

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

## **Society Performance Data Sheet**

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

- SO2 Percentage and total number of business units analyzed for risks related to corruption
- SO3 Percentage of employees trained in organization's anti-corruption policies and procedures

#### **Context**

We are committed to stopping corruption in all forms, including extortion and bribery. Our commitment in this regard is derived from one of our core values: Integrity.

Our Integrity value is embodied in our <u>Statement on Business Conduct</u>, which requires employees to make decisions about Enbridge's business in a responsible, honest and ethical manner. Our <u>Statement on Business Conduct</u> and <u>Whistle Blower Procedures</u> 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.

## **Management Approach and Background**

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 <u>Statement on Business Conduct</u>, the <u>Whistle Blower Procedures</u> and the 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 <a href="Ethics & Conduct Hotline">Ethics & Conduct Hotline</a> (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.

### 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 <u>Statement on Business Conduct</u>. 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

#### **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).

### **2013 Key Compliance Metrics**

## **Ethics and Conduct Hotline Reports**

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.

# Actions taken in response to incidents of corruption

In 2013, we took action in response to several confirmed cases of material breaches of our <u>Statement on Business</u> <u>Conduct</u>. Actions taken included terminations of employment, suspensions and reassignments.

## **For More Information**

Please see the Governance, Commitments and Engagements performance data sheet on www.csr.enbridge.com.