



# Business ethics

GRI: 102-16; 102-17; 102-33; 102-34; 307-1; 419-1

Our values of Safety, Integrity and Respect and our Statement on Business Conduct underpin our commitment to do business ethically and transparently and in service of our communities, the environment and each other.

## Ethics and compliance

Everyone who works for us understands that they are accountable for upholding high standards of conduct and that our transparency around our performance is essential to building trust with our stakeholders. Our commitment to ethics and compliance starts with our [Statement on Business Conduct](#) (“Statement”), which sets clear expectations for how we work at Enbridge. It applies to our employees, directors, officers, subsidiaries and controlled entities, as well as contingent workers, consultants and contractors in all countries where Enbridge conducts business.

We have a robust governance framework for Ethics and Compliance, which consists of shared responsibility among the Audit, Finance and Risk Committee of our Board, our Chief Compliance Officer and our ELT.

To support the Statement, Enbridge’s Ethics and Compliance Program (“Program”) provides a comprehensive system of ethics and compliance stewardship and accountability in all day-to-day operations. The Program establishes the accountabilities and responsibilities for our personnel and outlines processes to manage legal and regulatory risks with the goal of minimizing incidences of non-compliance. As a condition of employment, we require our employees and contingent workers to annually certify compliance with the Statement and complete the mandatory online Statement training.

We consciously strive to strengthen the Program and undertook initiatives in 2019 to enhance both our Ethics Helpline and our Anti-Bribery and Anti-Corruption program. In addition, we created and distributed an Ethics and Compliance Leadership Handbook (“Handbook”) to people leaders across the organization.

To further raise awareness and prevent non-compliance, hundreds of employees received comprehensive in-person training and awareness sessions in 2019 on our Program and supporting policies, including Anti-Bribery and Anti-Corruption and Privacy.

## Anti-Bribery and Anti-Corruption

Enbridge is committed to complying with all applicable legal requirements related to financial crimes. Our Anti-Bribery and Anti-Corruption program includes policies, procedures and training aimed at preventing violations of anti-bribery and anti-corruption legislation, as well as money laundering, facilitation of tax evasion and terrorist financing. As part of this program, Enbridge has in place a process for conducting due diligence in respect of third parties with which Enbridge does business, to the extent such third parties may pose a potential risk under Enbridge’s Anti-Bribery and Anti-Corruption program.

## Fostering an open culture

We strongly believe in maintaining a culture where our employees and contingent workers feel empowered and supported in conducting business the right way. Our people leaders have a special role in leading by example through acting with integrity and respect, as well as nurturing an open culture where everyone feels comfortable speaking up.

We encourage employees to turn to their people leaders first to share questions or concerns about potential misconduct or violations of law or policy. Other options include reaching out to the Ethics and Compliance Department, Chief Compliance Officer, Human Resources Department, Law Department, Internal Audit Department and via the Ethics Helpline. The Handbook, coupled with the Statement, provide our people leaders and other points of

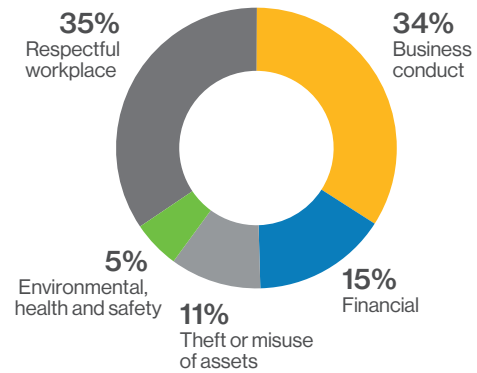
contact the resources they need to provide guidance and respond appropriately to ethics and compliance concerns.

In 2019, we introduced a new third-party Ethics Helpline (previously referred to as Ethics and Conduct Hotline), operated by Convercent. The Ethics Helpline is a modern and confidential platform that facilitates the anonymous reporting of potentially illegal, unethical or improper conduct at Enbridge and provides a mechanism for stakeholders to ask questions regarding the application of the Company's many governing policies. The functionality of the Helpline has been enhanced to provide the most flexible and innovative reporting methods in the industry, including 24/7 Helpline access via telephone, internet submission and mobile texting.

In 2019, a total of 118 inquiries were received through these channels, down from 122 in 2018. Anonymous reporting represented 54% of all reports, compared to 61% in 2018.

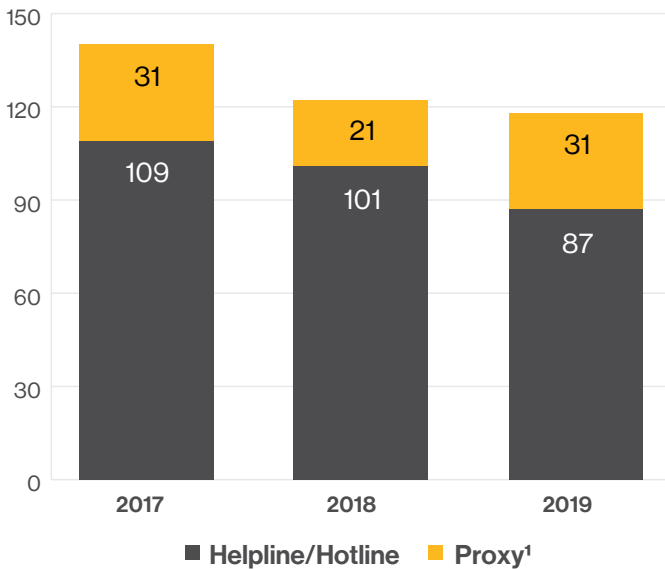
### Ethics reports by category

(% of reports)



### Ethics reports by source

(number of reports)



<sup>1</sup> Proxy refers to inquiries received in-person, letter, direct email or direct phone call to a member of the Ethics and Compliance Department.

### Fines, penalties and violations

Our intention is to work according to all external regulations and laws to prevent fines, penalties and violations that are monetary or non-monetary in nature.

We report all fines, penalties and violations (monetary and non-monetary) in excess of C\$10,000 and US\$10,000 (depending on the country in which they occurred). In 2019, a total of US\$489,400 was paid and resolved with the appropriate regulatory agency. Details can be found in the [Appendix](#) of this report.