
INTRODUCTION

Targa Resources Corp., including all subsidiaries (collectively “Targa”), considers each employee¹ a valuable and irreplaceable individual. The health, safety, and security of each individual and of Targa, depend, in part, on our collective ability to recognize and eliminate alcohol and Substance² abuse from the workplace. Targa is committed to preventing the use and/or presence of alcohol and Substances in the workplace.

Targa’s Alcohol and Substance Abuse Policy is to maintain a safe, healthful, and productive work environment for all employees. To that end, Targa will act to eliminate alcohol and Substance abuse in the workplace or otherwise on Targa’s Premises.³ Alcohol and Substance abuse can increase the potential for accidents, absenteeism, substandard performance, poor employee morale, and damage to Targa’s reputation.

Employees of Targa are not allowed to manufacture, distribute, use, possess, or be impaired by unauthorized alcohol or Substances in any manner on Targa’s Premises at any time during employment, while in a Targa vehicle, or when attending a Targa-sponsored function off of Targa’s Premises. All contractors, subcontractors, their employees, agents, and visitors must comply with Targa’s Alcohol and Substance Abuse Policy.

PROHIBITED CONDUCT AND ACTIVITIES

Certain activities on Targa’s Premises are considered prohibited. These prohibited activities of misconduct include, but are not limited, to the following:

- 1) The unlawful manufacture, distribution, dispensing, possession, or use of Substances, or drug paraphernalia.
- 2) The use, sale, or possession of alcohol other than: (i) as may be authorized by appropriate management; (ii) the possession of unopened containers of alcohol in one’s personally owned vehicle while on Targa’s Premises; or (iii) the making or accepting of gifts containing alcohol provided the gifts are not opened while on Targa’s Premises.
- 3) Reporting to work or working with the presence of alcohol and/or Substance in the employee’s system in excess of the applicable minimum amount found in the current Department of Transportation regulations.
- 4) Refusal to comply with alcohol and Substance testing program schedules and instructions, or adulterating, diluting or otherwise attempting to alter or altering a specimen for alcohol or prohibited Substance testing. Refusal to comply includes: (i) failing to provide an adequate breath or urine specimen for testing without a genuine inability to provide a specimen (as determined by a medical evaluation by a

¹ All Targa employees are employees-at-will and either Targa or the employee can terminate the employment relationship at any time, with or without notice, and without cause. Targa reserves the right to change or deviate from its published policy, practice, and procedure at any time without prior notice as circumstances or business needs dictate. This policy, practice, and/or procedure *is a guideline only and does not create a legally binding document.*

² For purposes of this Alcohol and Substance Abuse Policy, the term “Substance” includes marijuana, controlled substances, illegal drugs, hallucinogens, prescribed and over-the-counter medications, and any other substance that may be inhaled, injected, ingested, or introduced into the body in any other way that may affect an individual’s performance or judgment.

³ For purposes of this Alcohol and Substance Abuse Policy, the term “Premises” shall mean any land, building, structure, office, facility, plant, or property owned, leased, or rented by Targa.

physician) after receiving notice of the requirement for breath or urine testing; (ii) abusive conduct toward medical personnel; (iii) behavior that obstructs the testing process or search process; and/or (iv) not appearing at a designated test site at the designated time.

- 5) Employees may not use any prescription or over-the-counter medication while performing safety sensitive job duties, if that use may negatively affect the employee's ability to perform their job safely. Employees are expected to consult with their medical providers to determine whether any prescribed or over-the-counter medication may have side effects that may impact their safe performance. Employees are required to immediately notify their supervisors of any work restrictions related to prescribed or over-the-counter medications.
- 6) Employees must not report to work and will not be allowed to work if the Employee is impaired by alcohol or Substances. Employees who are designated as being "on-call" are expected to comply with the above guidelines by remaining able to report to work free of any alcohol or Substances that could impair their ability to perform their work safely. Employees who are not "on-call" and are called out to work in an emergency situation, are required to notify their supervisor of any alcohol or Substance use that could impact their performance.
- 7) Any other conduct that violates this Alcohol and Substance Abuse Policy and/or the Department of Transportation's Drug and Alcohol Testing regulations.

SEARCH, SCREENING, AND INSPECTION

Management will determine when search and/or screening procedures are required at Targa to provide a safe work environment or to protect Targa's assets, property, or Premises. Targa reserves the right, at management's discretion, to have authorized personnel conduct searches or inspections of Targa property or of personal effects brought on to Targa's Premises, including but not limited to, bags, lunch boxes, tool boxes, brief cases, computer bags, purses, mail or packages received at Targa, and vehicles of employees, contractors, and other personnel for the purpose of determining if any such persons are in possession of any prohibited alcohol or Substances. For purposes of this policy, the term "Targa property" includes, without limitations, desks, computers, lockers, vehicles, and other equipment.

