



ENABLE MIDSTREAM PARTNERS, LP

CODE OF BUSINESS CONDUCT AND ETHICS

OUR VALUES IN ACTION



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A Message from our CEO



Enable Midstream Employees,

Every day the men and women of Enable gather, process, transport and store the raw energy that keeps America moving. We strive to be the preferred midstream company in each of our operating areas across dozens of worksites in 11 states. Yet everywhere we do business – whether in the field, in one of our facilities or in an office – we take the same approach. We operate honestly, fairly and ethically. Simply stated, we do what's right, driven by our core values. We call it One Enable Way.

One important part of our culture is our Code of Business Conduct and Ethics. Because we know that compliance with the law is simply the baseline, we go further, striving to ensure that every action we take is beyond reproach. That's what putting our values in action is all about – embodying One Enable Way in every decision we make. In fact, ethics are so important to Enable, that our Board of Directors has officially adopted this code and expects each of us to understand it and take its messages to heart.

Above all, we ask that you strive to become a living model of integrity at Enable. When you practice our ethical principles in your day-to-day activities, you'll help influence others to do the same. A critical part of demonstrating integrity is speaking up when something is wrong. Letting us know about misconduct is just as important as doing the right thing, which is why we have multiple ways to report concerns and ask ethical questions, including an independent Enable Helpline you can call around the clock.

I hope you'll use all the resources at your disposal to learn more about ethics at Enable. Reading this code is your first step toward putting our values into action. While it won't address every ethical situation, it will lay out the guiding principles you can apply. It will give you examples and answer the most frequently asked ethical questions. Thank you for your dedication to Enable and your ongoing commitment to ethics and integrity.

Sincerely,

ROD SAILOR | President and Chief Executive Officer



We Live By Our Values



SAFETY

We place the well-being of each employee and the public above everything else.



INTEGRITY

We conduct ourselves and our business in an honest and ethical manner.



CUSTOMER SERVICE

We focus on the needs and expectations of the customer, and we partner with them to provide innovative and creative solutions.



TEAMWORK

We will succeed through collaboration with a sense of urgency in an environment of trust, respect and inclusion.



ACCOUNTABILITY

We hold ourselves accountable as stewards for our investors, our customers, our community and our environment.

Powered By Principles

Our ethical principles give us the power to prosper. When you act ethically and responsibly, you add to our momentum and enable our success.

1.1 PUTTING OUR VALUES INTO ACTION

Having a Code of Business Conduct and Ethics is important for several reasons. It puts our values into action. It keeps us committed to honesty, integrity and fairness in all our business dealings. It strengthens our reputation as a preferred midstream services provider and assures our customers and communities that we are worthy of their trust.

Although this Code outlines the most common ethical risks and includes many examples, it cannot answer every ethical question you might face. Instead, think of this document as a framework for ethical decision-making complete with tools you can use to clarify most situations. If you ever have questions or need additional guidance, talk with your supervisor.

Our Code Applies to Everyone

Our Code Is:

- A statement of our principles.
- A guide to the way we conduct business.
- A commitment we make to our customers, communities, the Company and each other.
- A responsibility we share.
- Part of everyone's job.

Our Code Is Not:

- A comprehensive rulebook.
- A legal document.
- A binding employment contract.
- A substitute for training.

Our Code applies equally to every employee, officer and director of Enable Midstream Partners, LP, including our general partner Enable GP, LLC and all of our subsidiaries (collectively, "Enable Midstream" or "the Company"). In addition, we expect all of our contractors and suppliers, and anyone who performs work on our behalf, to share our commitment to ethics and follow our Code.

Use Your Power

For our Company to perform ethically, each of us must be committed to our Code. You have the power to protect Enable Midstream's reputation as well as your own.

- Comply with all laws and Company policies, procedures, standards and processes. Our policies, procedures, standards and processes are generally referred to in this Code as our policies.

Q&A

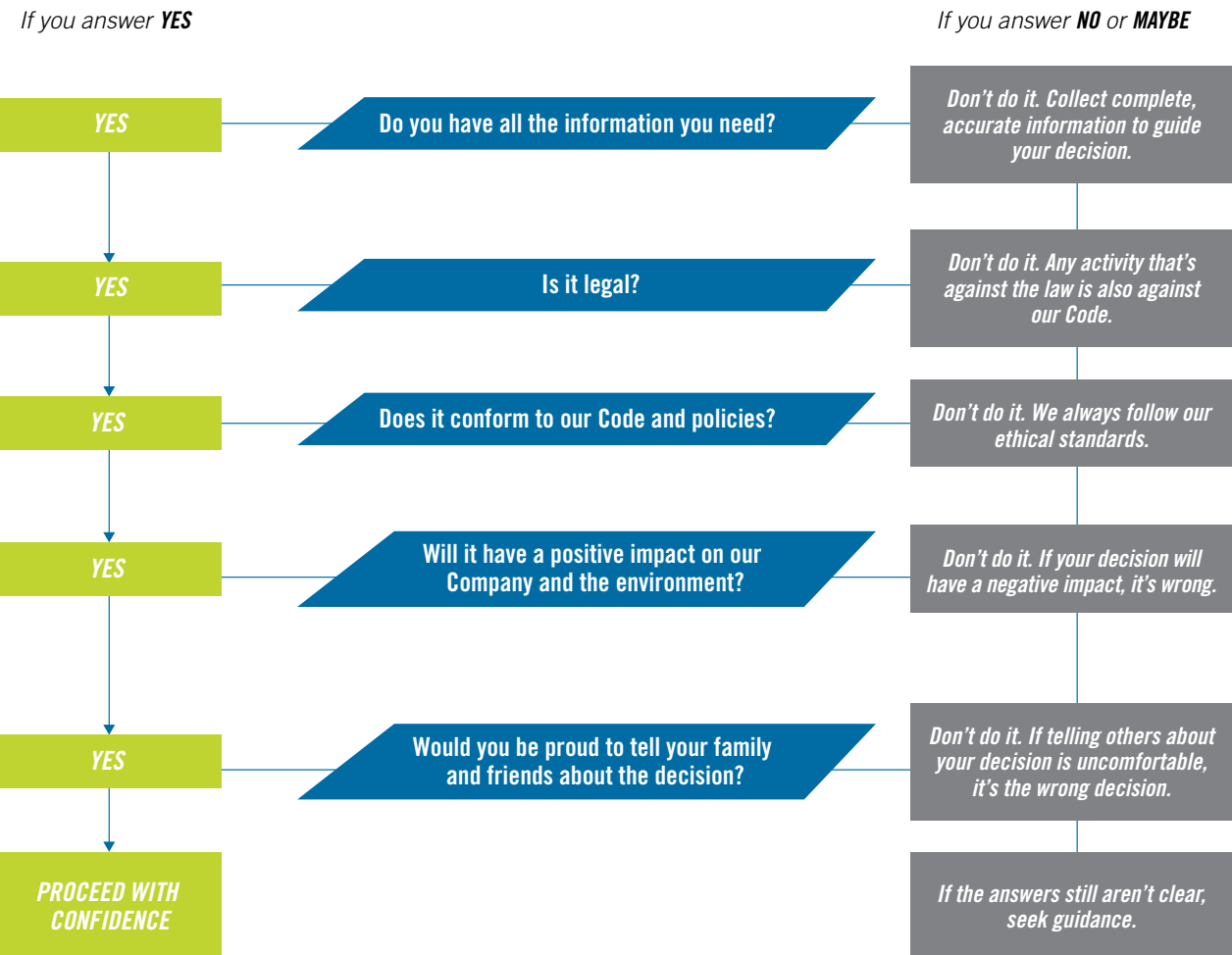
Q: When it comes to decision-making, I trust my instincts. Isn't that enough?

