PLAINS

SAFETY & ENVIRONMENTAL STEWARDSHIP

TEAMWORK

ENTREPRENEURSHIP & INNOVATION

OWNERSHIP & ACCOUNTABILITY

ETHICS & INTEGRITY

RESPECT, FAIRNESS & INCLUSION

Code of Business Conduct

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Letter from Willie Chiang

Fellow Employees,

Plains began as a concept in the early 1990s. Today, Plains is one of the largest, most profi table and admired midstream energy companies in North America and can legitimately be described as a success story. Our success was made possible by sound vision, a commitment to business fundamentals, prudent capital management and the dedication, hard work and sacrifi ces of our employees – as well as our fair share of luck.

The journey from concept to major industry player was not without a number of signifi cant challenges – some of which tested the very viability of our organization and the character of our leaders and employees. A common thread throughout our history, in both good times and bad, has been our organization's commitment to act with honesty, integrity, fairness and respect.

As we look ahead, it is clear that maintaining and nurturing a culture that is consistent with our Core Values will be key to our long-term success and sustainability as a company. In that regard, in the accompanying Code of Business Conduct we have endeavored to capture our Core Values that govern how we conduct business and engage in relationships with our various stakeholders. Our policies and procedures cannot cover every possible issue or situation that may arise, but our Core Values serve as the foundation of our culture. They provide a compass for addressing any situation or concern, guiding us to always "do the right thing."

In order to sustain our success going forward, a continued commitment to these Core Values is not only a fundamental expectation for each of us individually, but a mission-critical objective for Plains as a company. I look forward to working with you to continuously improve our organization through a culture that is consistent with our Core Values.

Willie Chiang

Chairman, Chief Executive Officer and President

As we look ahead, it is clear that maintaining and nurturing a culture that is consistent with our Core Values will be key to our long-term success and sustainability as a company.

Our Core Values are the foundation of our culture and should serve as a compass for addressing any situation or concern, guiding us to always 'do the right thing.'

Our Core Values

This Code of Business Conduct (Code) sets forth the Core Values that govern how we conduct business and engage in our business relationships with customers and other stakeholders, including suppliers, fellow employees, lenders, investors, governmental agencies and the communities in which we do business. Maintaining and nurturing a culture that is consistent with our Core Values is key to our long-term success and sustainability as a company.

SAFETY & ENVIRONMENTAL STEWARDSHIP

We conduct our business in a manner that is safe for our employees, business partners, communities and the environment.

OWNERSHIP & ACCOUNTABILITY

We take ownership of our actions and are accountable to each other and our stakeholders, including the communities where we live and work.

RESPECT, FAIRNESS & INCLUSION

We treat each other with respect and fairness, and are committed to an inclusive workplace.

ETHICS & INTEGRITY

We do the right thing, obey the law, and act with the highest levels of honesty, ethics and integrity.

TEAMWORK

We foster a collaborative environment and work together to achieve our goals.

ENTREPRENEURSHIP & INNOVATION

We are a nimble team that develops and implements creative solutions that deliver value for our stakeholders and drive continuous improvement.

This Code and the Company's policies and procedures cannot cover every possible issue that may arise. Our Core Values, however, are the foundation of our culture and should serve as a compass for addressing any situation or concern, guiding us to always "do the right thing." When we conduct ourselves in accordance with our Code and these Core Values, we meet our commitment to conduct business the right way.

Our Code

What is the Code of Business Conduct?

Our Code sets forth the standards, principles and values that we are expected to honor when conducting business for Plains.[1] It also provides us with information regarding various resources that are available to all employees and directors who may need additional information or have a question or concern.

Who Has to Follow the Code and What is Expected?

If you are an employee or director[2] of Plains or any of its affiliates, you are obligated and expected to abide by and follow our Code (used throughout this Code, the term "employees" includes employees and officers). Your responsibilities include:

- educating yourself about the policies, procedures and laws that apply to your work;
- complying with our Code, our policies and procedures and any applicable laws and regulations;
- maintaining appropriate ethical behavior;
- asking questions if you are unsure about your responsibilities or need guidance or additional information;
- reporting any known or suspected violations by others of our Code, our policies, procedures or any applicable laws or regulations; and
- when requested, certifying your compliance with our Code.