Refusal to submit to searches and/or screening shall be cause for denial of employment or disciplinary action, up to and including, termination of employment, and removal from Targa's Premises.

ALCOHOL AND SUBSTANCE ABUSE SCREENING

Alcohol and Substance abuse screening will be conducted, as necessary, to assure compliance with applicable federal and state laws, adherence to Targa policy, and to complete investigations into the potential causes or contributions to accidents, injuries, and performance-related difficulties. Targa may test for the presence of alcohol and any and all Substances, including but not limited to: marijuana, cocaine, opiates (including heroin, morphine, hydrocodone, and codeine), amphetamines (including methamphetamine), barbiturates, benzodiazepines (Valium, Xanax), methadone, phencyclidine (PCP), or any new illegal drug not yet named.

Alcohol screening will be by evidential breath testing ("EBT") device. EBT devices will be provided and operated by Targa-approved testing services. Urine specimen collection, for alcohol and the above stated Substances, will be conducted by appropriately qualified clinics, hospitals, medical professionals, or medical facilities approved by Targa. Urine specimens will be collected by using the containers and chain of custody documents provided by Targa and will be tested at the laboratory designated in the shipping instructions included with the kits. Under no circumstances are Targa employees allowed to collect samples.

Unless otherwise prohibited by law, alcohol and Substance abuse screening will be conducted under the following circumstances:

1. Pre-employment / Pre-placement Screening:

All applicants offered employment by Targa will be required to undergo a Substance test before beginning employment. If an applicant refuses to be tested, or has a verified, confirmed-positive Substance test result, Targa will eliminate the applicant from consideration for employment or assignment. Targa reserves the right to Substance test a contract worker prior to placement in a contract position where permitted by law.

2. Reasonable Cause Testing:

If physical, or performance-based indicators of possible alcohol or other Substance abuse are indicated to supervisors or other employees by an employee's behavior, such employee may be subjected to alcohol and/or Substance testing due to reasonable cause (also referred to as reasonable suspicion). Should an employee witness any such behavior, the employee should immediately notify the employee's supervisor or Human Resources. Targa reserves the right to alcohol and Substance test employees or contract workers for reasonable suspicion where permitted by law.

3. Post-Accident Screening

Each employee, contractor, or contract worker whose performance either contributed to an accident or cannot be completely discounted as a contributing factor to an accident will be subject to post-accident alcohol and/or Substance testing as part of Targa's investigation into the causes of the accident.

If an employee, for whom post-accident screening is required, is injured, unconscious, or otherwise unable to grant consent to a alcohol and/or Substance testing, reasonable steps will be taken to obtain a specimen as permitted by law.

4. State or Federally Mandated Testing:

Employee, contractors, and contract workers will be required to submit to alcohol and/or Substance testing when required by State or Federal laws or regulations, including testing in conformance with the requirements of Department of Transportation ("DOT"). DOT testing includes pre-employment, random, and post accident testing for those employees in DOT-covered positions, and return-to-work and follow-up tests for individuals who have previously violated DOT alcohol and Substance rules. If a position is a DOT-covered position, then an employee will be so notified at the time of hire, time of transfer into a DOT-covered position, or at the time a position becomes a DOT-covered position subject to DOT random testing.

NOTE: A copy of the Targa Anti-Drug and Alcohol Misuse Prevention Plan is located on Targa's intranet under MyTarga / Human Resources / Employee Only Documents / DOT Program section and available to all employees.

5. Negative Diluted Specimen Testing:

If an alcohol and/or Substance test for any applicant, employee, contractor, or contract worker results in a negative diluted specimen, then Targa reserves the right to have the individual submit to a recollection without advance notice.

6. Unannounced or Random Testing:

Employees, contractors, and contract workers may be submitted to alcohol and/or Substance testing on an unannounced or random basis by Targa. All such alcohol and/or Substance testing will be unannounced and will be based on a targeted sampling of employees, contractors, and contract workers and/or work sites (which may include all employees, contractors, and/or contract workers at a given

location) at the discretion of Targa. Unannounced or random alcohol and/or Substance testing will be conducted in accordance with applicable state laws.