A: No. Instincts can help guide you, but you need facts to make ethical decisions. Learn to ask the right questions to ensure the integrity of your choices.

- Familiarize yourself with the ethical issues that could affect your job.
- Conduct yourself with integrity and practice ethical decision-making.
- Take responsibility for your actions.
- Participate in ethics training.
- When in doubt, refer to the Code or seek guidance from your supervisor.
- Report any violations you witness or suspect.

1.2 HOW TO MAKE ETHICAL DECISIONS

Sometimes you know instinctively whether a decision is right or wrong. But not all ethical decisions are clear-cut. The best way to make integrity a habit is to ask yourself a series of questions every time you face a decision with potential ethical implications.



1.3 REPORTING ETHICS AND COMPLIANCE ISSUES

To keep our reputation intact and our Company strong, we all have an obligation to live up to our values, hold each other accountable and report concerns of misconduct or any violation of our Code or the law. These actions protect our Company, partners, customers and careers.

What Issues Should Be Reported?

Report any concern you might have. You do not need proof that a violation has occurred – that will be determined through an investigation conducted by the Company. Our only requirement is that you report in good faith, meaning you have a genuine concern and are not presenting false information or acting out of revenge or malice. The following are just a few examples of concerns you would definitely want to bring to our Company's attention:

- Possible criminal conduct
- Environmental concerns
- Potential violations of our Code or other policies
- Health and safety issues
- Accounting or auditing matters
- Any request to violate our Code or our other policies

How to Report a Concern

When you have questions, concerns or suspicions about ethical issues, there are several places you can turn for help:

- **Your Supervisor** – If you feel comfortable talking about the issue with your supervisor, he or she is usually the best source of information, advice and problem-solving assistance.
- **Other Enable Midstream Leaders** – If you're uncomfortable speaking with your supervisor for any reason, you have the option of discussing the issue with a more senior leader in your department or with Human Resources.
- **Chief Ethics And Compliance Officer** – If you do not believe your concerns were addressed properly, please contact the Ethics and Compliance Office.
- **The Enable Helpline** – If you prefer to remain anonymous, this reporting system is available by phone, text and online. It lets you:
 - Call toll free from any location – 800-461-9330
 - Submit a report online by visiting helpline.enablemidstream.com
 - Text ENABLE to 405-839-7612
 - Ask a question or report a concern anytime of the day or night
 - Remain anonymous and discuss your concerns without giving your name
 - Protect your privacy even if you choose to give your name
 - Follow up on the status of the investigation using the PIN number you are given when you report

Q&A

Q: Someone in my department routinely violates Company policy, and everyone knows it – even the supervisor. If nobody else is reporting it, then I shouldn't either, right?

A: Wrong. You have a responsibility to speak up, even if time has passed and no one else has said anything. Your actions could help us identify a harmful act and take appropriate action.

Q&A

Q: As a supervisor, if one of my employees reports a concern, should I handle it on my own?

A: You don't need to handle concerns alone. If you're comfortable talking about the issue with your leader, you should seek guidance from them. And you or your leader should consult with the appropriate resource about the concern.

Protection from Retaliation

When you identify a concern in good faith, even if it proves to be unfounded, you are protected:

- **We have zero tolerance for retaliation** – At Enable Midstream, we have a strict anti-retaliation policy that prohibits any kind of retribution for making a good-faith report. If you believe you are being subjected to retaliation because you reported a concern, contact Human Resources, the Chief Ethics and Compliance Officer or the Enable Helpline.
- **Your report is kept confidential to the fullest extent possible** – If you choose to identify yourself when you file a report, we will protect your confidentiality to the fullest extent possible.

The Investigative Process

Regardless of how a report is received, every report is referred to Enable Midstream's Ethics and Compliance Office, which investigates the possibility of misconduct. All investigations are handled with discretion, protecting the confidentiality of anyone who makes a report as well as anyone under investigation except as necessary to conduct an investigation or required by law.

To ensure fairness, we ask many questions throughout the fact-gathering process. We may also enlist the assistance of other departments, such as Human Resources and Internal Audit.

Reports are reviewed with the Chief Executive Officer and other members of the senior leadership team as well as the Audit Committee of the Board of Directors. However, the names of the individuals who filed reports are not shared in these reviews unless it's necessary or required by law.

If a representative of our Company, a third party operating on our behalf or any government agency asks you to participate in an investigation, you have a duty to:

- **Cooperate fully** – Do not try to protect others or make judgments on your own.
- **Be honest** – Tell the truth and never mislead investigators or misrepresent facts.
- **Be complete** – Disclose everything and never keep any pertinent information to yourself.
- **Respond in a timely manner** – Never delay or obstruct an investigation.

If any law enforcement officer or government employee approaches you with a request for Company information or access to our premises, contact the Law Department immediately. This department will assist with any documents, information or testimony we might be asked to provide.

Q&A

Q: I have a suspicion about an unethical activity but I can't prove it. Should I try to gather more evidence before I report?

