



STANDARDS OF BUSINESS CONDUCT POLICY



CONTENT:

BACKGROUND 3

- Why Seapeak Has Standards Of Business Conduct 3
- How To Use The Standards Of Business Conduct 3
- Compliance With Law 4

ANTI-CORRUPTION AND ANTI-BRIBERY..... 4

- What Is Bribery? 5
- Gifts And Hospitality 5
- Record-Keeping 7
- Due Diligence 9
- What To Do If You Encounter Bribery Or Corruption? 9

FRAUD 10

ANTI-MONEY LAUNDERING INVESTIGATION & FOLLOW UP 12

- What happens once a report of a Suspected Violation is received? 12
- Tax Evasion 13

COMPANY ASSETS AND INFORMATION..... 13

- Privacy And Personal Data 13
- Company Information 14
- Company Property 15
- Use Of Information Technology 15
- The Workplace 15

CONFLICTS OF INTEREST..... 16

- Political And Charitable Activities 17

SANCTIONS AND TRADE CONTROLS 17

- Sanctions 17
- Trade Controls 18

MODERN SLAVERY 18

UNITED NATIONS 18

- Global Compact on Human Rights 18

COMMUNITY 19

- Citizenship And Community Service 19
- Sustainability 19
- Environment 20

COMPLIANCE WITH THE STANDARDS OF BUSINESS CONDUCT 20

- Administration And Enforcement 20
- Resources For Guidance And Reporting 21

BACKGROUND

Seapeak Core Value: INTEGRITY

We are open and honest, and lead by example. We build trust with others and are trustworthy. We admit our mistakes and use them as an opportunity to improve our skills and processes.

Why Seapeak Has Standards Of Business Conduct

As responsible business leaders, it is not enough to succeed; it is important to succeed with integrity. Our business decisions and actions must be ethical and in full compliance with legal requirements. These Standards of Business Conduct (“Standards”) are an extension of our Seapeak Core Values and reflect our continued commitment to manage our business activities with integrity.

How To Use The Standards Of Business Conduct

These Standards summarize the regulatory requirements and business practices that guide our decision-making and business activities. These Standards contain basic information about our policies as well as information on how to

obtain guidance regarding a particular business practice or compliance concern. It is important that all Seapeak group employees take the time to review this document and make a commitment to uphold its requirements. To the extent that Directors are involved in activities relating to the business of Seapeak, these Standards also apply to them. Although these Standards do not cover the full spectrum of employee activities, they are indicative of Seapeak’s commitment to maintain high standards of ethical conduct and are considered to be descriptive of the type of practices expected from employees in all circumstances. These Standards do not replace other more detailed policies and guidelines. Divisional or local policies will generally provide additional detail to these Standards or cover a situation specific to a particular location or business unit. If a divisional or local policy conflicts

with these Standards, these Standards shall take precedence.

Compliance With Law

Seapeak is aware of and strictly obeys the laws and regulations that govern the management of our business. Where there are local laws or regulations in the various jurisdictions that we operate – our position is to meet or exceed these requirements. We are responsible

for understanding these laws and regulations as they apply to our jobs and for preventing, detecting and reporting instances of non-compliance to the Chief Compliance Officer

“There are no circumstances at Seapeak that would allow us to disregard any law or regulatory requirement in the conduct of our business and no such activity will be tolerated.”

ANTI-CORRUPTION AND ANTI-BRIBERY

It is our policy to conduct all of our business with integrity. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and in an honest and ethical manner in all our business dealings and relationships wherever we operate or propose to operate, and to implementing and enforcing effective systems to counter bribery and corruption. We do not pay bribes in the furtherance of our business and expect that you will not do so on our behalf. We will uphold all laws relevant to countering bribery and corruption in all the

jurisdictions in which we operate, including the UK Bribery Act 2010 (the “**Bribery Act**”) and the United States Foreign Corrupt Practices Act of 1977, as amended (the “**FCPA**”) and any other applicable laws, statutes, regulations or codes of other countries relating to anti-bribery or anti-corruption (collectively referred to as “**Anti-corruption Legislation**”). Penalties and fines under these laws can be severe.

What Is Bribery?

A “bribe” is an inducement, advantage, benefit or reward of any kind offered, promised or provided, either directly or through an intermediary, in order to improperly influence a decision, act/ omission, or, to improperly facilitate or expedite a routine function by the party concerned.

