



POLICY STATEMENT

Affirmative Action

Statement of Purpose/Philosophy

Boardwalk Pipelines, and its subsidiaries, hereinafter referred to as the "Company", shall take affirmative action, positive and extraordinary, to overcome the discrimination effects of traditional policies and procedures with regards to the disabled, minorities, women, and military veterans.

Policy Requirements

The Company recognizes that the barriers of race, color, religion, sex, national origin, age, disability, or veteran's status of some individuals have resulted in their denial of full participation in all societal functions and is, therefore, committed to taking affirmative steps aimed at overcoming such historical patterns of discrimination in our society.

It is the practice of this Company to further its goal of equal employment for all employees and prospective employees by complying with all lawful provisions of Executive Order 11246, as amended, and other applicable government regulations, including establishing and maintaining a written Affirmative Action Plan.

The Company's affirmative action program identifies special actions intended to bring such groups into full participation in all aspects of the business. Through its affirmative action program, the Company is committed to:

- Increasing the numbers of minorities, females, disabled and military veterans in all aspects of employment with special procedures applicable to those positions determined to be underutilized for minorities, females, disabled and military veterans
- Cultural diversity in the business environment
- The removal of barriers to the disabled through compliance with the provisions of the Americans with Disabilities Act ("ADA") and Rehabilitation Act.

Reasonable Accommodation:

The Company will make a reasonable accommodation to the known physical or mental limitations of a qualified applicant or employee with a disability in order to enable them to perform essential job duties, unless such accommodation would impose an undue hardship on the business.

This policy complies with all new and existing federal and state affirmative action/equal employment opportunity guidelines and regulations, as well as the ADA and Rehabilitation Act, and relates to protecting qualified applicants and employees with disabilities in all phases of employment, including, but not limited to recruitment, hiring, transfer, promotion, compensation, training, benefits, and termination. Discrimination and harassment are prohibited by law and will not be tolerated.



Accountability: Roles & Responsibilities

Affirmative Action Policy (cont'd.)

The Company is committed to taking affirmative action in increasing opportunities at all levels of employment and targeting resources at combating disadvantage, as well as encouraging voluntary/community action and promoting social inclusion.

Employees in need of reasonable accommodation should make such needs known to their supervisor or the Human Resources Department. The Company will treat employee accommodation requests and related information as confidential to the maximum extent possible.

Company employees will take an active part to ensure that all employees and prospective employees are treated in a nondiscriminatory manner by establishing compliance with the policy as a performance standard. Every employee is responsible for the effective implementation and support of this policy; therefore, any employee who feels that: a) they have not been treated in accordance with this policy; b) witness unlawful discrimination; or c) has another employee confide that they have not been treated in accordance with this policy must immediately contact either their supervisor, a member of the Company's management team, the Human Resources Department, or contact the Ethics Line at (866) 552-3557. Complaints will be held in confidence to the extent possible, and all investigations will occur within a reasonable timeframe with the spirit and intent being a timely resolution.

Related References

);i- Affirmative Action Plan
Code of Business Conduct and Ethics
Ethics Line - (866) 552-3557

Owner: VP, Human Resources

Reviewed by: CEO
VP, Compliance
General Counsel

Initials
SGH
RPY
WJL

Approver and Date:

Steve Burri
VP, Human Resources

Effective Date:

7/1/15

Revision Date(s):

7/1/15