A: No. Your only responsibility is to report what you see or suspect. The Ethics and Compliance Office will obtain any necessary documents and testimony during the course of its investigation.

Q: If I make a report through the Helpline, who will see it?

A: The Enable Helpline forwards all reports to the Chief Ethics and Compliance Officer although you can report through this service without giving your name. Both the Helpline and our Company protect your identity as much as possible.



Q&A

Q: I think my supervisor may be violating our Code – if I complain, couldn't I lose my job?

A: No. Our Company prohibits retaliation against anyone for coming forward in good faith to share a concern.

When Disciplinary Action Is Required

Once an investigation is concluded, there could be a number of different outcomes:

- If no violation is identified, there will be no consequences for the person who was investigated.
- If a violation did occur, appropriate disciplinary action will be taken. That could vary from a warning to termination of employment, depending on the severity of the violation.
- If the breach of our Code was illegal as well as unethical, or if the action caused harm, any individual involved could also be subject to criminal or civil charges.
- Anyone who knows about a violation and doesn't report it or condones the misconduct in any way has also violated our Code and can be subject to discipline.
- Anyone who retaliates against someone who makes a good faith report may also face discipline.

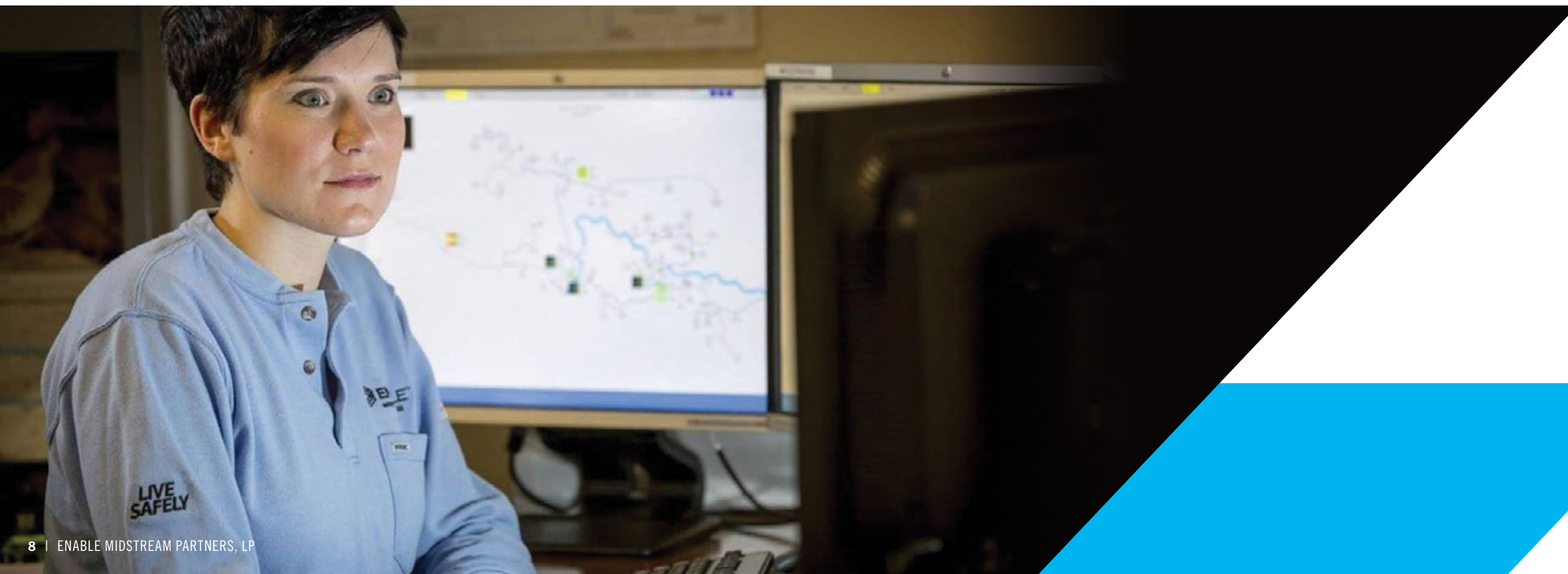
At Enable Midstream, we strive to protect everyone in the investigative process, along with our Company's reputation. By being fair and factual, we create a corporate culture that honors integrity and upholds high standards.

1.4 LEAD WITH INTEGRITY

We believe that leadership carries great responsibility. If you are a supervisor, you set the tone for how business is done at Enable Midstream. Always be aware of your own actions and how they might influence employees.

We depend on you to:

- Be an example of strong ethical behavior. Make integrity a priority for your team.
- Encourage open communications. Your employees should always feel comfortable coming to you with questions.
- Utilize our ethics training resources often.
- Take every report seriously.
- Respond promptly. Never assume a problem will resolve itself. Report every incident that's reported to you in a timely manner to the appropriate resource.



Powered by Safety

We put safety first in our list of values for a good reason: it’s our top priority. In your every action, safeguard yourself, your co-workers, our Company and the environments in which we work.

2.1 ENSURING EVERYONE’S HEALTH AND SAFETY

We make every effort to protect your health and safety, along with the well-being of every other Enable Midstream employee and the public. But you are as responsible for safety as our Company is.

You have a responsibility to follow our safety policies, procedures, standards and processes, protect yourself and hold everyone you work with to the same high standards. We expect you to immediately report:

- Any situation that you believe to be an environmental, health, or safety hazard.
- Environmental, health or safety policies that are being ignored.
- A request to compromise safety, health or the environment in favor of production.
- Any hazardous substance that has been released into the environment.
- Any work-related accident or injury that occurs, no matter how minor.

As with all reports, you can speak with your supervisor or a more senior manager. Since it’s a safety issue, you can also contact the Environmental, Health and Safety Department with any concerns.

2.2 REPORTING ENVIRONMENTAL, HEALTH AND SAFETY INCIDENTS

Any and all workplace incidents must be recorded immediately in accordance with our Incident Classification (Effective December 1) and Notification Procedure. This procedure protects us all by gathering information to identify and mitigate hazards and potential risks. It also allows us to continually improve our safety report and modify our policies, procedures, standards and processes as needed.

Q&A

Q: My boss asked me to take a shortcut to make up time and hit our deadline. But I don’t think his request is safe. What should I do?

A: You should speak up. If your supervisor does not take your concerns seriously, you should speak to a more senior manager or the Environmental, Health and Safety Department. We never sacrifice safety in the interest of speed. Safety always comes first.