We also have separate, specific policies and procedures to follow in particular circumstances and in specific areas of our business. If you believe this Code or such policies and procedures conflict with a law or legal obligation, you should contact the Plains legal department for guidance.

What Happens if I Don't Follow the Code?

Violations of the provisions of our Code or failure to report violations of the Code will result in disciplinary actions, up to and including termination.

Our Code reflects general principles to guide us in making ethical decisions. It cannot, and is not intended to, address every specific situation. As such, nothing in our Code prohibits or restricts the Company from taking any disciplinary action on any matters pertaining to an individual's conduct, whether or not they are expressly discussed in this document.

Questions About our Code and Reporting Violations

Our Code and our Core Values should help us work through most business issues and dilemmas. In some situations, however, the answers may not be obvious.

In such a situation, take time to think through these questions:

- What are the relevant facts?
- What feels right or wrong about the situation?
- Have you sought guidance from a supervisor or consulted other resources within the Company?
- Would you be comfortable if the conduct in question became a matter of public discussion?

Our Code reflects general principles to guide us in making ethical decisions.

1) We use "Plains," "Plains All American" or "Company" in this Code to refer to PAA GP Holdings LLC and Plains All American GP LLC. Unless the context indicates otherwise, it also includes Plains GP Holdings, L.P., Plains All American Pipeline, L.P. ("PAA" or the "Partnership") and its subsidiaries, including Plains Midstream Canada ULC.

2) Certain aspects of conduct by our directors are addressed by provisions in our Governance Guidelines (available on our website) and in the governing documents for the Company and the Partnership. Conduct by a director in accordance with such provisions is consistent with the requirements of this Code.

We must all work to ensure that violations of the Code are handled promptly and consistently.

All employees and directors should speak openly and ask questions about the Code, or any other subject without fear of retaliation.

Contact our confidential third-party toll free hotline service by phone or online (Clearview Connects @ 1-855-894-2561 or www.clearviewconnects.com). Available 24 hours a day, seven days a week.

In most cases, if you have a question or concern about the Code, you should discuss it with your supervisor. If for any reason you are uncomfortable discussing the matter with your supervisor, or you are dissatisfied with the answer, you may bring the matter to the attention of any of the following:

- The human resources department
- The legal department
- The Vice President of internal audit.

A list of contacts for questions regarding the Code is available on MyPlains – Our Documents. If for any reason you are uncomfortable with any of the above choices, you may report anonymously by phone or online to our confi dential third-party hotline service (Clearview Connects @ 1-855-894-2561 or www.clearviewconnects.com). This service is available 24 hours a day, 7 days a week. The hotline service may also be used to report (anonymously if desired) concerns regarding asset maintenance or integrity.

We must all work to ensure that violations of the Code are handled promptly and consistently. If you observe illegal or unethical behavior, or behavior that violates our Code or any of the policies of the Company, or if you have genuine reason to believe that such behavior has happened or is going to happen, you have the duty under our Code to promptly bring it to the attention of your supervisor (provided your supervisor is not involved in the violation) or other appropriate personnel, or contact the hotline. Looking the other way (or failing to report) constitutes a violation of our Code.

For more information regarding the reporting of workplace complaints or problems, please refer to our complaints and problem resolution policy (available on MyPlains – Our Documentation). For more information about the reporting of concerns or complaints regarding accounting or auditing matters or internal accounting controls, please refer to our policy and procedures regarding that topic (available on MyPlains – Our Documentation).

Investigation of Potential Code Violations

Reports of misconduct will be treated confidentially to the extent practical and legally permissible. The Company will take appropriate action with respect to reports of misconduct it receives, which may include an investigation of the reported matter. You may be requested to participate in an investigation of misconduct, and anyone receiving such a request is expected to comply with the request. Individuals who conduct any investigation will be acting on behalf of the Company and not acting as your personal representative or lawyer.

