

Our Statement on Business Conduct

Integrity in everything we do



Table of contents

Introduction

Table of contents	1
Message from Greg Ebel	2



Doing the right thing

We have strong values	4
We are committed to doing the right thing	5



Supporting our team members

We lead by example.....	10
We are better together	12
We respect one another and celebrate our differences.....	14
We act in Enbridge's best interest.....	15
We are cautious with gifts and entertainment	18



Following the rules

We create a safe and healthy workplace.....	22
We come to work fit for duty	25
We compete fairly.....	27
We follow the rules of regulated businesses.....	29
We respect the democratic process.....	31
We only speak to the media about Enbridge when we are authorized	33



Avoiding financial crimes

We have zero tolerance for bribery and corruption..	35
We uphold human rights	37
We require third parties to uphold our values	38
We take personal responsibility to prevent fraud	40
We ensure proper accounting, financial reporting and public disclosure	42
We do not trade on inside information	43
We comply with international trade rules	45



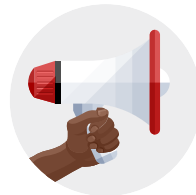
Protecting our assets and data

We protect our assets.....	47
We are trusted with handling personal information	50
We use social media respectfully and responsibly.....	53



Speaking up

We speak up when we have concerns.....	55
We investigate fairly	58



Resources

Glossary.....	63
Governing policies.....	65



Message from Greg Ebel

Dear colleagues,

What we do every day matters to millions of people. Delivering the energy people need and want supports the quality of life and economy that we all enjoy, and it comes with a lot of responsibility.

The Enbridge *Statement on Business Conduct* reflects both the vital role we play in people's lives and the important responsibilities placed upon us. More than just a rule book, it provides practical guidance to help us recognize and address uncertainty and risk.

Our *Statement on Business Conduct* is guided by our values of safety, integrity, respect, inclusion and high performance, and supports us as we work to secure Enbridge's success, now and in the future. Our stakeholders—team members, customers, investors, suppliers, Indigenous Nations, Tribes, governments and groups, landowners and the public—count on us to work safely, reliably and respectfully. Retaining and building on their trust in us and what we do is essential to our business.

Making the right choices and always doing the right thing fosters a culture we can be proud of and one in which we can thrive. Adhering to our *Statement on Business Conduct* enables us to build an even stronger, more resilient, and performance-driven company.

Sincerely,



Greg Ebel
President & Chief Executive Officer



Doing the right thing

In this section:

- We have strong values
 - We are committed to doing the right thing
-



We have strong values

Our values of safety, integrity, respect, inclusion and high performance are the driving force behind our company and reflect what is truly important to us. These values serve as our north star, a constant beacon by which we make our decisions, as a company and as individual employees, every day.

Safety

- We relentlessly ensure the safety of our communities, customers, contractors, partners and employees
- We proactively identify and prevent safety issues
- We act immediately when a safety issue is identified
- We continually strive to improve safety performance

Integrity

- We do the right thing
- We act courageously and speak up
- We maintain truth and transparency
- We take accountability for our actions

Respect

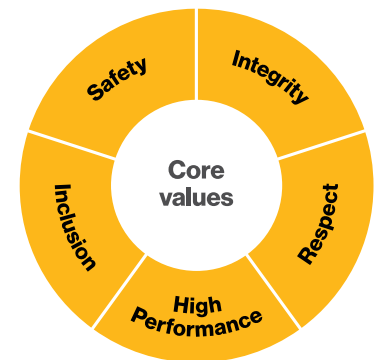
- We value everyone's contributions
- We listen to understand first
- We are considerate and support the well-being of all
- We treat everyone with unfailing dignity and defend against intolerant behavior

Inclusion

- We want and encourage diverse perspectives for the best decisions
- We see and celebrate our differences as a strength
- We foster a sense of belonging and team
- We champion fairness and equity

High Performance

- We achieve consistently high levels of business success within a rapidly changing world. We continuously optimize assets in an unrelenting drive for lasting value and superior results
- We align to deliver results on things that matter
- We embrace change, take measured risks and adapt to stay ahead
- We trust, empower and provide autonomy
- We choose simplicity over complexity



