



Addendum to Enbridge's 2013 Corporate Social Responsibility Report (with a focus on 2013 data)

Ethics/Fair Operations Performance Data Sheet

This performance data sheet relates to the following Global Reporting Initiative (GRI G3.1) Standard Disclosure:

- Profile – Strategy and Analysis

Context

We aim to operate our business to the highest ethical standards, with integrity, respect, honesty and transparency.

Since 2004, we have had a CSR Policy covering business ethics and transparency; environment, health and safety; stakeholder, Aboriginal and Native American relations; employee relations; human rights; and community investment. This policy applies to activities undertaken anywhere in the world by, or on behalf of, Enbridge and our subsidiaries and affiliates, whose operations we manage.

As we state in the policy, we define CSR as: conducting business in a socially responsible and ethical manner; protecting the environment and the safety of people; supporting human rights; and engaging, learning from, respecting and supporting the communities and cultures with which we work. In our CSR reporting and disclosure we use the terms CSR and corporate sustainability interchangeably.

Management Approach and Background

Our commitment to ethical behaviour and fair operations is derived from one of our core values: Integrity.

Our Integrity value is embodied in our Statement on Business Conduct, which requires employees to make decisions about Enbridge's business in a responsible, honest and ethical manner. Our Statement on Business Conduct and Whistle Blower Procedures require employees to report (either directly or anonymously) any fraudulent activities or potential or actual events that do not comply with applicable legal requirements or Enbridge policies.

Compliance Policy and Programs

We have established a Compliance Policy that defines clear responsibilities for Enbridge's Vice President & Chief Compliance Officer and the responsible business unit Compliance Officers who oversee our Compliance Program, which is designed to minimize unethical behaviour and support and demonstrate our commitment to corporate responsibility and good governance.

As part of our Compliance Program, we routinely undertake the following best practices to monitor and improve upon our compliance and ethics culture:

Policies: We have established a number of governance policies that are designed to ensure that our employees conduct their work activities in accordance with applicable laws. These policies include the Statement on Business Conduct, the Whistle Blower Procedures and the Compliance Policy.

Business units throughout Enbridge have incorporated our core values—Integrity, Safety and Respect—and our Statement on Business Conduct into their supply chain management policies, practices and procedures. MP, for example, has adopted a Supply Chain Management Protocol that states that all supply chain management activities must be conducted in an ethical manner that delivers the best value for Enbridge, while ensuring adherence to our values, Statement on Business Conduct and Compliance Policy.

Ethics and Conduct Hotline: We provide information to all employees and contract workers on the avenues available to them to raise ethical or compliance issues directly with the responsible Compliance Officers or with other managers. We also maintain an Ethics & Conduct Hotline (Hotline) that employees can use at any time to raise issues anonymously through a third-party provider. Each report received through our Hotline is provided directly to Enbridge's Vice President & Chief Compliance Officer, as well as to the responsible business unit Compliance Officer, and is investigated to address and resolve any issues raised.

In 2013, we received 107 new Hotline reports, of which 65 related to human resources issues, 17 related to financial concerns, eight related to allegations of misappropriation or misuse of assets, eight related to safety issues, five related to policy and process integrity, and four related to requests for information. In 2012 we received 58 reports to the Hotline. We believe that the increase in 2013 was due to the efforts we have made to ensure that employees and contractors know about the Hotline.

Tone At the Top: Since 2009, we have had a Chief Compliance Officer, as well as Compliance Officers in our three primary operating business units. In early 2012, we changed our management structure to demonstrate an even greater emphasis on compliance and ethics, and appointed our first dedicated enterprise-wide Vice President & Chief Compliance Officer. This position is responsible for the oversight of Enbridge's overall state of compliance and for enhancing our culture of ethics and integrity.

Internal Audit: Our Internal Audit Department plays a key role in monitoring compliance by providing assurance on the effectiveness of governance, risk management, and internal controls. Internal Audit is responsible for measuring efficiency and effectiveness of operations, safeguarding of assets, risk management, and monitoring the internal control framework and compliance with laws, regulations, policies, procedures and contracts. Internal Audit also assists with investigations into any unethical conduct, including allegations of bribery, fraud and corruption.

Training: In early 2014, we provided on-line training to all Enbridge employees and provisioned contractors on our Statement on Business Conduct. The training required them to certify their compliance with the Statement on Business Conduct for 2013 and to declare any actual or potential conflicts of interest.

