



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

### Human Rights Performance Data Sheet

This performance data sheet relates to the following Global Reporting Initiative (GRI G3.1) Social Performance Indicators:

- HR1 – Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening
- HR2 – Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken
- HR3 – Total hours of employee training or policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained
- HR4 – Total number of incidents of discrimination and corrective actions taken
- HR5 – Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk and actions taken to support these rights
- HR6 – Operations and significant suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour
- HR7 – Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of all forms of forced or compulsory labour
- HR 9 – Total number of incidents of violations involving rights of indigenous people and actions taken.
- HR10 – Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments
- HR11 – Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms

#### Context

Enbridge strictly adheres to Canadian and U.S. human rights laws, and we consistently and rigorously strive to uphold the highest human rights standards in all of our work.

Our value of Integrity is embodied in our [Statement on Business Conduct](#), which requires employees to make decisions about, and conduct Enbridge's business in, a responsible, honest and ethical manner. Enbridge's [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.

Regarding human rights, our CSR Policy, which has been in place since 2004, specifically states:

*Enbridge recognizes that governments have the primary responsibility to promote and protect human rights. Enbridge will work with governments and agencies to support and respect human rights within our sphere of influence.*

*Enbridge will not tolerate human rights abuses, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.*

*Enbridge will always strive to build trust, deliver mutual advantage and demonstrate respect for human dignity and rights in all relationships it enters into, including respect for cultures, customs and values of individuals and groups.*

Enbridge's CSR Committee reviews, approves or recommends to the Board the risk guidelines, policies, procedures and practices relating to CSR matters, including human rights.

In 2002, we adopted the Voluntary Principles on Security and Human Rights, which the U.S. Bureau of Democracy, Human Rights and Labor established, and which address responsible corporate action in conflict zones. We have incorporated these principles into our Statement on Business Conduct.

In addition, in 2003, we signed on to the United Nations Global Compact (UNGC) and committed to following its principles. The UNGC is an initiative that brings companies together with UN agencies, labour and civil society to support principles in the areas of human rights, labour and the environment. We have committed to support and advance the UNGC's principles and to make them part of our strategy, culture and daily operations.

Our commitment to human rights applies to all aspects of our business—for example, our Major Projects business unit (MP) requires its major suppliers to adhere to Enbridge's Statement on Business Conduct and the Voluntary Principles on Security and Human Rights—and is particularly relevant to our extensive relations with Aboriginal and Native American communities.

Enbridge respects the rights and culture of Indigenous peoples and has adopted an Aboriginal and Native American Policy that outlines key principles for Aboriginal relations and promotes the understanding of both Aboriginal and Native American peoples and issues that are important to them.

## 2013 Key Performance Areas

### **#1. Respect Aboriginal and Native American rights and values through consultation and engagement with communities that are close to, or in some significant way affected by, our projects and operations**

To protect human rights and comply with Canadian and U.S. regulatory requirements, we assess the potential social, economic and environmental impacts of all of our projects through socio-economic and environmental studies, during which we consider:

- The biophysical elements of the terrestrial and marine environment, including key receptors that could potentially be affected
- The project's economic impacts, including its effects on the national and regional economy
- Aboriginal and Native American rights and interests, including the current use of lands and resources for traditional purposes by Aboriginal and Native American persons
- The safety of project workers, and the safety of the communities in which the project would operate
- Potential human health impacts, including changes in the natural environment that could affect the physical health of people

In evaluating these various areas, we also view them from the perspective of our CSR Policy and our Aboriginal and Native American Policy, under which:

- We recognize that governments have the primary responsibility to promote and protect human rights, and that we will work with governments and agencies to support and respect human rights within our sphere of influence
- We respect Aboriginal and Native American rights, land, heritage sites, environmental protocols and traditional knowledge, and are committed to a consistent and thorough approach to consultation, engagement and shared benefits
- We will not tolerate human rights abuses, and will not engage or be complicit in any activity that solicits or encourages human rights abuse
- We will always strive to build trust, deliver mutual advantage and demonstrate respect for human dignity and rights in all relationships we enter into, including respect for cultures, customs and values of individuals and groups

In addition, we strive to improve our performance in all of these areas by upholding our commitments as a signatory to the [United Nations Global Compact](#) and a supporter of the [Voluntary Principles on Security and Human Rights](#).

### 2013 Key Compliance Metrics

#### **Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms:**

- One employment-related complaint was made against Enbridge Gas Distribution (EGD) in 2012. The complaint was resolved in June 2013.
- Two employment-related complaints were made against EGD in 2013, one of which has been resolved, while the other is still under review with the Ontario Human Rights Tribunal.
- Two employment-related complaints were made to the Canadian Human Rights Commission against our Liquids Pipelines business unit (LP) in 2013. Both of these complaints are still under review and have not yet been resolved.
- One employment-related complaint was made to the Canadian Human Rights Commission against MP in 2013. It is under review and has not yet been resolved.