Q&A

Q: Do I really have to report a minor accident? No one was hurt. Nothing was damaged and no work time was lost. Why bother?

A: Reporting every incident is mandatory. This gives us the information we need to identify hazards and take corrective action before a more serious incident occurs.

Q&A

Q: I overheard one of my co-workers threaten someone. Should I step in?

A: No! You should report the incident immediately and let a security professional investigate before the violence escalates and puts you and your co-workers at risk.

2.3 COMPLYING WITH ENVIRONMENTAL, HEALTH AND SAFETY INSPECTIONS

Complying with U.S. environmental and safety laws includes periodic inspections of our worksites. State and local communities may also have policies we’re required to follow and regulatory agencies that verify and enforce the rules. All government inspection requests are legal matters. If anyone approaches you about an inspection, speak to your supervisor or a more senior leader in your department.

2.4 DETERRING WORKPLACE VIOLENCE

Words and actions that are intimidating or threatening, including bullying, assault and aggressive conduct, is considered workplace violence and is not tolerated at Enable Midstream. Except as otherwise provided in our Weapons Policy, you are not permitted to bring a weapon onto Enable Midstream property. Likewise, no weapons may be carried in Company vehicles. However, if State law differs from our policy, we follow the law first.

In the interests of safety, we act promptly to address any threats of violence. We also reserve the right to search our employees or their personal property. In the event of an immediate threat to people or property, call law enforcement immediately. Don’t delay. Take every measure to secure the safety of all your Enable Midstream colleagues. Remember:

- Treat others with respect at all times.
- Resolve situations calmly, never resorting to threats or intimidation.
- Watch for warning signs of potential violence, such as verbal threats, abuse of drugs or alcohol or destruction of property.
- In a non-emergency situation, report concerns to your supervisor, a more senior manager, Security or Human Resources.

Q&A

Q: I think one of my co-workers had a few drinks at lunch. She's slurring her words and seems unsteady on her feet. If I report her, will she lose her job?

A: For the safety of all concerned, you must report what you've witnessed immediately. It may be alcohol or drugs, or it may be another condition – an illness that needs to be identified or an adverse reaction to legitimate medication, in which case she would not lose her job. Whatever caused the suspicious behavior, there is a significant risk to having an impaired person on the job.

2.5 CREATING AN ALCOHOL AND DRUG-FREE WORKPLACE

Anyone who comes to work under the influence of alcohol or drugs creates a risk for everyone in the workplace. As a result, we prohibit the use, sale, purchase or possession of alcohol, illegal drugs and medications which have not been prescribed for you. Instead, you should report to work sober and ready to deliver your best performance.

To ensure compliance, Enable Midstream has a comprehensive drug and alcohol testing program run in accordance with federal and state laws. On occasion, there may be alcohol served at industry, customer, supplier or Company functions. In these cases, while you may consume alcohol if you are of legal age, your consumption should be in moderation to avoid intoxication.

2.6 SAFEGUARDING THE ENVIRONMENT

The raw energy we manage helps keep the world running. We take care to protect our world from hazardous materials and other environmental dangers. We respect the natural environment, operate safely and follow policies. We depend on you to promptly report any practice that violates our policies or could cause damage to the environment, properties or people involved. Contact the Environmental, Health and Safety Department with any questions or concerns or discuss them with your supervisor. Help us protect the environment.

2.7 PIPELINE SAFETY

Our commitment to safety and the environment includes the safe transportation of energy resources. We strive to prevent incidents by the policies we set and by the way that we build, run and maintain our assets. We also train our personnel to reduce consequences if an incident does occur. If you witness any violations of our policies or have concerns about any practices that threaten the integrity of our assets, immediately report them to your supervisor or contact the Pipeline Safety Department.

Lead with Integrity

Supervisors have additional responsibilities when it comes to protecting the environment:

- Train your team on environmental, health and safety policies.
- Consistently enforce our policies.
- Report non-compliance issues immediately.
- Promptly address all concerns that come to your attention.

Act with Integrity

- Put safety first in everything you do.
- Learn and practice the environmental, health and safety policies that apply to your job.
- Report every incident.
- Report any potentially violent situation before it escalates.
- Report any situation or equipment that appears hazardous.
- Handle all hazardous materials according to Enable Midstream policies.
- Consider the safety and environmental impact of your decisions.



Powered by Integrity

We not only follow the law, we live by impeccable professional and financial standards. You put that philosophy into action every time you choose to do the right thing.

3.1 COMPLYING WITH LAWS, RULES AND REGULATIONS

We follow both the letter and the spirit of the law everywhere we do business. It's our responsibility to know and obey the laws that pertain to the work we do and where we do it. Specifically:

- As a U.S. Company, we abide by all U.S. business laws.
- Because local laws vary from one location to another, we understand them and comply with them all.
- As a publicly-traded Company, we adhere to all SEC regulations.
- In addition, we follow all Enable Midstream policies, procedures, standards and processes which may be more stringent than the law.

Not all laws are clear-cut and readily known. It's important to ask for advice when situations are confusing or you believe there is a conflict between this Code and a law or between local and federal laws. Never hesitate to discuss a legal situation with your supervisor or the Law Department.

3.2 TRADING SECURITIES

In the course of your work for Enable Midstream, you may become aware of inside information, which is any confidential information that could affect an individual's decision to trade in our Company's or another company's securities. It doesn't matter if the information is positive or negative. Inside information is information that hasn't yet been released to the public, and because an investor would consider it important, it could affect stock prices. Here's how it might happen:

- While analyzing performance data, you realize that revenue has taken a significant upturn.
- When consulting on a deal, you find out that next quarter's earnings could change dramatically.
- In negotiations with a supplier, you discover they're about to acquire a company that will expand their capabilities.
- Working with one of our customers, you learn of a developing oil and gas play.

Using this knowledge to buy or sell securities or to give a "tip" to another investor is called Insider Trading and it is illegal. Those found guilty of this crime could face imprisonment as well as heavy fines.

Q&A

Q: What if a legal requirement conflicts with our Code?

A: We obey all laws as well as our Code and always follow the strictest standards. If there's any question or conflict, you should discuss the situation with your supervisor or the Law Department.

Q&A

Q: I know I can't trade on earnings information before they're released, but when people ask how things are going, can I respond with "Looking good" or some other vague statement?

A: No. Never give any positive or negative indication about our earnings. You may not share any knowledge that might influence an investment decision with anyone.