In 2013, we provided privacy training to targeted employees and provisioned contractors in Canada who have access to personal information.

Also, in December 2013, we formally rolled out our Compliance and Ethics Management System and compliance and ethics processes to LP employees. We will be complementing this roll-out with an integrated management strategy and plan that we intend to implement throughout 2014 to ensure that we have targeted, efficient and streamlined training and education for employees and contract staff regarding the management systems.

Compliance Investigations and Reports: Our Compliance Officers coordinate investigations into material compliance matters, whether they arise directly from employees, through incidents or via reports to the Hotline. Enbridge's Vice President & Chief Compliance Officer reports all material events of non-compliance arising from Hotline reports, auditing matters and general ethics issues to the Audit, Finance & Risk Committee of Enbridge's Board of Directors. Additionally, since November 2013, we have reported all material reliability, environmental, health and safety non-compliance matters to the new Safety & Reliability Committee of our Board of Directors.

Non-Retaliation: We are committed to the principle that no retaliatory action may be taken against anyone who raises non-compliance issues in good faith. Adhering to the non-retaliation principle is a key component of a strong culture of compliance and it also ensures that employees, contract workers and the public can feel confident that we will review and address issues in a fair and impartial manner.

Metrics: We maintain a compliance index metric that ties ethical conduct and compliance to employees' bonus incentives and that serves as a continuous reminder of the importance that we place on ethical behaviour. The metric includes data on the number of times Enbridge vice presidents and directors speak about ethics and compliance to groups of five or more employees or provisioned contract workers. It also measures the annual volume of medium- and high-impact acts of non-compliance, ethics violations and regulatory actions.

Anti-Corruption & Compliance/Ethics Affiliations: Our Compliance Officers and other employees participate in a number of organizations that provide training and promote the advancement of ethical conduct in organizations throughout North America. Some of the organizations to which we belong include: the Society of Corporate Compliance & Ethics (SCCE); the Open Compliance & Ethics Group (OCEG); the Compliance & Ethics Leadership Council of the Corporate Executive Board; the Association of Certified Fraud Examiners (ACFE); and the Corporate Ethics Management Council (Conference Board of Canada).

Positive Work Environment

We are committed to developing and maintaining a diverse and inclusive work environment, and promoting a healthy and positive work environment.

Our human resources policies affirm our strong commitment to treating all employees with dignity and respect. We also subscribe to the principles of a fair and equitable work environment.

Our work environment promotes a diversity of roles and enriched job experience through project work, secondment opportunities, cross-business unit mobility and participation on cross-functional teams. We also support employees who are interested in actively contributing to the communities in which they live and work, through a variety of volunteer opportunities and through our annual employee-led United Way campaign.

We annually recognize employees who significantly contribute to their communities on their own time and, under our Volunteers in Partnership program, we donate to their respective charities.

Our energy4everyone (e4e) initiative offers another opportunity for employees to donate their time to participate in project delivery in locations such as Costa Rica, Nicaragua, Peru, Ghana and Tanzania (please see map below for more details). The e4e initiative seeks to implement practical and sustainable solutions to improve access to energy for communities in need. For more information, please see the Community Investment section of our 2013 CSR Report.



The value of mentoring and being mentored contributes to a positive work environment. Our mentorship programs, both internal and external, offer an additional opportunity for us to support employees in their roles and enhance their workplace experience. Our internal mentoring program now operates across the enterprise.

We regularly recognize our employees' achievements through a range of formal activities and programs, including service awards, monetary gifts and recognition through internal communications channels and creating opportunities for challenging assignments.

Diversity, Inclusion and Equal Opportunity

We support employment equity legislation requiring that fair and equitable employment opportunities be available to all people. We are also committed to the principles and practices of an inclusive workplace, to creating a workforce that, at all levels, is representative of the diverse population we serve, and to providing a working environment that encourages all people to participate on an equitable basis in employment, training and career advancement opportunities consistent with their abilities, qualifications and aspirations.

For More Information

Please see the following data sheets on www.csr.enbridge.com: [Governance, Commitments and Engagement](#); [Client Collaboration](#); [Human Rights](#); [Labour Practices and Decent Work](#); [Human Health and Safety](#); [Stakeholder Engagement](#); [Aboriginal and Native American Rights and Engagement](#); [Government Relations](#); [Community Investment](#); [Society](#); [Product Responsibility/Customer Protection](#); [Supply Chain and Procurement Practices](#); and [Economic Benefits/Contributions to Local Economy](#).