### Management Approach and Background

#### *Aboriginal and Native American Rights and Engagement*

More than 60 First Nations communities are located along our rights-of-way in Canada alone; and, in both Canada and the U.S., energy infrastructure development requires the involvement of Aboriginal and Native American persons who live and work in areas where development is located.

Additionally, in Canada, Aboriginal persons have a constitutionally protected right to be consulted if any government decision has the potential to impact treaty or other Aboriginal rights. The Crown (the federal and provincial governments) therefore recognize Aboriginal groups as being separate and distinct from stakeholders, and have a legal duty to consult with them. Project proponents, such as Enbridge, consult with Aboriginal groups as part of the regulatory process. This consultation includes consideration for their distinct nature and interests. Aboriginal groups can challenge or appeal decisions made by regulatory authorities if they are not satisfied with the decision from a rights and title perspective.

In the U.S., as required under [Section 106 of the National Historic Preservation Act](#), the federal government must consult with recognized Native American tribes and other designated agencies on projects that have the potential to cause adverse effects on historic properties. Under federal law, the U.S. Bureau of Indian Affairs must grant a right-of-way before a company can proceed with construction on any Indian Reservation; lands held in trust for a tribe, band or individual Indian; or lands held by individual Indians or Indian tribes or bands that are subject to restraints against alienation.

Given our commitment to human rights, as well as the regulatory framework within which we operate, our intention is to engage with Aboriginal and Native American communities regularly, consistently and respectfully over the life of our projects. This commitment is a shared responsibility involving Enbridge and our subsidiaries, employees and contractors and is more fully explained in our [Aboriginal and Native American Policy](#).

In acknowledgement of our efforts, in 2013, the [Canadian Council for Aboriginal Business](#) (CCAB) awarded Enbridge its [Progressive Aboriginal Relations](#) (PAR) Silver-level certification, which recognizes excellence in Aboriginal relations in the areas of employment, business development, community investment and community engagement.

While our work has resulted in many examples of successful consultation, engagement and collaboration with Aboriginal and Native American communities, we do face a number of significant challenges. Some communities, for example, have opposed some of our projects based on a number of issues. Please see the Discussion of Significant Challenges and Responses section of our [2013 CSR Report](#) for more information.

Despite the challenges, we continue to look for ways to collaborate and find common ground with these important communities.

### ***Employee Training***

Enbridge recognizes and ensures compliance with all human rights laws and regulations.

As a condition of employment, all new employees are required to read and provide written acknowledgement of their agreement to follow Enbridge's [Statement on Business Conduct](#) (Statement), the human rights elements of which are outlined in the Context section above. Thereafter, all employees must certify their compliance with the Statement each year. The annual certification process for each employee includes the completion of mandatory Statement refresher training, which is coordinated and rolled out each January on an enterprise-wide basis.

Policy and practice are reinforced throughout Enbridge via ongoing mandatory training.

Each business unit has different training packages that address such subjects as maintaining a respectful workplace, anti-harassment and violence in the workplace. All new hires take such training either immediately upon being hired or within three months of being hired. Employees are required to undertake refresher courses every two to three years. If requested, training can also be provided to groups or departments between refresher training cycles. Enbridge continually revisits the content and delivery methodology of these courses to ensure that the information is up-to-date and accessible.

### ***Freedom of Association and Collective Bargaining***

Enbridge believes that healthy and cooperative labour relations—built on trust, respect and integrity—contribute to our business goals and objectives. We continue to maintain and foster a cooperative approach to the union/management relationship through joint committees with various unions and industrial councils. These committees meet regularly to resolve outstanding matters, as well as to advise on and discuss issues of mutual concern.

Enbridge is not involved in any operations in which the right to exercise freedom of association and collective bargaining may be at significant risk.

All of Enbridge's collective agreements and Joint Industrial Council agreements contain a formal grievance mechanism.

### ***Labour Laws***

Enbridge follows the labour laws of the countries in which we operate. Further, Enbridge's activities are governed by our [Statement on Business Conduct](#) and by the [Voluntary Principles on Security and Human Rights](#).

### ***Assessment***

In 2011, the Canadian Human Rights Commission conducted an “Employment Equity Audit” on two Enbridge subsidiaries. As a result of the audit, Enbridge established a Diversity and Employment Equity strategy and a Diversity Steering Committee representing employees across Enbridge’s Canadian Liquids Pipelines (LP) business unit.

LP has created three dedicated positions led by the Manager, Diversity, and is implementing a three-year Employment Equity, Diversity and Inclusion Plan for all LP operations in Canada. We have also undertaken a number of activities and initiatives that promote diversity and inclusion across LP.

### **For More Information**

Please see the following performance data sheets on [www.csr.enbridge.com](http://www.csr.enbridge.com): [Ethics/Fair Operations](#); [Governance, Commitments and Engagement](#); [Compliance](#); [Labour Practices and Decent Work](#); [Human Health and Safety](#); and [Aboriginal and Native American Rights and Engagement](#).