Gifts And Hospitality

The provision or receipt of Gifts and Hospitality, often considered a customary business courtesy, may in some cases constitute disguised bribery. If Gifts and Hospitality are given or received for an improper purpose, this is bribery. Seapeak has established a Gift and Hospitality policy below to help you to distinguish between permissible and impermissible Gifts and Hospitality.

Glossary:

“**Gifts**” mean any benefit / item of value not otherwise defined as Hospitality including mementos, promotional items and merchandise.

“**Hospitality**” means any hospitality, meal, travel, hotel/lodging, or entertainment of any kind (including

sporting, cultural, recreational activities and tickets to events).

“**Public Official**” means any officer or employee of a foreign government or any department, agency, or instrumentality thereof, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organization including officers and employees of state-owned companies/enterprises.

- The giving or receiving of Gifts and Hospitality must be reasonable and appropriate and in accordance with these Standards and applicable law.
- Gifts and Hospitality must be for a proper and legitimate business purpose (and must never involve the pursuit of an unfair business advantage).
- The giving or receiving of Gifts and Hospitality must be done openly and in Seapeak’s name.
- Gift and Hospitality expenses must be properly documented. Receipts should include reasonable details including the expenditure amount and information about the attendees (e.g., name, company and position).

- The giving or receipt of cash or cash equivalent gifts is never appropriate and is prohibited.
- The giving or receipt of Gifts and Hospitality is subject to the preapproval requirements set forth in Table 1 following (note that special guidance applies to Public Officials).
- In assessing whether Gifts and Hospitality expenses are appropriate, err on the side of caution and avoid any appearance of impropriety. Ask yourself if you would be comfortable explaining the Gift and Hospitality to colleagues, supervisors, clients or outside parties.
- Always avoid or decline Gifts and Hospitality which could cause embarrassment or disrepute to Seapeak.
- Keep in mind that the overly frequent giving or receipt of Gifts and Hospitality may be considered a violation of these Standards if the overall impact and frequency of the giving or receiving of such Gifts and Hospitality is excessive or if it is done to avoid or circumvent the spirit or intent of the requirements set out in these Standards.
- You should avoid giving/receiving Gifts and Hospitality in connection with important business decisions, e.g., in connection with a tender process or prospective contract or award. You must never give /receive Gifts and Hospitality if it could improperly influence a business decision or give a credible appearance of impropriety.
- Where a contract requires Seapeak to bear the travel/accommodation costs of another party, these costs should be reasonable, related to a legitimate business purpose (e.g., meetings or visits to monitor a project) and done in accordance with the terms of the contract.
- Do not offer Gifts and Hospitality to others if you know or suspect that it would violate their own corporate policy.
- If you encounter any situation in which Gifts and Hospitality are received or are given in violation of Seapeak's Standards, you must immediately report the matter.
- If you have any doubt about whether any Gift or Hospitality (especially if Public Officials are involved) is proper, refer the matter to the Chief Compliance for guidance.



Record-Keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments or providing gifts or hospitality to third parties.

Accordingly, you must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with this Policy, and the Travel and Expense.

Table 1

| Giving/Receiving | Manager Pre-Approval Required | CCO Pre-Approval Required |
|---|---|---------------------------|
| Corporate promotional items/ business commemoration Gifts ≤ US\$ 50/ person | No | No |
| Corporate promotional items/ business commemoration Gifts > US\$ 50/person ≤ US\$ 150/person | Yes. Manager to notify any concerns to CCO. | No |
| Corporate promotional items/ business commemoration Gifts > US\$ 150/person | Yes | Yes |
| Hospitality ≤ US\$ 250/person | No | No |
| Hospitality > US\$ 250/person ≤ US\$ 500/person | Yes. Manager to notify any concerns to CCO. | No |
| Hospitality > US\$ 500/person | Yes | Yes |
| Public Officials (see Glossary for definition) | | |
| <p>The giving/receiving of Gifts and Hospitality to/from any Public Official is not permitted except for the giving/receiving of Hospitality to/from employees of state-owned companies with your manager's pre-approval; provided always that the proposed Hospitality must be reasonable, for a proper purpose in connection with legitimate business activities, and otherwise in compliance with this policy.</p> <p>If the proposed Hospitality is > US\$ 500 person, CCO pre-approval must also be obtained.</p> | | |

Explanatory Notes:

- This is a pre-approval table. Reimbursable expenses must always be documented, processed and approved by your manager in line with usual signing authorities.
- Nothing in this table is intended to authorise the giving or receiving of gifts for improper purposes. The monetary limits stated above do not imply that amounts below the threshold are proper or reasonable. Gifts and Hospitality must always be reasonable in the circumstances and must never be given/received in expectation of an improper business advantage. The monetary limits are intended to be used as a risk-based threshold for prior review screening.
- If any expense is incurred /received above a prescribed limit without pre-approval, the event/circumstances must be promptly reported to the applicable manager. The manager must notify any concerns to the CCO.
- Concerns that may need to be notified to the CCO pursuant to this table include, by way of example, involvement of Public Officials, excessive value of expense, existence of competitive tender or imminent business decision and any other factor signaling a red flag or risk of misconduct.

Guidelines and specify the reason for the expenditure in reasonable detail. All

accounts, invoices, memoranda and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts may be kept “off-book” to facilitate or conceal improper payments. In many cases the covering up of a transaction or omission to report a transaction that violates an applicable Anti-corruption Legislation by mischaracterizing it on the Seapeak’s books and records (such as an expense account) is a separate offence under such legislation. Payments may only be made to approved vendors and legitimate bank accounts.

Due Diligence

Seapeak and any person acting on its behalf must take all necessary precautions to ensure that business relationships are formed with reputable and qualified third parties. Seapeak has developed a due diligence process to evaluate potential partners, agents, representatives, suppliers and other business parties which involves a risk assessment, completion of an

information questionnaire and in some cases further external due diligence procedures. In accordance with Seapeak’s due diligence procedures, the contract which formalizes the business arrangement must also include business ethics clauses approved by Seapeak’s Legal Department. Third parties are never permitted to pay bribes on our behalf. Additional information can be found on Seapeak’s Global SharePoint site or by contacting Legal or the Chief Compliance Officer.

What To Do If You Encounter Bribery Or Corruption?

You must tell your manager and the Chief Compliance Officer or the Chair of the Audit Committee if you receive a corrupt demand or encounter bribery or corruption. Alternatively, you may make a report confidentially and anonymously¹ to Seapeak’s Integrity Line if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you have encountered another form of unlawful activity. Seapeak’s Integrity Line (phone and web based

¹ Subject to local laws, data privacy regulations, and legal disclosure requirements, which may in some jurisdictions and

circumstances limit or restrict the availability and scope of anonymity.

versions) is available in all major languages. The link to Seapeak's Integrity Line is available at www.Seapeak.com or the direct link: <https://www.integrity.Seapeak.com> You may take reasonable measures to protect yourself from any reasonably apprehended/unavoidable threat to your life, limb or liberty. If you are

left with no alternative but to pay or give something of value in order to protect against loss of life, limb or liberty, please make a report immediately to the Chief Compliance Officer. In the case of vessel masters, discuss the situation directly with the on shore vessel manager and report the item in accordance with Polaris policy SP1446

FRAUD



The prevention, detection and reporting of fraud is the responsibility of all employees of Seapeak. Employees in management positions are further expected to be familiar with the types of improprieties that might occur within their areas of responsibility, and to be alert for any indication of fraud or irregularity. "Fraud" is defined as an intentional, false representation or concealment of facts for the purpose of personal or

corporate gain. Actions constituting fraud include, but are not limited to:

- Misappropriation of funds, securities, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Intentional fraudulent reporting of the company's financial position;
- Profiteering as a result of insider knowledge of company activities;



- Falsifying invoices or other records;
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; or,
- Any similar or related inappropriate conduct.

Employees who detect or suspect a fraud has occurred must report the incident immediately either directly to their manager, or a member of Internal Audit. Alternatively, employees may report suspected instances of fraud confidentiality and anonymously² to Seapeak's Integrity Line. All information received will be treated confidentially to the extent possible while still allowing a full investigation to be conducted into the suspected fraud. Seapeak reserves the right to pass on any information to law enforcement agencies in order that such entities may determine whether criminal charges are warranted. Any employee who suspects dishonest or fraudulent activity should not attempt to:

- a) personally conduct investigations or interviews/interrogations related to any suspected fraudulent act; or,

- b) contact the suspected individual in an effort to determine facts or demand restitution.