Non-Retaliation Policy

All employees and directors should speak openly and ask questions about the Code, or any other subject, without fear of retaliation. Plains strictly forbids retaliation for raising concerns under our Code, our standards or applicable law. Employees and directors are prohibited from retaliating or taking any hostile action against anyone who raises an issue of concern in good faith or who assists in the investigation of any reported misconduct. Such retaliation would itself constitute a violation of our Code. However, anyone who intentionally reports false information is also in violation of our Code and will be subject to disciplinary action.

Protecting Employees, Community Members and the Environment

We believe our business of transporting energy provides a strong and positive benefit to the quality of life of individuals and communities around the world. We are committed to protecting our employees, the communities in which we operate and the environment. Our people are our most valuable asset; accordingly, making sure that each of us returns home safely at the end of the workday to our families and loved ones is our highest priority. We are also committed to minimizing our environmental footprint.

Accomplishing these fundamental objectives starts with our mandate that unsafe practices and risky behavior that endanger employees, the communities in which we operate or the environment will not be tolerated. We will not take shortcuts with respect to safety and all employees and contractors have the responsibility and authority to stop work that they believe is unsafe. We follow our Life Rules to guide the way we work, and strive for zero injuries and environmental releases.

We support our commitment to safe, reliable and environmentally responsible operations through extensive and ongoing education and training, as well as investment in necessary equipment, systems, processes or other resources. Our commitment also includes compliance with applicable environmental, health and safety rules, laws and regulations. For additional information regarding our environmental, health and safety policies and procedures, please refer to our safety and operating policies and manuals (available on MyPlains – Our Documentation).

Substance Abuse

Plains is committed to maintaining a work environment free from drug and alcohol misuse, to promote both the quality of its services and the safety of its employees, its customers and the public. Employees may not work under the influence of alcohol, drugs, narcotics, intoxicants, prescription drugs or over-the-counter medication that might cause an inability to work safely. Employees are prohibited from soliciting, distributing or selling illegal drugs or bringing illegal drugs or drug-related paraphernalia into the work environment. For additional information, please refer to the Company's drug and alcohol policies (available on MyPlains – Our Documentation).

Right

- **Alerting your supervisor immediately and stopping the job if conditions are unsafe**
- **Consulting your supervisor if you have any doubts concerning safety or environmental requirements**

Wrong

- **Performing a task that you are not trained or equipped to do**
- **Not using personal protective equipment required for the job**
- **Remaining silent and continuing to work on a job you believe is unsafe or involves an unacceptable level of risk**

Our ethical standards rest on doing the right thing and obeying the law.

Violence

Plains is committed to providing a safe and secure work environment. Acts or threats of violence interfere with our commitment to health and safety and will not be tolerated. Any threatening behavior, even if made in a seemingly joking manner, must be reported immediately.

If you or someone you know is in immediate danger, use your judgement when reacting and, if appropriate, call local law enforcement authorities before reporting the incident through the normal channels.

Obeying the Law

Our ethical standards rest on doing the right thing and obeying the law. We are expected to respect and obey the laws of the cities, states, provinces and countries in which we operate. Although not all individuals are expected to know the details of these laws, it is important to be familiar with the laws that apply to your area of responsibility, and to know enough to determine when to seek advice and counsel from supervisors, managers, the legal department or other appropriate personnel. If you are unsure about your responsibilities under the law, please contact a member of the legal department.[3]

Avoiding Improper Business Conduct

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to inappropriately influence or be influenced by customers. No gift or entertainment should ever be offered, given, provided or accepted by any Company employee or family member of an employee if it (1) is a gift of cash (including gift cards) or securities, (2) is or could be construed as a bribe or payoff, or (3) violates any laws or regulations. We should always exercise caution and use good judgment when offering or accepting business courtesies (gifts of nominal value from or to someone doing business with Plains or soliciting business from Plains) to ensure that giving or receiving such gifts does not create an appearance of any impropriety. Please consult your supervisor or a member of senior management if you are uncertain whether any gift or proposed gift is appropriate. Plains prohibits bribes, kickbacks or other illegal efforts to obtain an improper business advantage. Never directly or indirectly promise, offer, deliver or authorize the giving of money or other things of value to or for the benefit of any governmental official or governmental employee, to inappropriately influence, or obtain or retain business with, a governmental entity.