Q: I saw a report that indicates one of our suppliers is in trouble. I own stock in that company. Can I sell my securities?

A: That depends. Was the report you saw public information? If not – if you learned this information while it was still confidential – that would be insider information, and you may not take action.

So always remember: Although you may own company stocks, you may not make trade decisions based on information that's not yet public. This policy applies to:

- Trades involving Enable Midstream securities.
- Trades involving securities of all companies affiliated with Enable Midstream including CenterPoint Energy, Inc., OGE Energy Corp., our customers and our suppliers.

Making Ethical Trades

- Respect insider trading laws and make only ethical securities trades.
- Keep our Company's non-public information confidential. Do the same for any third parties with which we do business.
- Do not use confidential information to trade in our Company's or any other company's securities.
- Be careful not to give investment information or tips to others.
- When in doubt, ask for advice before you act.

At Enable Midstream, we do everything possible to reduce the risk or even the appearance of Insider Trading. We have our own Insider Trading Policy that details SEC regulations and our own requirements. Additional questions can be directed to the Chief Ethics and Compliance Officer or the General Counsel.

Q&A

Q: My wife works for a company that wants to be our supplier. Are they automatically disqualified from bidding on contracts with Enable Midstream?

A: No! We welcome proposals from all qualified partners. However, you need to report the relationship to your supervisor and the Chief Ethics and Compliance Office. In addition, you may not be involved in any decisions regarding that company. Likewise, you may not share confidential Company information with your wife or others at the bidding company.

Q: Can I take a second job to make some extra money through the holidays?

A: Yes, as long as it doesn't interfere with your responsibilities to Enable Midstream, and the second employer is not an Enable Midstream competitor or supplier.

3.3 AVOIDING CONFLICTS OF INTEREST

Your first loyalty belongs to our Company. Any personal interest that might interfere with your ability to put Enable Midstream first is a potential problem. Any activity that could cloud your business judgment is a conflict of interest and something you have to avoid, such as:

- Being employed by, consulting with or moonlighting for one of our competitors, customers, contractors or suppliers at the same time you're working for Enable Midstream.
- Owning a direct or indirect business or financial interest in a company that partners or competes with Enable Midstream.
- Making business decisions regarding a company if one of your immediate family members or someone you have a personal relationship with has an interest in it.
- Making business decision about job assignments, overtime, compensation and performance for a family member or someone you have a personal relationship with. Although multiple members of a family can work for Enable Midstream, a direct-report relationship with family members should be avoided.

Staying conflict-free is critical. But at Enable Midstream, we go above and beyond the legal requirements and avoid any situation that could possibly be seen as a conflict, even if it's not. If you experience a situation that could be interpreted as a conflict of interest, report it to your supervisor and the Chief Ethics and Compliance Officer immediately. Some situations may be acceptable, but do require the appropriate approval. These might include:

- A second job, if it interferes with your duties for Enable Midstream, including overtime demands.
- A position on an outside Board of Directors

3.4 MAKING POLITICAL AND CHARITABLE CONTRIBUTIONS

Enable Midstream supports your right to participate in the political process and in charitable causes. However, these activities have to take place on your free time. Also, any donations you pledge are solely your responsibility. If you're involved with a trade association or other industry group that advocates for government policies, you should discuss the matter with the Communications and Government Affairs Department before you participate.

Our Company also exercises our corporate right to make both political and charitable contributions.

If you become involved in an association, committee or political campaign:

- Discuss the nature of your role with your supervisor.
- In any speeches or commentaries, state that your views are your own and not those of our Company.
- Do not use Enable Midstream equipment, resources or Company time for your charitable or political activities unless you use volunteer time in accordance with our Paid Volunteer Time Policy.

Q&A

Q: Is it okay for a vendor to take me to a lunch where we discuss business?

A: Yes. Meals are a good way to build relationships with business partners. Do make sure the choice of venues and costs are not extravagant.

Q: A consultant offered me the use of his vacation home. We've already awarded him a contract for this year. Can I take him up on this offer?

A: This gift would be extravagant and could leave the impression that you are obligated to continue working with this consultant's firm. You should always discuss situations like this with your supervisor or a more senior leader.

3.5 GIVING AND RECEIVING GIFTS AND ENTERTAINMENT

If you're in a position to give gifts to or to entertain customers or suppliers or to receive gifts and invitations, you must be very careful. If gifts or entertainment are designed to build stronger working relationships and would not in any way appear to influence business decisions, they are perfectly acceptable. However, you should avoid any gifts or entertainment that's out of the ordinary or infers some kind of obligation.

An Appropriate Gift Is:

- Consistent with customary business practices such as sharing a meal or attending a sporting event.
- Moderate in value.
- Not intended to influence behavior.

An Inappropriate Gift Is:

- Cash or cash equivalent.
- Excessive in value.
- Offered for something in return.
- In violation of any law.

These rules apply to gifts and entertainment you give as well as receive. It is also inappropriate to ask for gifts or entertainment. Never request any gifts, entertainment, benefits or favors from customers or suppliers. If you're unsure whether a gift is appropriate, get the advice of your supervisor before you offer or accept it. In addition, you may not give or accept any gift or entertainment with a value in excess of \$250.00 without obtaining approval in advance.

3.6 WORKING WITH GOVERNMENT OFFICIALS

If you deal with any government official – domestic or foreign – you have to follow even more stringent rules about gifts and entertainment. To make government relations even more complex, these rules differ for different agencies and for federal, state and local branches of government. If you are in contact with government representatives, be sure to review and implement all the regulations that apply to that relationship.

If you ever deal with a foreign government official, you must also know and comply with the restrictions listed in the Foreign Corrupt Practices Act (FCPA), which prohibits practices such as bribery, kickbacks and other questionable incentives. The most important rule is to never give, offer or promise anything of value to foreign government employees, employees of government controlled businesses, political parties or candidates. The Communications and Government Affairs Department and the Law Department are available to answer questions and help you handle all government interactions ethically and legally.

3.7 AVOIDING IMPROPER PAYMENTS

All countries prohibit bribery, and U.S. laws are among the strictest in the world. We do not offer or accept bribes, kickbacks, concessions, payoffs or any improper payment of any kind. This mandate:

- Applies to every person with whom we do business – to government employees as well as private citizens.
- Covers direct payments to those in positions to make transaction decisions as well as indirect payments to intermediaries who would pass the benefit along.
- Includes any guarantee or discount not widely offered to other companies.
- Forbids any personal loans to or from customers, business providers or competitors.
- Prohibits any personal loan, payment or benefit to one of your immediate family members.

