



**PROCEDURES FOR THE SUBMISSION OF COMPLAINTS AND CONCERNS
REGARDING ACCOUNTING, INTERNAL ACCOUNTING CONTROLS OR AUDITING MATTERS**

Rule 10A-3(b)(3) under the Securities Exchange Act of 1934, together with Rule 5605(c)(3) of the NASDAQ Listing Rules, require the Audit Committee of the board of directors to establish procedures for: (a) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters; and (b) the submission by employees of the Company and others, on a confidential and anonymous basis, of concerns regarding questionable accounting or auditing matters.

In accordance with these rules, the Audit Committee has adopted the following procedures:

1. All complaints regarding accounting, internal accounting controls, or auditing matters shall be submitted either:
 - a. in writing and mailed to the attention of the Compliance lead at the following address:

Altus Midstream Company
2000 Post Oak Boulevard, Suite 100
Houston, Texas 77056
 - or
 - b. by contacting the Hotline at one of the following numbers:

U.S. – 866-756-2599
International Toll Free – 800-5588-1345
 - or
 - c. by submitting an online report to the Hotline at www.altusmidstream.com/hotline.

2. Complaints and concerns may be submitted to the Company through the methods outlined above by a party on a confidential, anonymous basis if the party elects to do so. In order to facilitate a complete investigation, however, any party submitting a complaint must provide as many details as possible, including a description of the alleged questionable practice, any potential witnesses, as well as any available details concerning the date(s), time(s), and location(s) of the alleged questionable conduct or practice.

3. Complaints or concerns covered by these procedures and regarding a member of the Compliance team may be submitted in writing and mailed to the Chief Executive Officer at the Company's address given above. If a complaint involves both the CEO and a member of the Compliance team, then the concern may be directed to the Audit Committee Chairman by mail to the Audit Committee Chairman c/o Corporate Secretary at the Company's address given above.
4. These procedures relate to complaints and concerns relating to any accounting matters. By way of example, and without limitation, accounting matters include the following: (i) fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company, (ii) fraud or deliberate error in the recording and maintaining of financial records of the Company, (iii) deficiencies in or noncompliance with the Company's internal accounting controls, (iv) misrepresentations or false statements to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company, and (v) deviation from full and fair reporting of the Company's financial condition.
5. Anonymity will be maintained to the fullest extent of the law for those complainants who do not disclose their identities.
6. The Compliance team shall use reasonable efforts to protect the confidentiality of any complainant who makes a written request for confidentiality. However, information will not be withheld from the Board of Directors, from the Chief Executive Officer (unless he is personally accused), or from the Company's legal counsel, and information may be disclosed by the Company under the direction of the Audit Committee to the extent required by law or deemed necessary by the Audit Committee or the Company's legal counsel in order to complete an effective investigation.
7. The Compliance lead shall consult the Chief Executive Officer, and, together, they shall make a recommendation to the Audit Committee regarding whether each complaint or concern received by the Company and subject to these procedures warrants investigation (provided that the complaint involves neither a member of the Compliance team nor the Chief Executive Officer), but the Audit Committee shall make the decisions of whether and how to conduct an investigation.
8. The Audit Committee may direct or conduct such investigation as it deems appropriate, after consultation with the Chairman of the Board, the Chief Executive Officer, and the General Counsel of the Company in each case, as appropriate. The Audit Committee may consult with outside counsel in making determinations pursuant to this policy.
9. The Company shall retain copies of all such concerns and complaints together with a record of the results of Audit Committee investigations of any such complaints or concerns for a period of not less than three years.
10. The Company does not permit retaliation of any kind against employees on account of complaints submitted hereunder that are made in good faith. Nothing in this policy is intended to limit the Company's ability to terminate an employee for other causes, including, without limitation, violations of law or Company policy, and nothing in this policy will be interpreted to negate the Company's policies regarding employment at will.