Proper Use of Company Assets

Our employees are entrusted with access to, and management of, Plains assets. We should endeavor to protect and ensure the efficient use of the Company's assets. Theft, carelessness and waste have a direct impact on the Company's profitability. Company property, information and position should be used to advance the legitimate business interests of the Company and not for personal gain. Except as specifically authorized by the Company, Plains property and equipment may only be used for Company business. Any suspected incident of fraud or theft should be reported immediately. If you believe Plains resources are being wasted or used inappropriately, you should bring your concern to the attention of your supervisor (provided your supervisor is not involved in the activity), other appropriate personnel or contact the hotline.

3) Legal department contact information is available on MyPlains under Workplace Resources – Our Departments.

Social Media and Public Comments

We recognize that numerous opportunities exist to participate in interactive discussions and share information on particular topics, including through industry groups, at seminars or on the internet via social media. Plains uses social media to provide our stakeholders with updated information about the Company, our community activities and our accomplishments. Only an authorized individual can post communications or answer questions on behalf of Plains on the Company's social media channels. Only an authorized individual can speak about Plains to the media, the investment community, elected officials, and in other public forums, including public seminars, social media and networks, wikis and blogs.

We respect the right of employees to use the internet as a medium of self-expression and encourage them to do so in a tactful and professional manner that is consistent with our Core Values. However, we must exercise caution when making public presentations or utilizing social media and/or networking platforms, as it is our responsibility to ensure that we do not discuss company business or disclose confidential or proprietary information regarding the Company. When speaking or posting on public sites, we should make clear that we are expressing our own individual views and not those of the Company. It is also inappropriate to use any public platform, including social media, to make false or misleading statements about the Company or any of its employees or directors. It is always advisable to consult with the legal department or the communications department before making any public presentation or internet posting that could be mistaken as a statement on behalf of the Company.

Political Activity

Our industry is regulated by federal, state, provincial and local entities and matters that may affect our business or stakeholders frequently arise in the political and policymaking process at all levels of government. Plains engages in these processes to support our business interests in a manner that is ethical, transparent and compliant with relevant federal, state, provincial and local lobbying requirements, including making the required filings or disclosures of registered lobbyists, lobbying activities, lobbying costs and political activity.

Plains encourages employees to engage in their community and remain informed on current events. Plains supports the interest of employees to participate in the political process, including by voting, volunteering personal time to support political campaigns, or running for or holding elected office. To ensure compliance with all rules and ethics requirements and to avoid any potential conflicts of interest, employees are required to notify the government relations team prior to running for public office or holding a governmental position. Only an authorized individual can engage with any elected officials, their staff or political appointees on business-related issues.

Conflicts of Interest

We must protect the Company's reputation for integrity against any situation that could create a conflict of interest. A "conflict of interest" exists when a person's personal interests interfere, or may be perceived to interfere, with the interests of the Company.[4] Our dealings with business partners, customers, suppliers, contractors, competitors, or anyone doing or seeking

4) The Partnership's Agreement of a Limited Partnership and the Company's Governance Guidelines specify a process for resolution of a conflict of interest between the Company on the one hand and the Partnership and its limited partners on the other. Proper resolution of conflicts of interest or potential conflicts of interest (including any derivative conflict created by an executive officer's ownership of interests in the Company) in accordance with the process described in the Partnership Agreement and the Governance Guidelines is consistent with the requirements of this Code.

Conflicts of interest are not always clear-cut or obvious, so if you have any questions, please consult your supervisor, a member of senior management, the internal audit department or the legal department.

