



## VERESEN INC.

### PRIVACY POLICY

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Veresen Inc. and all wholly-owned subsidiary partnerships or corporations thereof (Veresen Inc. and all such subsidiaries being herein collectively referred to as the "Company"), are committed to protecting the privacy and confidentiality of personal information of their staff, affiliates, clients and associates. In this policy, personal information means information that reveals a distinctive trait about or helps to identify an individual. It does not include business contact information, including name, position name or title, business telephone number, business address, business email, business fax number and other similar business information or any personal information that is in the custody of or under the control of a public body.

The Company is responsible for personal information under its control and has designated its Senior Vice President, General Counsel as its Privacy Information Officer and the individual who will ensure compliance with this policy.

The Company will comply with the requirements of the *Personal Information Protection Act* (Alberta) ("PIPA") and will use fair and reasonable practices to meet its obligations under PIPA. This policy and additional information are available on request by contacting our Privacy Information Officer using the contact information at the end of this policy.

#### **Purposes of Data Collection**

The purpose of the Company's Privacy Policy is to govern the collection, use and disclosure of personal information by the Company in a manner that recognizes the rights of our clients, partners, employees and other stakeholders to have their personal information protected, while recognizing the need that the Company has to collect, use and/or disclose personal information for purposes that are reasonable in providing the services and products of our business.

#### **Registration**

When one applies to receive information via email alerts, the Company will collect, use and disclose personal information for any of the following purposes:

- advising of opportunities for receiving further information,
- emailing the requested information,
- updating the information for our files on a periodic basis to ensure information is accurate.

By registering, the Company will assume the applicant has consented to the collection, use or disclosure of information as set out above. Should the applicant wish to withdraw consent for the use or disclosure of this information the applicant must so advise the Company. Be aware

that if there is a legal requirement to disclose information which has been collected, withdrawal of consent for such disclosure will have no effect.

### **Complaints**

Any complaints regarding privacy matters at the Company shall be submitted and handled in accordance with the Complaints Procedures attached to this Policy as Schedule "A".

### **Employment**

When applying for employment at the Company, any information provided by a candidate will be used to determine suitability for the position. If the candidate is not hired, the information provided to us during the recruitment process will be destroyed. If the candidate is hired, but employment is subject to a probationary period, and the employment is not successful past the probationary period, the information provided to us will be destroyed. If a candidate is hired, and the individual successfully completes any applicable probationary period, the information will be retained in the individual's employee personnel file.

### **Business Transactions**

When buying or selling a business, the Company may collect, use and disclose personal information without consent, when those involved agree to do so only for the transaction and when they need the information to decide whether to buy or sell. Once the transaction is complete, the organization receiving the personal information may continue to use and disclose it but only for the purposes for which it was originally collected. Further, information must relate solely to the carrying on of the business. If the transaction does not proceed, the organization that received the personal information must destroy or return it.

### **Access to Personal Information**

Individuals may make a written request to the Company's Privacy Information Officer for access to their personal information, the purpose it has or is being used, and persons to whom that information has been disclosed and the circumstances surrounding its disclosure. The Privacy Information Officer will advise whether the Company has a personal information record, whether the Company is providing access to all or part of the record and when and how access will be given, if applicable. An estimate of any cost for access will be provided. Unless s.24 of PIPA states that access to such information need not be provided, access will be provided in 45 days or such longer period allowed for in accordance with PIPA.

### **Correction of Information**

The Company endeavors to maintain accurate, up to date information on individuals. Individuals may make a written/email request to the Privacy Information Officer for the correction of their personal information.

**Security of Information**

The Company does not sell, lease, or trade personal information to other parties. The Company endeavors to ensure strict confidentiality is maintained over personal information. Employees who deal with personal information are trained and required to maintain confidentiality over and safeguard all information used in their positions and comply with this policy.

As well, the Company endeavors to maintain adequate physical, procedural and technical security for its offices, information storage and destruction, electronic files and on-line systems so as to prevent any unauthorized access, disclosure, copying, use or alteration of an individual's personal information.

Paper-based files are stored in secure operating premises. Electronic files are maintained in a secure environment with restricted access. Access to more sensitive files such as employee records, banking information or stakeholder information are restricted to employees who require access to them.

**Questions or Concerns**

Questions or concerns with this policy or personal information should be directed to our Privacy Information Officer:

Veresen Inc.  
Suite 900, 222 – 3rd Avenue S.W.  
Calgary, Alberta T2P 0B4

Attention: Senior Vice President, General Counsel  
Phone: (403) 213-3643  
Fax: (403) 213-3648  
Email: [kking@vereseninc.com](mailto:kking@vereseninc.com)

## SCHEDULE "A"

### PRIVACY POLICY COMPLAINTS PROCEDURES

#### Procedures for Receipt, Retention and Treatment of Complaints Relative to Privacy Matters

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##### **Purpose**

It is the responsibility of Veresen Inc. to ensure appropriate procedures are established for:

- a. the receipt, retention and treatment of complaints received by the Company regarding privacy matters; and
- b. the confidential, anonymous submission by either employees of the Company or any member of the public of concerns regarding privacy matters at the Company.