7. Return-To-Work Testing:

An employee who self reports alcohol or other Substance abuse before being suspected of a policy violation, may be permitted to return-to-work, provided the employee is first evaluated by a Targa-approved Substance-Abuse Provider (“SAP”) and successfully completes any course of treatment recommended or prescribed. As a condition of continued employment, the employee will be required to sign a return-to-work agreement. Before returning to work, the employee must take and pass a return-to-work alcohol and/or Substance test. Any employee who fails a return-to-work test will be terminated from employment immediately.

8. Follow-Up Testing:

An employee who self reports and completes the prescribed treatment and return-to-work testing as described above, must submit to frequent unannounced alcohol and/or Substance tests for a period of up to five (5) years, or as recommended by the employee’s SAP. Employees who test positive on a follow-up test will be terminated from employment immediately. Employees in covered positions who are subject to DOT return-to-work requirements as a result of prior DOT policy violations will be subject to follow-up testing as prescribed by their SAP.

PROCEDURES FOR ALCOHOL AND SUBSTANCE TESTING

- **Consent:** No alcohol test may be administered, sample collected, or Substance test conducted on any sample without the written consent of the person being tested. However, a refusal to submit to an alcohol and/or Substance test will be viewed as insubordination and will be subject to disciplinary action, up to and including, termination.
- **Collection and Chain-of-Custody:** Persons being tested will be asked to provide a test sample by the collection site person or medical personnel. Procedures for the collection of specimens will allow for reasonable individual privacy subject to applicable laws. Urine specimens will be tested under appropriate validation procedures. The collection site person and the person being tested will maintain chain-of-custody procedures for specimens at all times.
- **Right to Retest:** An individual who tests positive for alcohol and/or a Substance may, within seventy-two (72) hours of notification of a positive test result, request that the individual’s original urine sample be sent to an independent laboratory certified by the Substance Abuse and Mental Health Services Administration for a second confirmatory test, at the individual’s expense. Targa may suspend the employee without pay, transfer the employee temporarily to another position, or take other appropriate action pending the results of any such re-test.

CONFIDENTIALITY

All records relating to positive test results, Substance and alcohol dependencies, and employee medical information shall be kept confidential, and disseminated to and within Targa only on a need-to-know basis. Such records will be kept in files separate from personnel files. Targa is required by DOT regulations to report positive alcohol and/or Substance test results to future prospective employers if requested by a company that has provided a signed Applicant Authorization to Release DOT Drug/Alcohol Test Results Form. Test results will not be released outside of Targa without the written consent of the tested individual, except in a legal or administrative proceeding brought by the individual against Targa or as otherwise required by law.

EMPLOYEE SELF REFERRAL

Employees who voluntarily seek help for alcohol and/or Substance abuse (“self-referral”), prior to being asked to submit to a alcohol and/or Substance test, will be provided an opportunity to pursue counseling and rehabilitation. Targa will make available to these employees information about nearby counseling and rehabilitation services. Employees in DOT-covered positions will be required to follow a treatment program as outlined by a SAP certified by DOT. Employee health insurance may help defray the costs of treatment. An employee who is receiving counseling and/or rehabilitation treatment may be required to take time off work to comply with the assigned treatment program or until released by the treatment provider as alcohol and/or Substance free and safely able to resume work. The time off work may be covered by Targa’s paid time off policies if the employee has time available. The time off may also qualify for Family & Medical Leave if the employee meets the eligibility requirements. The employee may return-to-work only after successful completion of a prescribed treatment program. The employee will be subject to follow up alcohol and/or Substance screening as previously outlined in the Alcohol and Substance Abuse Screening section of this Policy.

Since a decision to seek treatment can neither excuse nor protect an employee from the consequences of failing to meet job expectations or for engaging in policy violations, Targa encourages employees to seek assistance before such problems develop. Employees who have a question about employee assistance resources, may contact Human Resources or the Employee Assistance Program provider as listed on the Targa intranet website.

CONSEQUENCES OF POLICY VIOLATIONS

Targa has “zero tolerance” with respect to individuals who violate this Alcohol and Substance Policy. The consequence of a policy violation for an employee is disciplinary action, up to and including, termination of employment, for a contractor is termination of the contract or assignment, and for a job applicant is elimination from consideration for employment or assignment.

COMPLIANCE WITH ALL APPLICABLE LAWS

Targa will implement and enforce this Alcohol and Substance Abuse Policy, including the alcohol and other Substance testing sections, in a manner that complies with all applicable federal, state, and local laws, rules, and regulations.

INTERPRETATION OF POLICY

Please contact Targa’s Human Resources Department for interpretations or assistance with this policy.