

TGS Whistleblower Policy

TGS is committed to creating an environment where employees and contractors (collectively “**Employees**”) feel comfortable and confident to ask questions, seek advice and raise concerns within the company. This policy outlines a procedure for Employees to report actions that an employee suspects violates the TGS Code of Conduct, a law, or any other regulation.

If an Employee suspects that an Employee or TGS has engaged in any action that violates the TGS Code of Conduct, any applicable law, regulation, or any other action that constitutes a fraudulent practice, the employee is expected to immediately report such information. TGS recognizes that raising potential issues is not always easy, and therefore, TGS has provided several avenues for you to report concerns:

- Notify your manager or your manager’s supervisor if you become aware of any activity you think is a violation of the Code of Conduct or applicable law
- Contact TGS’ Compliance Department via email, phone, or in-person (**compliance@tgs.com** or **(713) 860-2201**)
- Report your concern, anonymously if preferred, to the TGS Hotline which is available here: **www.tgs.ethicspoint.com**

All reports will be followed up promptly, and an investigation will be conducted under the Compliance Department’s supervision. TGS expects its Employees to cooperate in the investigation of suspected violations. The Compliance Department will not, to the extent practical and appropriate under the circumstances and the law, disclose the identity of anyone who reports a suspected violation or who participates in an investigation. Because failure to report criminal activity can itself be understood to condone the crime, we emphasize the importance of reporting. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

TGS will not tolerate any form of retaliation directed against any person who raises a concern in good faith about a possible violation of the Code of Conduct or the law, even if the report does not turn out to be an actual violation, or who cooperates in any related investigation or proceeding. Any threat or act of retaliation against TGS Employees will be treated as a serious violation of the Code of Conduct. Acting in good faith means that you have made a sincere report in a responsible manner through any of the channels listed above.

All reports made, along with any related information, will be kept strictly confidential in accordance with applicable laws and TGS policies. Any personal data collected as part of a report will be processed in accordance with the TGS Privacy Policy. Relevant documentation that must be shared with the Board of Directors for the purposes of annual compliance reporting will be anonymized unless otherwise required under applicable laws.

Employees will be trained on this policy and TGS’ prohibition against retaliation in accordance with this policy.