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## 1.0 Purpose

This International Trade Compliance Policy (“Policy”) encompasses the commitment expressed in Enterprise’s Code of Conduct to comply fully with all applicable laws and regulations that regulate international trade. For purposes of this Policy, the term “Enterprise” means Enterprise Products Partners L.P. and its affiliates and subsidiaries. International trade laws govern the cross-border flow of commodities, technology and services, as well as international business transactions. The purpose of this Policy is to ensure our compliance with these international trade laws when we are subject to them. References to “law” or “laws” in this Policy are intended to include applicable regulations.

Failure to comply with applicable international trade laws can limit Enterprise’s ability to import and export and can potentially expose Enterprise to administrative, civil, and criminal penalties. Enterprise retains the right to discipline (up to and including termination of employment), or end working relationships with, those who do not comply.

## 2.0 Applicability

This Policy applies to officers, directors, employees, independent contractors, consultants and representatives of Enterprise (“Enterprise Personnel”), each of whom is expected to comply with this Policy to the extent applicable and all applicable legal and regulatory requirements.

Pursuant to this Policy, Enterprise may create requirements or procedures that further detail specific compliance obligations. All Enterprise Personnel must familiarize themselves with any international trade laws and compliance requirements and procedures that apply to their job functions and participate in any international trade compliance training required by Enterprise.

## 3.0 Area of Compliance

This Policy reflects Enterprise’s commitment to compliance, with a special focus on five specific areas: **Customs and Import Controls; Export Controls; Economic Sanctions; Anti-Boycott and Anti-Bribery Laws**. Activities in these areas may be obvious – such as the importation of commodities – or less apparent – such as the transfer of knowledge to foreign nationals. Enterprise is fully committed to developing, maintaining and complying with requirements and procedures focused on each of these areas of international trade law.

### A. **Customs and Import Controls**

It is Enterprise’s policy to comply with all applicable customs and import controls laws of the countries into which it imports, including the United States. Such laws include the customs laws of the United States, implemented and enforced by U.S. Customs and Border Protection and U.S. Immigration and Customs Enforcement. They also include related

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import controls laws that apply to natural gas, crude oil, natural gas liquids, petrochemical and refined products, such as laws implemented and enforced by the U.S. Departments of Commerce and Treasury and the Environmental Protection Agency.

Customs and import controls laws govern most aspects of importing goods into a country including the ability to enter goods and the process for doing so, the classification and valuation of goods, the marking of goods with the correct country of origin, the applicability of free trade agreements, the timely submission and retention of required documents and the payment of applicable duties, taxes, and fees.

## **B. Export Controls**

It is Enterprise's policy to comply with all applicable laws that govern the exportation, re-exportation, and transfer of goods, services, technology, and information. Such laws include export controls laws under the Export Administration Regulations, as administered by the U.S. Department of Commerce's Bureau of Industry and Security, the Foreign Trade Regulations, as administered by the U.S. Census Bureau, and the International Traffic in Arms Regulations, as administered by the U.S. Department of State's Directorate of Defense Trade Controls.

U.S. export controls laws impact the shipment or transfer of U.S.-origin and certain foreign commodities, equipment, parts, or technology to certain foreign countries or foreign end-users. In addition, U.S. export controls laws may restrict the visual, oral, electronic or other intangible "release" of certain technology or proprietary know-how to a non-U.S. national, whether the act occurs within or outside of the United States. U.S. export control laws require, in most cases, the routine reporting of exports pursuant to the Foreign Trade Regulations as administered by the U.S. Census Bureau.

## **C. Economic Sanctions**

It is Enterprise's policy to comply with all applicable U.S. and foreign country economic sanctions laws. The United States maintains economic sanctions of varying degrees against certain countries, territories, persons, and entities, based on foreign policy and national security concerns.

These measures include list-based sanctions against individuals and entities associated with international terrorism, drug trafficking, proliferation of weapons of mass destruction, human rights abuses, corruption, and other areas of foreign policy or national security concerns. Enterprise is committed to screening all parties involved in its transactions against lists of persons and entities subject to sanctions, including, but not limited to, persons and entities on the U.S. Specially Designated Nationals and Blocked Persons List. Economic sanctions laws prohibit various business dealings with these sanctioned persons and entities owned or controlled by them—including importing from, exporting to, investing in, purchasing from, providing goods or services to, or other transactions with

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these persons and entities. Additionally, U.S. sanctions generally prohibit nearly all transactions involving certain countries or territories subject to comprehensive sanctions. Enterprise will not engage in prohibited business with sanctioned countries, territories, persons or entities.

#### **D. Anti-Boycott**

It is Enterprise's policy to comply with all applicable U.S. anti-boycott laws. The United States maintains laws prohibiting or penalizing conduct that supports certain international economic boycotts, such as the Arab League Boycott of Israel. The U.S. Departments of Commerce and Treasury administer these laws, through the anti-boycott provisions of the Export Administration Regulations and through certain tax-related requirements, respectively, each of which apply to Enterprise. The U.S. Department of Commerce regulations apply to any company organized under U.S. law or controlled by a U.S. company, whereas the Treasury-related requirements apply to all U.S. taxpayers.