In every commercial transaction, our conduct is always honest, above-board and in full compliance with the law. Only authorize payments you know are legitimate and proper. If anyone approaches you with an offer that is improper, immediately report it to your supervisor or the Law Department.

Act with Integrity

- Learn to recognize a conflict of interest.
- Avoid any situations which could be interpreted as a conflict of interest.
- Only offer or accept gifts that are modest and would not influence someone's decision.
- Study the gift rules that apply to the government agencies and officials with whom you work.

Q&A

Q: A consultant had a line item in a proposed budget for government relations. Should I question it?

A: Yes. If a third party makes an improper offer or payment on our behalf, we are as legally responsible as they are. You should discuss our Code with the consultant and discuss the incident with your supervisor or the Communications and Government Affairs Department.

Powered by Customer Service

We set ourselves apart by offering exceptional customer service and comprehensive midstream expertise. When you put our customers’ best interests first, you also do what’s in the best interests of our Company.



4.1 FERC STANDARDS OF CONDUCT

The Federal Energy Regulatory Commission (FERC) regulates the transportation, storage and sales of natural gas in interstate commerce. Their Standards of Conduct are designed to protect both affiliated and non-affiliated customers. We do not discriminate against nor give preferential treatment to any company. We provide both current and potential customers with fair treatment and complete confidentiality.

We not only comply with FERC’s Standards, we’ve built them into our own procedures. Additional Standards of Conduct training is available for those with responsibility for relationships with FERC and with customers. You can also contact the Regulatory Department for advice on specific situations.

4.2 COMPETING FAIRLY

We respect our customers’ right to choose midstream service providers based on their needs and are eager to compete based on our capability, reliability, qualifications, cost and service. Our sales practices are fair and above board. We faithfully follow anti-trust laws that protect free enterprise and the competitive process and avoid any illegal or unethical activities such as:

- Taking advantage of market power to threaten or eliminate a current or potential competitor
- Sharing price information or agreeing to work with a competitor to fix prices
- Discussing capacity, territories, market share or bidding positions with our competitors
- Taking proprietary information such as competitors’ trade secrets either deliberately or accidentally
- Accepting proprietary information about competitors from others, including former employees of our competitors who now work with us
- Participating in trade association or industry group efforts to restrict membership, benchmark prices or improperly share commercial information and strategies
- Providing inconsistent information to different suppliers responding to a request for proposal, thus giving one or more suppliers a competitive advantage

Remember, even if you’re an Enable Midstream employee now, you may not use confidential knowledge about another company to advance our interests. If you signed any non-disclosure, non-solicitation or non-compete agreement with a previous company, make sure you disclose that to your supervisor.

4.3 ENSURING CONFIDENTIALITY

Confidential information includes any non-public facts, research or data that are propriety to our Company or to our customers and suppliers. You may not share confidential information with anyone – not with other employees or contractors or consultants or customers unless:

- The information is needed for a legitimate business purpose
- The persons with whom you share need to know this information to complete their work properly
- The persons with whom you share are fellow Enable Midstream employees or have signed a Confidentiality Agreement

You have a personal responsibility to protect whatever private information you encounter while doing your job. That includes any Company record that could be harmful to us or our affiliates or beneficial to our competition if divulged. Examples include:

- | | |
|---------------------|----------------------|
| • Business plans | • Patents |
| • Copyrights | • Performance data |
| • Databases | • Personnel records |
| • Designs | • Salary information |
| • Engineering ideas | • Sales forecasts |
| • Financial data | • Trade secrets |
| • Marketing plans | • Trademarks |

Q&A

- Q:** My supervisor asked me to share some confidential information with one of our consultants. Is there anything else I should do?
- A:** Yes. Before you share information, you should confirm that the consultant has signed a Confidentiality Agreement and understands our Code.

Q&A

- Q:** One of our suppliers has proposed expanding their services to us. They say they can prove the financial benefit if we share our current financial data. Can I do that?
- A:** You may share reports and information that have already been released to the public but you may not share any financial or performance information that is confidential without a Confidentiality Agreement.
- Q:** My cousin wants to pitch some of our customers and asked me to share my contact information. Since she is not in the same business as Enable Midstream, is it okay if I give her our customer list?
- A:** No. It doesn't matter if your cousin competes with us or not. Our customer list and other customer information is always held in the strictest confidence.

Much of this information is protected by law as well as ethical standards. Therefore, if you release or distribute confidential data, you could face criminal charges and financial penalties from civil suits. Even if you change employers, you must continue to keep Enable Midstream's information private. Likewise, if you had access to confidential information in a previous position, you may not share that knowledge with your new Enable Midstream colleagues. By protecting confidential information, we protect our competitive position as well as our commitment to fair practices.

Act with Integrity

- Serve our customers with integrity and pride.
- Obey all anti-trust laws and regulations.
- Treat competitors with respect.
- Protect proprietary information that belongs to our Company, affiliates and customers.

Powered by Teamwork

At Enable Midstream, everyone is expected to deliver their best performance. When we put our collective talents into action, no one can outperform us. When you show respect towards others, you make us an even stronger team.

5.1 PROVIDING EQUAL OPPORTUNITY

Our goal is to have the most qualified, dedicated workforce in the industry. To achieve that, we must attract, develop and retain the most reliable, skilled and talented people. As a result, Enable Midstream is an Equal Opportunity Employer. We follow all laws, offer employee opportunities equally and make decisions based on merit regardless of:

- Age
- Citizenship Status
- Color
- Disability
- Gender
- Gender Identity and Expression
- Genetic information
- Marital Status
- Military Status
- National original
- Race
- Religion
- Sexual Orientation
- Veteran Status

Our focus on equality results in a diverse and dynamic employee population that delivers exceptional results for our Company.

Q&A

- Q:** I have overheard a supervisor telling another supervisor that she would not hire a certain applicant because of his religious beliefs. Is this a violation?
- A:** Yes! Any comments or actions that show prejudice for a class of people violates our Code. You should report the incident to Human Resources.