Right

- **Disclosing to your supervisor any relationship where your interests may conflict with the interests of Plains**
- **Excusing yourself from decisions where there is a conflict of interest, or the appearance of one**
- **Carefully scrutinizing business courtesies offered or received to ensure they are consistent with the principles contained in the Code**

Wrong

- **Failing to disclose a personal or family business or financial relationship or close personal relationship with a client or supplier of Plains**
- **Giving gifts to, or accepting gifts from, any governmental or quasi-governmental employee or representative**
- **Otherwise giving or accepting gifts or other personal benefits that are not normal business courtesies, and that are given or accepted in exchange for past or future business with the Company**

to do business with the Company must be in the best interests of the Company. We must be careful to avoid any situation that may involve a conflict between our personal interests and the interests of the Company. It is also important to avoid even the appearance of a conflict of interest or any situation where a reasonable observer might assume that we are not acting objectively on behalf of Plains.

A conflict of interest can arise when a person takes actions or has interests or relationships that may make it difficult to perform their Company work objectively and effectively. Conflicts of interest may also arise when an employee or director, or a member of their family or inner circle (i.e. close friends or colleagues), receives improper personal benefits as a result of their position with the Company.

Certain situations increase the likelihood of a conflict of interest, including, but not limited to:

- serving (or having a family member or close personal friend who serves) as an employee, director or partner of a business enterprise that does or is seeking to do business with the Company (such as a supplier, customer, contractor or business partner) or that competes with the Company;
- having a personal or family business, financial or other interest in any enterprise that does or is seeking to do business with the Company or that competes with the Company (other than investments in publicly traded entities);
- acquiring or holding any interest in any entity, property or other asset in which the Company has an interest or potential interest; and
- the Company making loans to, or guaranteeing obligations of, employees, directors or their family members.

Actual or potential conflicts of interest must be disclosed in writing for review by your supervisor and a member of senior management by submitting a conflict of interest disclosure form (available on MyPlains – Our Documentation). In most (although not all) instances, we will work to find a way to resolve conflicts of interest; in some cases, resolution may involve a reassignment of duties or forfeiture of the activity or interest that creates the conflict. In some instances a formal waiver of the conflict of interest may be required. Conflicts of interest are not always clear-cut or obvious, so if you have any questions, please consult your supervisor, a member of senior management, the internal audit department or the legal department.

Having a potential conflict of interest is not necessarily a violation of the Code, but failing to disclose it is. Any employee who becomes aware of a conflict or potential conflict should immediately bring it to the attention of his or her supervisor, manager, member of senior management, internal audit department or other appropriate personnel by submitting a Conflict of Interest Disclosure Form or reporting the concern through the reporting mechanisms set out in this Code. The Conflict of Interest Disclosure Form is available on MyPlains under Workplace Resources – Our Documentation.

Corporate Opportunities

Any business opportunity that is discovered through or arises from the use of Company property, information or position belongs to the Company. Any employee or director who becomes aware

of such an opportunity must bring it to the attention of their supervisor or an officer of the Company. No employee or director may take personal advantage of such an opportunity, or directly or indirectly compete with the Company for such opportunity, without first obtaining a specific, written waiver. The process for obtaining a waiver is set out below. In the absence of such a waiver, you must abandon or forfeit such opportunity.

Waivers of the Code of Business Conduct

Waivers of this Code must be obtained in writing from the Vice President, Senior Vice President or Executive Vice President of your business unit or corporate function. In addition, all waiver or approval requests determined to be material by the applicable Vice President, Senior Vice President or Executive Vice President (after consultation with the legal department, HR, or a higher-level officer) must also be approved by the Chief Executive Officer and any one of the following officers: President, Chief Operating Officer, Chief Commercial Officer, Chief Financial Officer or the General Counsel. Whether a formal waiver is, or is not, required with respect to a conflict of interest shall be determined in connection with the resolution of such conflict following its disclosure as provided above (see Conflict of Interest Disclosure form on MyPlains - Our Documentation).

The Chief Executive Officer may veto any waiver. However, only the Board or a Board committee may authorize a waiver of our Code for executive officers (an officer subject to the reporting requirements of Section 16(a) of the Securities Exchange Act of 1934, as amended) and directors, and any such waiver will be promptly disclosed to the extent required by law or stock exchange regulation.