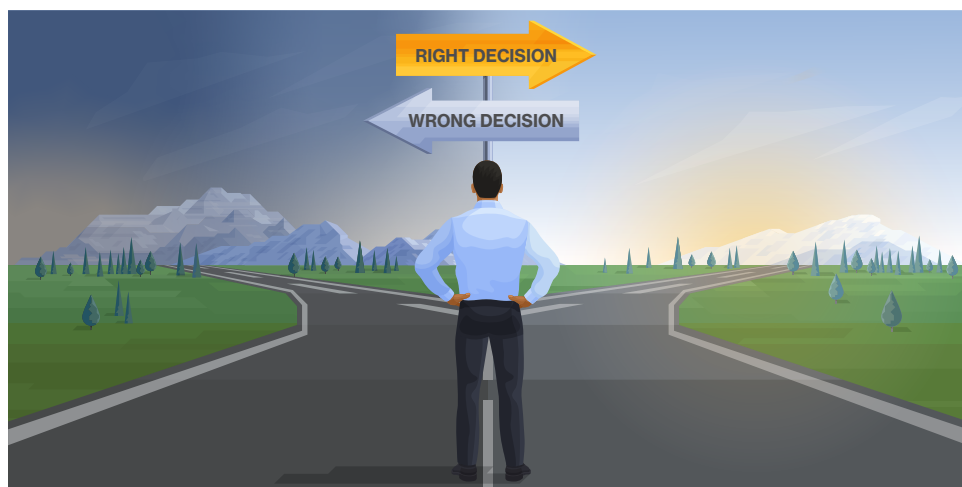
We live our values in support of



We are committed to doing the right thing

The Statement on Business Conduct outlines the principles governing the behavior and standards of conduct we expect of ourselves and each other. It is not only a matter of doing what the law and Enbridge policies require us to do; it is about doing the right thing.

When interpreting the Statement on Business Conduct, we must observe both the spirit and the literal meaning of its language.



How we work

We do the right thing every day by:

- Understanding and abiding by the principles set out in the Statement on Business Conduct, all supporting policies and the laws, rules and regulations applicable in the countries in which we do business
- Maintaining truth and fairness in all of our business dealings, taking accountability for our actions and following through on our commitments
- Not taking unfair advantage of others through manipulation, concealment, misuse of information, falsification or any other unfair-dealing practice
- Being a good neighbor and contributing to the strength and resilience of the communities in which we live and work
- Living our commitment to strong environmental, social and governance practices and performance
- Acting courageously and speaking up using the resources listed on page 56 when we become aware of actual or suspected wrongdoing

More information

- Enbridge Inc. Sustainability Policy
- Ethics & Compliance Program Charter
- Whistle Blower Policy

We are committed to doing the right thing

Who does the Statement on Business Conduct apply to?

The Statement on Business Conduct applies to Enbridge Inc., its subsidiaries, and controlled entities (collectively “Enbridge”) as well as their directors, officers, employees and contingent workers in all countries where Enbridge conducts business.

Vendors, consultants, contractors or other third parties are required to follow standards of conduct consistent with our Statement on Business Conduct and the Supplier Code of Conduct.



We are committed to doing the right thing

How does Enbridge uphold the Statement on Business Conduct?

Training and Certification

At the start of employment with Enbridge and annually thereafter, all employees, contingent workers and contractors active in Workday are required to complete online training and certify compliance.

Employees, contingent workers and contractors are also required to disclose any actual or potential conflicts of interest.

Violations

Violations of the Statement on Business Conduct and all other Enbridge policies or applicable laws, rules and regulations may result in disciplinary action, up to and including termination of employment or contract.

Everyone working for Enbridge has an affirmative duty to report actual or suspected violations of the Statement on Business Conduct or Enbridge policies. Failure to report violations may be grounds for disciplinary action.

Disciplinary action can also result for anyone who interferes or refuses to cooperate with an investigation into alleged or potential violations of the Statement on Business Conduct.

Waivers

Any waiver from any part of the Statement on Business Conduct requires the approval of the Chief Executive Officer.

For executive officers, senior financial officers and members of the board, a waiver requires the express approval of Enbridge Inc.'s board and may require public disclosure.

We are committed to doing the right thing

Ethical decision checklist

We are all responsible for making ethical decisions. But sometimes doing the right thing is not clear. The Statement on Business Conduct does not explicitly cover all conceivable situations or circumstances we could face, and when it's not clear, we can ask ourselves these questions:

- | YES | NO | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Is it safe? |
| <input type="checkbox"/> | <input type="checkbox"/> | Is it legal? |
| <input type="checkbox"/> | <input type="checkbox"/> | Is it in line with our values? |
| <input type="checkbox"/> | <input type="checkbox"/> | Does it comply with the Statement on Business Conduct and other policies? |
| <input type="checkbox"/> | <input type="checkbox"/> | Would I feel comfortable if it appeared in the news? |

If you answered “No” or “I don’t know” to any of these questions, stop. The decision may have serious consequences.