Q&A

- Q:** An employee I used to supervise says her new boss is making sexual advances. She's afraid to report it for fear she will lose her job. What's the right thing to do here?
- A:** You must take action. Ignoring sexual harassment is not acceptable under any circumstances. You should report it to Human Resources. Do reassure your former employee that her job is not at risk, and she will be protected from any form of retaliation.
- Q:** I shared the funniest joke and everyone on my team liked it except one guy. Doesn't the majority rule in a case like this?
- A:** No. We want our workplaces to be comfortable and productive for everyone. "It was just a joke" is never an excuse. If there's any chance someone would be offended, do not share the joke.

5.2 PREVENTING DISCRIMINATION AND HARASSMENT

At Enable Midstream, we believe you have a right to work in an environment that is free from harassment or discrimination. Behavior that targets a person's race, color, sex, age, religion, national origin, disability, veteran status, sexual orientation or any other status protected by law harms us all, and it will not be tolerated. We treat everyone fairly and expect our employees to help keep acts of intimidation or hostility out of our workplace.

We also do not tolerate sexual harassment, which includes unwelcome touches, sexual advances, invading someone's personal space or discussing sex and telling jokes and stories that could be offensive. Any request for sexual favors in exchange for employment, promotions or other benefits is also sexual harassment and is strictly prohibited.

There are other kinds of harassment as well. Any action that makes our work environments hostile for others is harassment. The lines are not always clear. What one person intends as a joke or a compliment can be offensive to another person. Remember to treat everyone with respect and avoid anything that could be misunderstood such as:

- Insulting remarks, slurs and other degrading language
- Physical gestures and actions which disrespect others
- Posting, texting or emailing off-color materials like cartoons, jokes and articles with a prejudicial point of view
- Making remarks or jokes that denigrate a person or group of people
- Viewing offensive materials on the internet
- Anything that is harassing or intimidating

In summary, you have a right to come to a workplace where you are respected. If you are being harassed or sexually pressured or you feel as though you're the subject of discrimination, report it to your supervisor or Human Resources. If you witness or suspect any activity that's harassing or discriminatory, you also have a duty to report it. We will address all these issues promptly and fairly to ensure that Enable Midstream remains the best place to work.

5.3 SPEAKING ON BEHALF OF OUR COMPANY

When Enable Midstream speaks to the public, it must be with one consistent voice. That is how we protect our message and our reputation. Because our reputation is so important to our success, only authorized individuals may speak on our Company's behalf. Even if you receive a request for information, such as a request from the media or an investigating agency do not respond or make a statement. The information you have may be incorrect or incomplete. Or it may be confidential information. Instead, refer such inquiries to communications@enablemidstream.com.

5.4 PURSUING BUSINESS OPPORTUNITIES

As a representative of Enable Midstream, you may be presented with or made aware of new business opportunities. These opportunities always belong to our Company. You may not take an opportunity for yourself or compete with Enable Midstream in any way. In fact, you have a duty to advance Enable Midstream's interests.

Even if someone approaches you personally, you must first offer the opportunity to our Company. Talk to your supervisor or the Chief Ethics Officer, who will consult with other leaders to determine whether or not it's a good opportunity for Enable Midstream. If we reject the proposal, you may be able to pursue it on your own. However, the terms and conditions must be the same as those offered to our Company, and you must get written approval before pursuing it. By safeguarding our Company's prospects, we also protect the future of every employee.

Act with Integrity

- Show respect for everyone.
- Take care with your words and actions.
- Always act in our Company's best interest.

Q&A

- Q:** Through my work with a customer, I have found out about a business opportunity that doesn't seem like something Enable Midstream will be interested in pursuing. I'm considering mentioning the opportunity first to a friend of mine who works for a competitor. Is that OK?
- A:** Probably not. Since you represent Enable Midstream, all opportunities you uncover have to be offered to our Company. You have a duty to present the opportunity to Enable Midstream first. We must then determine if it is right for our Company.

Powered by Accountability

We are accountable to our customers, our shareholders our customers and each other. Your day-to-day diligence and honesty help us maintain our integrity and our customers’ trust.

6.1 KEEPING HONEST ACCURATE RECORDS

Error-free records are essential to smart business decisions. To plan properly, we need to know the facts about time, personnel information, productivity, quality assurance, commissions, costs, finances and more. In addition, there are legal requirements we’re required to follow and, if these documents were ever used in an investigation or audit, we want them to prove that we are a trustworthy and reliable Company.

Therefore, all of our books, records, accounts and financial statements must be maintained properly. We have internal controls and policies in place for that purpose. Become familiar with all the policies, procedures, standards and processes that apply to the work you do and be sure to maintain all records and business communications in accordance with our record retention policies.

Equally important, each of us has a duty to report accurate and complete information. Withholding information and providing inaccurate information are equally wrong. Likewise, never exaggerate, guess or omit any information under any circumstance. Also avoid any derogatory remarks or inappropriate characterizations of the people or companies you encounter. Instead, keep your reporting factual, honest and professional.

There is no excuse for deliberately falsifying or altering any record and such actions will not be tolerated at Enable Midstream. Never ask someone to change a record. If anyone asks you to record false information, you must refuse and then report the incident. Failing to report also violates our Code. If you ever suspect a record has been deliberately altered, contact your supervisor, a more senior leader or Internal Audit without delay.

Q&A

Q: Checking every invoice that crosses my desk is very time-consuming. Besides, I trust the employees who submit them and the clerks who prepare them. Do I still have to verify every invoice?

A: Yes. If you approve any record, you are responsible for its accuracy. Always verify the charges in every invoice.

Q: Does my supervisor have the authority to make me charge an incorrect work order or account?

A: No! If you record a transaction, you’re responsible for its accuracy. If your supervisor asks you to do something unethical, report it to a more senior leader or the Chief Ethics and Compliance Officer.

If an error does occur, it must be addressed as soon as it’s discovered. It doesn’t matter when the mistake was made or how minor it might be. Any and all errors must be reported. If appropriate, we will also inform affected customers or business providers. We will always do everything in our power to ensure that our records accurately chronicle our operations and prove our commitment to the people who rely on us.

6.2 RECORDING ACCURATE WORK-TIME RECORDS

Work time is one record every employee and contractor must complete. Every time you submit your time record, you’re committing to its accuracy. Report all the time you’ve worked and only the time you’ve worked. You may not report more time than you actually logged, nor is it acceptable to work hours that you don’t report, particularly if you’re an overtime-eligible employee. Never ask someone else to help you misrepresent your work time or agree to help someone falsify a time record in any way. That’s asking them to violate our Code and they could be disciplined along with you.