Honest Recordkeeping and Reporting

The Company requires honest and accurate recording and reporting of information to make responsible business decisions. For example, only the true and actual number of hours worked should be reported.

Many employees regularly use business expense accounts, which must be documented and recorded accurately. If you are not sure whether a certain expense is legitimate, consult the business travel and entertainment expense reimbursement policy (available on MyPlains – Our Documentation) or ask your supervisor.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, and must conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" funds or assets are not permitted.

Business records and communications often become public, so we should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that could be misunderstood. This applies to internal memos, formal reports, telephone calls, emails, texts, chats and other forms of electronic communication. No records or documents should be altered or destroyed if the subject matter relates to a private dispute or governmental investigation or proceeding. In the event of anticipated, threatened or actual litigation or governmental investigation, do not alter or destroy any records or documents and consult the legal department.

Your obligation to protect the Company's assets includes maintaining and protecting the confidentiality of information entrusted to you by the Company or by third parties except where disclosure is authorized or legally required.

Accurate Public Disclosure

Plains is committed to the full, fair, accurate, timely and clear disclosure in documents filed with the Securities and Exchange Commission ("SEC") and in other public communications. Every employee and director involved in the preparation or review of such filings or communications must demonstrate that commitment.

This often means going beyond mere compliance with accounting procedures or SEC rules. To the extent you are involved in the process of auditing and reviewing our financial statements, you must endeavor to cooperate with our external auditors. We must never take any action to coerce, manipulate, mislead or fraudulently influence such auditors during the process. Any contact with investors, securities analysts or the news media regarding Company business is limited to a specified group of authorized individuals. For more information, please refer to the Company's media policy and policy for informal disclosure (available on MyPlains – Our Documentation).

Our Chief Executive Officer, Chief Financial Officer and Chief Accounting Officer are subject to this Code along with every other employee. These officers are also subject to a separate Code of Ethics for Senior Financial Officers (available in the Investor Relations portion of our website at www.plains.com).

Protecting Confidential Information

Through your work at Plains, you may come across non-public or proprietary information about our Company or others. Your obligation to protect the Company's assets includes maintaining and protecting the confidentiality of information entrusted to you by the Company or by third parties except where disclosure is authorized or legally required.

Confidential information includes all non-public information that might be of use to competitors, or harmful to Plains or its customers, if disclosed. It also includes intellectual property such as trade secrets, as well as business, marketing and operational plans, customer information, databases, records, salary information and any financial data and reports that have not been publicly disclosed by Plains.

Unauthorized use, disclosure or distribution of this information would violate our Code, and it is also illegal to remove trade secrets from a company or to possess stolen trade secrets. The obligation to preserve confidential information applies both at work and away from the office and continues even after employment ends. For more information, please refer to our policy on insider trading and policy for informal disclosure (available on MyPlains – Our Documentation).

Insider Trading

Employees and directors at Plains may have access to confidential information about the Company, suppliers, customers or other business partners. Because the securities of PAA and PAGP are publicly traded, you should be aware of the strict laws prohibiting trading in securities while in possession of any material, non-public information. In this context, information is "material" if there is a substantial likelihood that an investor would reasonably consider it important in arriving at a decision to buy, sell or hold

securities. Information is considered to be "non-public" until it has been widely disseminated to the public (through a news release or other form of public disclosure by the Company).

Examples of potentially material information include:

- information about earnings or losses, business forecasts, distributions or ratings of debt securities;
- a pending or proposed significant acquisition, disposition, merger or tender offer;
- a pending or proposed significant joint venture;
- a Company restructuring;
- regulatory developments that could significantly impact the Company;
- a significant disruption in the Company's operations, or a material adverse event, loss, potential loss, breach or unauthorized access affecting the property, systems or assets of the Company;
- a change in executive management;
- pending or threatened significant litigation or governmental investigation, or the resolution of such litigation or conclusion of such investigation; and
- gain or loss of a major customer or material contract.