Internal Audit has the primary responsibility to coordinate the investigation of all suspected fraudulent acts reported under this Policy. If the investigation substantiates that fraudulent activities have occurred, Internal Audit will issue reports to appropriate management personnel and to the Board of Directors through the Audit Committee. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/ title, or relationship to Seapeak. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the General Counsel. No information concerning the status of an investigation should be given out by persons involved in or aware of the investigation. The proper response to any inquiry is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the

² Refer to footnote 1.

misappropriation,” or any other specific reference.

Based on the results of the investigation, management will determine an action plan for employee discipline, any referral to the applicable law enforcement agency and/or changes to processes or controls. Decisions to prosecute

either employees or external parties by way of civil proceedings or to refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in consultation with the General Counsel and senior management, as will any final decisions on the disposition of the case.

ANTI-MONEY LAUNDERING INVESTIGATION & FOLLOW UP

What happens once a report of a Suspected Violation is received?

Money laundering involves the use of proceeds of crime and/or the concealment of the criminal origin of money or assets within a legitimate business or business activities. Anti-money laundering laws are strict and may operate to impose criminal liability on any company or individual employee that assists in or enables money laundering to occur. No Seapeak personnel shall be involved in or facilitate money laundering. All Seapeak personnel have a duty to report any such

suspicious activity to the Chief Compliance Officer. The following is a non-exhaustive list of “red flag” examples which are indicative of potential money laundering:

- Any transactions where the basic details of the parties cannot be checked or verified.
- Payments that are made in currencies other than that specified in the invoice, contract or purchase order.
- Attempts to receive or make payments in cash or its equivalents, such as cashier cheques.
- Requests to make overpayments.

- Transactions that are made through unknown or unnecessary intermediaries or transactions that are accompanied by a request for secrecy.
- Transactions related to high risk countries, as defined by the international governmental FATF (Financial Action Task Force), see www.fatf-gafi.org/countries/#high-risk.
- Requesting to make or making any sizable in cash payments.

taxes including acts/omissions to defraud tax authorities. No Seapeak personnel shall engage in, or facilitate, criminal tax evasion. In accordance with the U.K. Criminal Finances Act 2017 and other applicable laws Seapeak maintains reasonable and proportionate procedures for the prevention of tax evasion/ facilitation of tax evasion. Seapeak personnel must perform risk-based due diligence on new transactions, watch for and report tax evasion red flags and take all appropriate steps to prevent tax evasion risks in connection with Seapeak transactions

Tax Evasion

Criminal tax evasion involves the intentional evasion of lawfully owed

COMPANY ASSETS AND INFORMATION

Privacy And Personal Data

Seapeak will abide by all applicable legal requirements protecting the privacy of personal information. We must all ensure that appropriate processes and systems are in place to safeguard access to this type of information.



We respect sensitive information and protect its security,



confidentiality and integrity. All personal information is confidential and may not be disclosed except as permitted by law and applicable regulations.

Access to personal information is strictly controlled on a 'need to know' basis and is used for legitimate business purposes only.

Seapeak's Personal Information Privacy Policy (Global Policies/Legal), which conforms to applicable legislation including the E.U.'s General Data Protection Regulation (GDPR), sets out further information on Seapeak's data privacy requirements.

Integrity Individually and collectively, our personal integrity supports the honest use of time, funds and property in ethical dealing with employees and others. Business needs take priority in the allocation of our time at work. Use of company time and property is for Seapeak business purposes only unless otherwise authorized by management. We consciously set high standards of courtesy, professionalism, respectfulness and honesty in our interactions with our customers, shareholders, suppliers, employees and the community. We establish and maintain an ethical

workplace. We treat people fairly and respect human rights. We take allegations of harassment and unlawful discrimination seriously and address all such concerns that are raised regarding these policies.

Company Information

In the course of employment with Seapeak, employees are provided with access to certain records, reports, processes, plans, bids, proposals, and other documents, databases or software that are considered to be proprietary or confidential information. Unauthorized disclosure or misuse of this information could have serious consequences. For example, we could be placed at a competitive disadvantage, our financial stability could be affected, we could be exposed to legal liability, or, our reputation could be compromised. Employees are therefore prohibited from discussing or disclosing any confidential information with any external party unless properly authorized to do so. Confidential information should only be shared within Seapeak on a "need to know" basis. These confidentiality requirements remain in effect during and after employment with Seapeak. Where authorization for disclosure



of information to a third-party has been given, the employee involved must ensure that an appropriate confidentiality or non-disclosure agreement has been executed. Communications or files created by an employee during the course of business are the property of the company and not the private property of the employee. The company may, at any time, bypass applicable personal passwords to inspect, investigate or search computerized files or email if it is deemed to be in our best interests to do so or if required by law.