To ensure accurate records:

- Precisely follow the reporting procedures for the activities you perform.
- Complete record-keeping activities in a timely manner.
- Take responsibility for the accuracy of the information you submit.
- Report every hour you work.
- Bring any and all errors you find to your supervisor’s attention.

Q&A

Q: I think one of my co-workers reported more hours than we actually worked, but our supervisor approved it. Do I still need to file a report?

A: Yes. Any possibility of a time reporting error – whether it was made on purpose or by mistake – must be reported immediately. We’re all responsible for conducting business fairly and reporting any questionable conduct.

All questions about time reporting and wages should be directed to Human Resources. That includes concerns about the accuracy of your wages or deductions and any other pay issues. If you believe there was a deliberate error or an error that has not been properly addressed, you can also talk to your supervisor or a more senior leader.



6.3 FILING PROPER PUBLIC REPORTS

Enable Midstream units trade on the New York Stock Exchange (NYSE), and both the NYSE and the Securities and Exchange Commission (SEC) require us to file regular reports and documents. Since these legal and accounting matters are so complex, we have disclosure controls and procedures in place to ensure that information is collected properly and that all our disclosures are full, fair, accurate, timely and understandable.

We strive to achieve those same high standards in our public reporting as well. When we issue press releases and other public and investor statements containing information about our business operations and financial condition, we take great care to ensure that they are complete, truthful and accurate.

Although the ultimate responsibility for all these communications rests mainly with senior leadership, many of us provide information that is subsequently compiled into these reports. It's important to:

- Submit information correctly, in a timely manner and in accordance with the Enable Midstream policies and procedures that govern that activity.
- If you are asked to provide additional information or to review or certify information for disclosures, respond quickly and fully.
- If you believe you have information that should be included in our disclosures, bring it to our attention.

Audits are another important part of the public reporting process. Regardless of whether it's an internal or external audit, we have a responsibility to cooperate. In fact, it's illegal to take any action that could mislead, manipulate, coerce or otherwise fraudulently influence any audit or auditor.

We are eager to prove our accountability to our shareholders and governing agencies. Help us maintain integrity by communicating fully and truthfully about our financial records. Ask questions whenever situations are unclear and seek the advice of your supervisor or a more senior leader to show your commitment to our values and our Company's dedication to proper public reporting.

Q&A

- Q:** In a quarterly financial statement, I think we counted sales that were booked but not yet finalized, which inflated our sales figures. Is this just a professional difference of opinion or is it a legitimate problem?
- A:** It's an issue that should be investigated so we can determine the correct answer. Talk to the Internal Audit Department or the Enable Helpline.

6.4 USING SOCIAL MEDIA

Social media has become a common way to stay in touch with family and friends. It's also a powerful way for our company to connect with customers, colleagues and the world. While we do encourage our employees to understand and utilize this technology, social media should be used responsibly.

When using personal social media, avoid giving the impression that you are authorized to speak on behalf of the Company. If you choose to disclose your position with the Company, use a disclaimer when publishing content related to Enable Midstream, such as "I'm not an official spokesperson for Enable Midstream, but my personal opinion is . . ." or "Although I work for Enable Midstream, my personal opinion is . . .".

When you do use social media:

- Remember that you are responsible for the content of your public posts, so be considerate, honest and inoffensive.
- Always strive to be accurate in your communications about our Company.
- When using personal social media, make it clear that you're speaking on your own behalf.
- Don't use our Company's logo, defining colors, or other intellectual property without authorization.
- Make sure to comply with our policies regarding the disclosure of our Company's and our customer's proprietary and confidential information.

Our Code and our policies are not intended to preclude or dissuade employees from engaging in legally protected activities such as discussing wages, benefits or other terms and conditions of employment.

Q&A

- Q:** Is it okay to state my position and responsibilities with Enable Midstream on professional social media sites?
- A:** Yes, as long as you do not disclose any confidential or proprietary information or claim to speak on our Company's behalf.

6.5 PROTECTING COMPANY ASSETS

We all use our Company’s resources to do our jobs properly. With that use comes the responsibility to protect those assets. For example:

- Always guard against carelessness and waste that have a direct negative impact on our profitability.
- Use Company assets for Enable Midstream business.
- Never tolerate an act of fraud or theft. If you witness any suspicious act, report it immediately.

The different communication devices and networks that keep us connected are also key corporate assets. It’s important that you understand how these tools may or may not be used.

You may use Company-issued devices for personal communications as long as you do it minimally, infrequently and appropriately. Do not download or stream videos or games since that would divert bandwidth needed elsewhere. But an occasional check on the Internet or a quick email is acceptable.

As you would expect, using our communication systems for any illegal or unethical activity is unacceptable. Likewise you may not use any of our resources for another company or business – not even your own. You should also exercise good judgment in the messages you share and keep all your language professional. Remember, as a key corporate asset, our systems and your communications could be monitored. You have no expectation of privacy on a Company device or system.

Every time you use a Company communications vehicle, you must also follow our cyber security policies to prevent hacking, viruses and other risks to our digital networks. By respecting the resources we have at our disposal and reserving them for Company use, we improve our bottom line and our value to everyone affiliated with Enable Midstream.

Act with Integrity

- Be honest in all your reporting and accountable in all your actions.
- Take care of the corporate assets you use.
- Record all official information according to proper procedures.
- Disclose any and all information that could be material.
- Cooperate in any authorized investigation.
- Keep personal use of Company communication devices and networks to a minimum.

Living Our Values

As a Company, we’ve defined our core values. But you’re the one who applies our principles, follows our policies and shows respect for everyone. You secure our safety, power our teams, serve our customers, demonstrate our integrity and take responsibility for doing everything right. In other words, you put our values into action and when you do, we earn the confidence of our customers and communities and every one of us reaps the benefits.



Q&A

- Q:** My brother is starting a new business. If I do the work on my own time, can I use my Enable Midstream software to run an analysis for him?
- A:** No. It would not be appropriate to use our resources to benefit another company regardless of who that other company is.
- Q:** I check the internet a couple times a day – just for a minute or two – to look at the weather or stock market. Is this acceptable use of a Company device?
- A:** Yes. It’s limited, reasonable use.



A PARTNER IN YOUR SUCCESS®

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The Code of Business Conduct and Ethics was approved by the Board of Directors of Enable GP, LLC in February 2017.