Supporting our team members

In this section:

- We lead by example
 - We are better together
 - We respect one another and celebrate our differences
 - We act in Enbridge's best interest
 - We are cautious with gifts and entertainment
-



We lead by example

At Enbridge, people leaders have a special role—to lead by example, be accountable for their own actions and behaviors, and ensure that their direct reports are aware of their obligations as prescribed in the Statement on Business Conduct.



How we work

We commit to being ethical leaders by:

- Modeling our values
- Setting the tone for an ethical workplace
- Promoting open communication and trust in the workplace
- Coaching and guiding team members on how to conduct business consistent with the Statement on Business Conduct
- Acting as a resource for team members when they need to raise concerns or seek advice
- Taking action to address issues
- Standing against retaliation

More information

- Ethics & Compliance Leadership Handbook
- WE Handbook

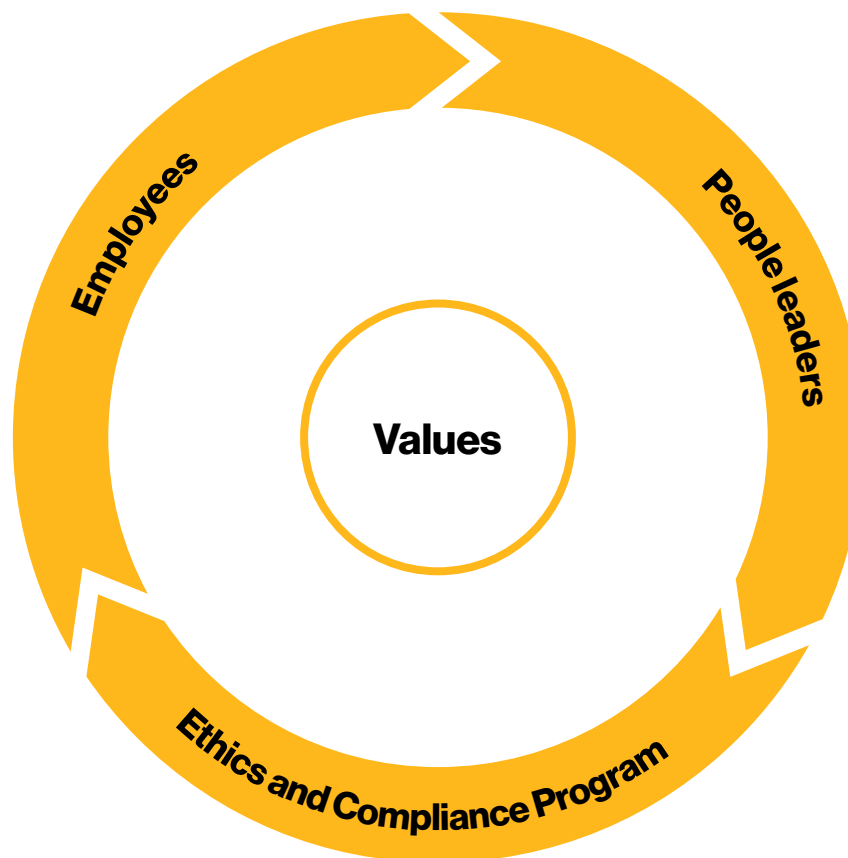
We lead by example

Shared responsibility

When team members see that working with integrity matters, they will follow suit.

Employees

- Know and understand the rules
- Live our values
- Know and abide by the standards of conduct set out in this Statement on Business Conduct and supporting policies



People leaders

- Uphold Enbridge's ethics and compliance culture and promote both the letter and the spirit of the Statement on Business Conduct
- Stand against retaliation
- Address issues and act as a resource for team members

Ethics and Compliance Program

- Promote our values, ethical behavior and speak up culture
- Investigate policy, legal violations and ethical misconduct
- Manage risk through the establishment of programs that help to ensure compliance

We are better together

Everyone working for Enbridge is entitled to a workplace free of harassment, sexual harassment, discrimination, bullying, workplace violence or maltreatment.

We ensure all our people are treated fairly and equitably from the moment we hire them through the milestones of their careers. When we see a disparity, we fix it.