The U.S. anti-boycott laws prohibit conduct such as refusing to do business with countries or parties subject to unsanctioned foreign boycotts; discriminating against U.S. persons based on race, religion, sex, or national origin; furnishing information about business relationships with a boycotted country or with blacklisted companies; furnishing information about the race, religion, sex, or national origin of U.S. persons; or knowingly agreeing to do any of the foregoing. These laws require Enterprise to report requests to take actions supporting unsanctioned foreign boycotts. These laws may affect our business dealings, especially those in high-risk anti-boycott regions (for example, the Middle East). Enterprise will not engage in conduct prohibited under the U.S. anti-boycott laws.

#### **E. Anti-Bribery Laws**

It is Enterprise's policy to comply with anti-bribery laws that apply in the jurisdictions where Enterprise conducts business, including the Foreign Corrupt Practices Act (FCPA). The U.S. Securities and Exchange Commission and the Department of Justice jointly administer the FCPA. Enterprise Personnel are prohibited from requesting, accepting, receiving, promising, offering, authorizing, or providing bribes, improper payments, or anything of value contrary to applicable law.

In particular, Enterprise Personnel are prohibited from engaging in the following activities:

- Giving, promising, or authorizing the giving or offering of anything of value to any person, including foreign officials, in order to obtain or retain any business advantage;
- Contracting with or hiring a family member of a foreign official;

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- Accepting or requesting anything of value from anyone as an inducement to engage in the improper or corrupt exercise of their position or authority with Enterprise; and
- Doing anything to induce, facilitate, or permit any third party agent, such as an international commercial representative, consultant or broker, to engage in the above prohibited activities, including providing payments to third party agents while knowing or suspecting that payment will be passed along to a foreign official.

A *foreign official* includes any employee, officer or agent of a foreign government, including an entity controlled by a foreign government (e.g., a state-owned national oil company), any foreign political party, official, or candidate, any official or employee of a public international organization, and any immediate family members of the previously noted.

To the extent permitted by applicable law, payments may be allowed to facilitate or expedite insubstantial "routine governmental action," such as the delivery of mail, police protection, processing a work visa or passport and obtaining permits, licenses or other official documents. Foreign officials who are current or potential customers, suppliers or joint venture partners may be provided with reasonable travel and/or entertainment, as long as it is legal and a bona fide business expense that is compliant with Enterprise's policies. Reasonable travel, entertainment or lodging expenses that are directly related to the promotion, demonstration, or explanation of Enterprise's services, or connected to the performance of a contract are generally acceptable. Promotional items of insignificant value bearing Enterprise's logo are acceptable. Expenses for a foreign official's side trips, sightseeing or vacations in connection with travel for business are prohibited and must be paid by the foreign official.

Prior consultation, review, and written approval of Enterprise's General Counsel or EVP of Accounting, Information Technology & Risk is required for any payment, gift, expenditure, or other activity that could appear inconsistent with these general prohibitions. Such approval may be granted, under limited circumstances, if Enterprise's General Counsel or EVP of Accounting, Information Technology & Risk determines that it is lawful and not prohibited under the FCPA or any other applicable law.

Enterprise must maintain effective internal controls and keep books, records, and accounts that accurately and fairly reflect all transactions. No Enterprise Personnel shall falsify or conceal any business transaction. Payments, expenses and gifts must be documented. Payments for services rendered, including reimbursement of expenses, will be made solely and directly to the government agency or instrumentality employing the foreign official by way of its authorized bank account, except that in an emergency, direct payment to a foreign official is allowed if necessary to ensure the health or safety of the individual conducting business on behalf of Enterprise. Permitted facilitating or emergency payments made to a foreign official when there is no time to seek preapproval from Enterprise's General Counsel or EVP of Accounting, Information Technology & Risk must be reported to

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Enterprise's General Counsel and EVP of Accounting, Information Technology & Risk promptly for specific account coding instructions.

#### **4.0 Enterprise Personnel Responsibilities**

Enterprise expects Enterprise Personnel to take all necessary steps to understand and comply with, and help Enterprise comply with, applicable international trade laws and this Policy. As a part of this Policy, it is the responsibility of Enterprise Personnel to:

- Obtain information and training on international trade laws that impact their job;
- Comply with Enterprise requirements and procedures regarding international trade transactions including the applicable provisions covered by the Enterprise Code of Conduct;
- Comply with applicable international trade laws;
- Consult with his or her supervisor and seek guidance from Enterprise's General Counsel to resolve questions or concerns;
- Identify and report red flags involving transactions and activities;
- Participate in improving compliance procedures; and
- Report any potential violations of this Policy, Enterprise requirements and procedures, international trade laws, or anti-bribery laws, including the FCPA, to a direct supervisor, Enterprise's General Counsel or to the Enterprise Confidential Hotline (1-844-693-4318), which is available 24/7 and allows you to advise Enterprise of situations that may require investigation or management attention. No individual will be retaliated against in any way for raising a good faith concern about suspected or actual violations of this Policy.