptions will only be granted if the Altera Chief Compliance Officer, Altera General Counsel, and the Chair of the Audit Committee agree. Exemptions must be duly documented.

7. Revision

This Policy shall be reviewed and approved by the Board at least once annually. The Altera Chief Compliance Officer may also propose revisions to this Policy as needed, but any substantive changes must be recommended for approval by the Audit Committee and approved by the Board.

8. Enforcement

Compliance with this Policy and associated Altera requirements is mandatory. Violations will be considered misconduct and may result in disciplinary action up to and including termination for cause, and in the case of directors, removal from the board of directors to which they are appointed. Where events warrant, action in violation of this Policy or associated Altera requirements may also be reported to relevant authorities. Violations will be assessed and handled on a case-by-case basis in line with Altera policies and procedures.

9. Associated Altera Requirements

- Altera Code of Conduct
- Altera Global Investigations Standard