As a matter of sound corporate governance, these procedures are designed to provide a readily understood, prompt and effective means of addressing such complaints or concerns.

##### **Definitions**

"**Anonymous**" means unknown authorship, and without designation that might lead to information about the authorship. Anonymity is not compromised by assignment of a code or other designation with which a person can communicate without revealing their identity.

"**Complaint**" means any adverse information provided to the Company, whether in the form of a concern, a demand for remedial action, or a report of a suspected violation of law in relation to matters of privacy or Veresen Inc.'s privacy policy.

"**Confidential**" means authorized for access by only those persons who have a need to know. A need to know normally arises from an obligation to investigate or to take remedial or disciplinary action.

## Procedures

### 1. Submission and Receipt of Complaints

- a. Both employees and non-employees may submit Anonymous Complaints.
- b. The Senior Vice President, General Counsel of Veresen Inc., Kevan S. King, is responsible for investigating and resolving all Complaints. Mr. King's direct telephone line is (403) 213-3643 (collect calls are accepted) or he may be contacted by e-mail at [kking@vereseninc.com](mailto:kking@vereseninc.com).
- c. Employees are also free to bring Complaints to their supervisor. Any Complaints so received shall be handled as Confidential and promptly forwarded to the Senior Vice President, General Counsel.
- d. Non-employees may also submit Complaints by mail (or other means of delivery) to the head office of Veresen Inc. marked "Private and Confidential – Attention: Senior Vice President, General Counsel".
- e. Any person making a Complaint is encouraged to provide as much specific information as possible including names, dates, places and events that took place, such person's perception of why the incident(s) may be a violation, and what action such person recommends be taken.
- f. These procedures, including all contact information, shall be posted on Veresen Inc.'s website.
- g. When lodging, responding to, or providing information about a complaint under this Privacy Policy, the Company will collect information necessary for managing the complaint and in these circumstances, information may be collected, used and disclosed without consent but will be used and disclosed in accordance with provisions of the regulations and bylaws as they apply.

### 2. Retention of Records of Complaints

Records pertaining to a Complaint are the property of Veresen Inc. and shall be retained:

- a. in compliance with applicable laws and Veresen Inc.'s document retention policies;
- b. subject to safeguards that ensure their confidentiality and, when applicable, the anonymity of the complainant; and
- c. in such a manner as to maximize their usefulness to Veresen Inc.'s overall compliance or governance programs.

### 3. Treatment of Complaints

- a. All Complaints, whether or not received anonymously, shall be treated as Confidential.
- b. Although a person making an Anonymous Complaint may be advised that maintaining anonymity could hinder an investigation, the anonymity of the complainant shall be maintained, if permitted by law, until they indicate that they no longer wish to remain Anonymous. Any system established for exchanging information with a person making a Complaint shall be designed to maintain anonymity.
- c. The Senior Vice President, General Counsel shall inform the Audit Committee of Veresen Inc., in summary form or otherwise, of all Complaints received, together with an initial assessment as to the treatment of each Complaint.
- d. The assessment, investigation and evaluation of Complaints shall be conducted by, or at the direction of, the Senior Vice President, General Counsel. As deemed appropriate by the Senior Vice President, General Counsel, and at Veresen Inc.'s expense, the Senior Vice President, General Counsel may engage independent advisors including legal counsel or auditors other than Veresen Inc.'s external auditor for the purpose of investigating or remediating any Complaint. All directors, officers and employees of Veresen Inc. have a duty to cooperate in an investigation.
- e. Following investigation and evaluation of a Complaint, the Senior Vice President, General Counsel shall determine any recommended disciplinary or remedial action. Recommendations of the Senior Vice President, General Counsel shall be brought to the Board or to the appropriate members of senior management of Veresen Inc. for authorization and/or implementation. If the action taken to resolve a Complaint is deemed by the Senior Vice President, General Counsel to be material or otherwise appropriate for inclusion in the minutes of the Board, it shall be so noted in the minutes.
- f. The Senior Vice President, General Counsel will regard the making of any deliberately false or malicious allegations by an employee as a serious offence which may result in recommendations to the Board or to senior management of Veresen Inc. for disciplinary action including dismissal for cause and, if warranted, legal proceedings.
- g. Treatment of Complaints shall include taking reasonable and necessary steps to prevent further similar violations.
- h. Any effort to retaliate against any person making a Complaint in good faith is strictly prohibited and shall be reported immediately to the Senior Vice President, General Counsel. Any allegations regarding such

retaliation will be investigated and dealt with in accordance with these procedures.

4. Retention of Records of Complaints and Investigations

The Senior Vice President, General Counsel shall maintain a record of all Complaints, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for the Audit Committee. All Complaints shall be kept on file with the Senior Vice President, General Counsel for a minimum of 12 months and until satisfactorily resolved.

5. Amendments

Veresen Inc. reserves the right to modify or amend these procedures at any time, as it may deem necessary.