How we work

We respect all individuals by:

- Never behaving in a way that could be interpreted by others as violent, harassing, discriminatory, offensive, disruptive, intimidating or insulting
- Standing together for anti-racism, acceptance and respect
- Recognizing there are different types of privilege and focusing on eliminating systems that may marginalize or exclude
- Making fair and equitable employment-related decisions, including decisions about how to recognize, reward or discipline employees, based on objective criteria related to job performance and qualifications
- Promoting open communication and trust (including by protecting against real or implied threats of retaliation) so everyone at Enbridge feels secure about voicing concerns
- Reporting any harassing behavior, workplace violence (including threats of violence), instances of improper treatment or **discrimination** to our People Leaders, the Ethics & Compliance department, Human Resources, Enterprise Security or the Ethics Helpline

More information

- Respectful Workplace policies
- Equal Employment Opportunity Policy

We are better together

We hold ourselves and each other accountable for disrespectful and inappropriate behavior.

**Spot
it**

**Stop
it**

**Speak
up**

Q&A

Q

What if I receive an email that includes offensive jokes or language?

A

Jokes that would be reasonably viewed as offensive have no place at Enbridge, and should not be sent through company email, regardless of the intended recipients. Recipients may tell the co-worker, who sent the email, that you found the email offensive. You may also report this to your people leader, HR, the Ethics & Compliance department or the Ethics Helpline.

We respect one another and celebrate our differences

Enbridge does not tolerate discrimination based on prohibited grounds or harassment of any kind

One of the ways we support each other is through our Employee Resource Groups.



CARES

(Caregivers, Allies, Resources, Education and Support)



Connect

(Next Generation Employees)



DAN

(Diverse Abilities Network)



EDGE

(Ethnically Diverse Group of Employees)



FEMINEN

(Females in Engineering)



IERG

(Indigenous Employee Resource Group)



Prism Energy



Veterans



Women@Enbridge

We act in Enbridge's best interest

We are objective in our decision making, protecting the integrity of our business and reputation in the eyes of our investors, shareholders, customers and the public.

Business decisions must be based on sound and objective judgment, without any possibility that our decisions or objectivity could be influenced by personal considerations.