Company Property

Any employee who possesses or is provided with access to company property shall exercise care while using such property and ensure its proper maintenance, security, handling and operation. An employee may be held financially and/ or criminally responsible for any losses due to fraud or mistreatment of property. Misuse of company property may include personal use, unauthorized removal of property from company premises, use of company property for non-Seapeak business, copying of copyrighted/licensed materials (including software), and

inappropriate use of the property or misappropriation of company funds.

Use Of Information Technology

Use of company provided information technology and the access to its contents are only authorized for legitimate Seapeak business related purposes.

The Workplace

A safe and clean work environment is important to the well being of our employees. Seapeak complies with applicable safety and health regulations and appropriate practices. The company does not tolerate workplace discrimination and harassment. We must all ensure that the company is a safe and respectful environment where a high value is placed on equity, fairness and dignity. Please refer to the Global Employee Conduct Policies and Guidelines for further information on your rights and obligations. Seapeak supports its personnel's rights of freedom of association and collective bargaining and will not seek to limit any lawful exercise of those rights.

CONFLICTS OF INTEREST

All Seapeak employees should avoid any activity that creates an actual or potential conflict of interest, i.e., any situation in which their actions or loyalties are divided between personal interest and Seapeak's interests or between Seapeak's interests and those of another. If you are unsure whether a conflict exists, you should consult Legal or Internal Audit. The following activities are prohibited unless prior approval is received from the General Counsel or Chief Compliance Officer:

- Owning, operating, or being employed by any business that competes, directly or indirectly, with Seapeak;
- Owning greater than 10% of the outstanding shares of a competitor company (public or private);
- Engaging in a business transaction with Seapeak except in connection with our regular employee programs;
- Having a direct or indirect personal financial relationship with a competitor, customer, or supplier (this does not include the purchase of publicly traded shares unless a controlling or significantly influential interest is acquired);
- Being on the Board of Directors of a for profit company (particularly a competitor);
- On Seapeak's behalf, awarding a contract or entering into any other financial transaction with a former employee or family member;
- Engaging in any other employment or extensive personal projects during work hours, or using Seapeak property in other employment;
- Soliciting or entering into any business or financial transaction with an employee you supervise, either directly or indirectly and/or any other inappropriate or importunate solicitation directed at other Seapeak employees; and,
- Solicitation and distribution of materials by a third party to Seapeak employees on company property, without previous authorization from a senior manager of the department/division.

In addition, you should obtain your supervisor's approval before joining

an industry organisation as a representative of Seapeak.

Political And Charitable Activities

Seapeak does not make political contributions. Seapeak personnel must not make political contributions on behalf of Seapeak and/or join or engage in political

activities in Seapeak's name. Seapeak actively supports and encourages charitable activities. However, before any charitable donation is made on behalf of Seapeak, Seapeak personnel must obtain appropriate internal approvals and make appropriate due diligence enquiries to verify the legitimacy of the intended recipient.

SANCTIONS AND TRADE CONTROLS

Seapeak and its subsidiaries and affiliates are committed to conducting their business in compliance with U.S. and other national laws and regulations that are applicable to transactions regarding sanctioned countries. These activities will be conducted in a manner that is consistent with the company's values, ethical standards and commitment to legal compliance.

Sanctions

Sanctioned Countries are countries or occasionally government authorities subject to embargos imposed by the U.S., EU, UN or other applicable authorities. A routinely

updated list of U.S. Sanctioned Countries and designated individuals can be found on the website of the U.S. Treasury Department at www.treas.gov. No Seapeak business unit or employee, regardless of location, will engage in any dealing with a country, entity or designated individuals subject to embargoes or trade sanctions without advance documented approval from the Chief Compliance Officer or Legal Department. The Legal Department will determine when it is appropriate to seek regulatory approval(s) for a transaction involving a sanctioned country, entity or person. All relevant documentation must be maintained according to the government license authorizing the

transaction or the company's Records Retention Policy, whichever is longer. The Seapeak Legal Department should be consulted with respect to any transactions that may involve sanctions.