If in the course of your work you have access to material, non-public information about any company, you must not share that information with others, and you must not buy or sell any of that company's securities or options. You should also be careful to avoid creating even the appearance of improperly using or acting on inside information. Please refer to our policy on insider trading for more detailed information (available on MyPlains – Our Documentation).

Protecting Employee Personal Information

We each provide personal information to the Company with the expectation that it will be properly secured and used only for appropriate business purposes. Plains is committed to respecting the privacy of all personal information that it possesses, including social security numbers, dates of birth and home addresses among other things. Specific internal rules guide our conduct in the collection, use, release, disclosure and security of such data and describe our expectations of third parties who handle such data on our behalf. If your work at Plains includes handling such personal information, you have an obligation to protect such information and use it only for the purposes described.

Focus on Our Colleagues, Customers, Suppliers and Other Stakeholders

Our reputation is in large measure defined by how we treat each other, our customers, suppliers and other stakeholders. Our business goal is to consistently generate superior results, fairly and honestly, and never through unethical or illegal business practices. No employee or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged or proprietary information, misrepresentation of material facts, or any other intentionally unfair practice.

Our business goal is to consistently generate superior results, fairly and honestly, and never through unethical or illegal business practices.

Our Code is not intended to create any express or implied contract with any employee or third party. This document is not an employment contract between the Company and any of its employees.

Right

- **Ensuring interactions with other Plains employees and outside parties are consistent with Company values**
- **Making hiring and other employment decisions based only on merit and business considerations, without discrimination**

Wrong

- **Failing to internally report discrimination or other misconduct**
- **Treating employees or third parties disrespectfully**
- **Behaving in an intimidating or hostile manner**
- **Displaying offensive material at work**

Discrimination and Harassment

We are committed to providing a professional and inclusive work environment in which all individuals are treated with respect and dignity, free from any type of discrimination or harassment based on race, color, religion, gender, sexual orientation, national origin, age, disability, genetic information, marital status, status as a covered veteran or other legally protected category. This commitment extends to providing equal opportunities in all aspects of employment as required by all applicable laws.

We will not tolerate any unlawful discrimination or harassment of any kind, including, but not limited to, sexual harassment or any behavior that creates an intimidating, hostile or offensive work environment. Examples include derogatory comments based on racial or ethnic characteristics, unwelcome sexual advances or requests, or engaging in inappropriate coercive behavior. Any employee (whether an individual contributor, supervisor, manager, or senior executive) who fails to abide by our policies and/or laws prohibiting discrimination and retaliation may be subject to discipline, up to and including termination. Please refer to our equal employment opportunity and anti-harassment policies for U.S. employees and respectful workplace policy for Canadian employees (available on MyPlains – Our Documentation) for more information.

No Implied Contract

Our Code is not intended to create any express or implied contract with any employee or third party. This document is not an employment contract between the Company and any of its employees. Moreover, there are no third-party beneficiaries of our Code. The Code is not intended to affect any of the rights and powers under the Partnership Agreement of Plains All American Pipeline, L.P. or Plains GP Holdings, L.P. or the Limited Liability Company Agreement of Plains All American GP LLC or PAA GP Holdings LLC, as the same may be amended or restated from time to time, including without limitation the indemnities and related provisions contained therein. The Company may amend the Code at any time and without prior notice.

Additional Resources

Copies of our Code as well as our Governance Guidelines and Code of Ethics for Senior Financial Officers are available on our website (www.plains.com) under "Investor Relations – PAA – Structure and Governance." A list of contacts for questions regarding the code is available on MyPlains – Our Documents.

Company policies (including safety and operating policies and drug and alcohol policies) may be accessed by employees via MyPlains or by contacting the human resources department.

Plains is a North American Company with employees in Canada and the U.S. There are differences between U.S. and Canadian laws and employees must follow the Company policies and laws applicable to the country where they work.

Our reputation is in large measure defined by how we treat each other, our customers, suppliers and other stakeholders.

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PLAINS