Trade Controls

Many jurisdictions in which Seapeak operates have customs, trade and

financial controls to regulate the movement of goods, equipment, funds and property including technology and software. Whenever moving such items between jurisdictions Seapeak personnel must ensure they complete the required paperwork and properly declare goods in transit.

MODERN SLAVERY

Modern Slavery involves the deprivation of a person's liberty by another to exploit them for gain either personally or commercially. Seapeak is committed to a zero tolerance approach towards modern slavery in its business dealings and relationships. Seapeak has implemented a program to provide reassurance that modern slavery is not taking place within the company or its supply chain. Elements of the program include the following:

- Recycling policy for vessels;
- Appropriate risk-based due diligence;
- Compliance and awareness training;

- Contract clauses ensuring business ethics compliance; and
- Annual compliance reporting.



UNITED NATIONS

Global Compact on Human Rights

Seapeak, as a signatory to the United Nations Global Compact, respects

and actively supports all internationally proclaimed human rights in relation to labour/child labour, the environment, and anti-corruption. Seapeak is committed to undertaking all appropriate due diligence and follow up to prevent

and address any human rights violations in connection with Seapeak's business, including in its supply chain.

COMMUNITY

Citizenship And Community Service

The improvement of society as well as the communities we serve and in which we operate is important to us. We encourage the support of charitable, civic, educational and cultural causes. Every Seapeak employee should be aware, however, that if he/she seeks appointment or election to public office such activity might create an actual or potential conflict of interest. As above, if you are unsure whether seeking public office might create such an actual or potential conflict, you should consult with your supervisor, the Chief Compliance Officer or a member of the Legal department.



Sustainability

Seapeak is committed to conducting its business and operations in a sustainable manner to safeguard and promote employee health and wellness, operational leadership, corporate social responsibility, emissions reductions, responsible ship recycling and supply chain management, and reporting and tracking of Environmental, Social and Governance (ESG) objectives. Further details may be found in Seapeak's Sustainability Report.



Environment

Seapeak is committed to the protection of the environment. To comply with this commitment, our policy is to meet or exceed all applicable laws and regulations.

Employees must report any occurrence that is a breach of any law or regulation relating to the protection of the environment.

COMPLIANCE WITH THE STANDARDS OF BUSINESS CONDUCT

These Standards provide the overarching guidelines for business practices and regulatory compliance for all Seapeak entities and all Seapeak employees. Seapeak does business globally, and our business operations are subject to the laws in different countries. Failure to read and/or acknowledge these Standards does not exempt an employee from his/her responsibility to comply with these Standards, applicable laws, regulations and all Seapeak policies and procedures that are related to his/her job.

Administration And Enforcement

Seapeak's Internal Audit department is responsible for compliance auditing of these Standards. Violations of these Standards will not be tolerated. Consequences for such violations may include disciplinary action up to and including termination of employment. Before any disciplinary action is taken, the Human Resources Department should be consulted to ensure the fair and consistent application of any disciplinary measures. Employees who have willfully failed to report a violation of these Standards may also be subject to disciplinary action.



Resources For Guidance And Reporting

It is your right and responsibility to obtain guidance about a business practice/and or compliance issue when you are uncertain about what action you should take and to report instances of questionable behavior and/or possible violations of these Standards. If you become aware of any suspected violation of these Standards, report such suspected violation promptly to the Chief Compliance Officer or report it confidentially and anonymously³ to Seapeak’s Integrity Line using the contact details in the table below.

Report Violations! Most misconduct is uncovered by employees just like you.

Do your part to help by reporting suspected fraud, bribery, irregular accounting or other violations of the Standards of Business Conduct Policy. If you wish, reporting may be done confidentially and anonymously⁴ at these numbers

| | |
|----------------|-------------------|
| Bahrain | 800 06 488 |
| Belgium | 0800 260 39 |
| Bermuda | 1-855-579-9534 |
| Canada | 1-800-235-6302 |
| China | 400 120 3062 |
| Denmark | 8082 0058 |
| India | 000 800 100 4175 |
| Japan | 0800-170-5621 |
| Korea | 080 880 0476 |
| Luxembourg | 800-27-311 |
| Netherlands | 0-800-022-0441 |
| Philippines | 2 86263049 |
| Russia | 8-800-100-9615 |
| Singapore | 800-852-3912 |
| Spain | 900 905460 |
| United Kingdom | 0 808 189 1053 |
| United States | 1-800-461-9330 |

³ Refer to footnote 1.

⁴ Refer to footnote 1.