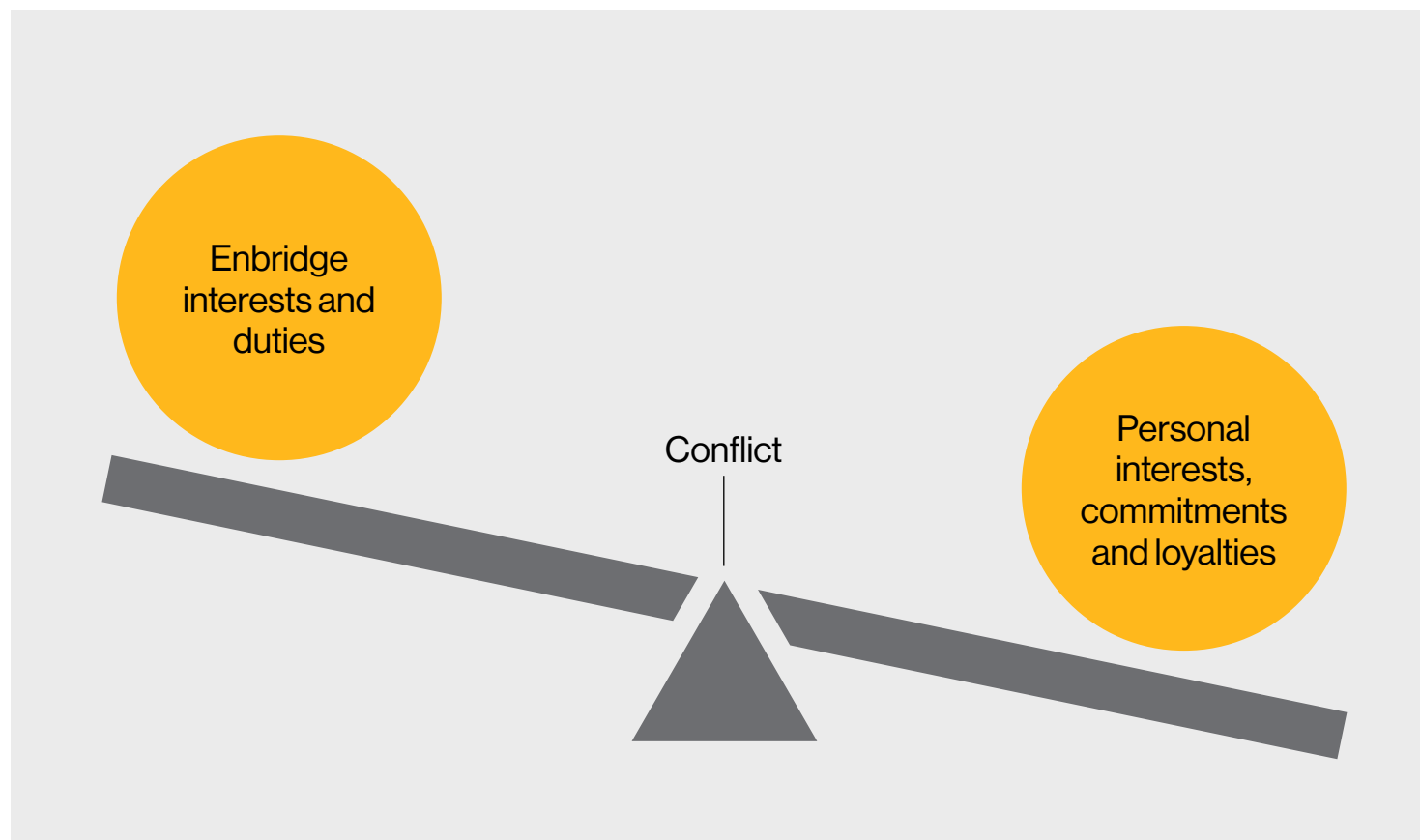
How we work

We act in Enbridge's best interests by:

- Always being aware of and disclosing situations that could create an actual, perceived or potential **conflict of interest**
- Never allowing anything we do, whether on the job or in our free time, to conflict with our responsibilities to Enbridge
- Never allowing a personal relationship or activity to impair our ability to use independent, objective judgment when acting on Enbridge's behalf
- Using our best efforts to arrange our affairs in a way that ensures our personal and family relationships, financial interests and outside activities do not conflict, or appear to conflict, with our responsibilities to Enbridge
- Excusing ourselves from any political matters involving Enbridge when serving in public office

We act in Enbridge's best interest

What is a conflict of interest?



Still unsure?

As a first step, ask yourself the questions below to determine whether you might be placing yourself in a conflict of interest.

- 1 Will I feel obligated to someone else?
- 2 Is there a chance—however small—that my independent judgment will be compromised?
- 3 Would my decision or action give the appearance of divided loyalty?

If you answered “yes” to any of these questions, it is likely your decision or action will result in a real or perceived conflict of interest.

If you find yourself in a position where your objectivity could be questioned due to a personal relationship, interest or activity, you must **immediately disclose** the situation to your people leader and the Ethics & Compliance department and **seek guidance** about how to address it. Most conflicts of interest can be avoided or addressed if they are disclosed in a timely manner and properly managed.

We act in Enbridge's best interest

Common conflicts of interest



Investments and financial opportunities

Disclose investments or holdings of 5% or more (direct or indirect) in an entity doing business with Enbridge.



Gifts and entertainment

Never offer or accept gifts or entertainment that might improperly influence business decisions.



Taking opportunities from Enbridge

Never divert a business or investment opportunity or use non-public information that belongs to Enbridge or that is learned through our role for personal gain.



Political contributions and government lobbying

Obtain pre-approval before engaging in personal political campaigning on company time, or when making plans to campaign for, or serve in, public office, and when serving, we must recuse ourselves from any political matters involving Enbridge.



Relatives and friends

Use best efforts to ensure our personal and family relationships do not interfere with our responsibilities to Enbridge or influence our business decisions.



Outside employment and directorships

Obtain appropriate approval (of our Chief Compliance Officer, the CEO, or the Board of Directors in case of the CEO) before accepting a position as a director or any similar role with a publicly traded entity or with a political, government or regulatory agency.

Never directly or indirectly working for a competitor, customer or supplier of ours while we are employed by Enbridge.

This policy does not contain an exhaustive list of all potential conflict of interest situations.

We are cautious with gifts and entertainment

Strong relationships with our customers and business partners are essential and contribute to Enbridge's success. Sometimes we provide or receive business courtesies, such as reasonable entertainment and modest gifts.

We must never allow such courtesies to affect our ability to make objective business decisions or to create even the appearance that our or the other party's objectivity has been compromised.



How we work

We exercise caution by:

- Ensuring that any gift, promotional item or entertainment offered or received is of minimal value, legal, customary, in good taste and clearly related to Enbridge's business
- Never requesting or soliciting gifts or entertainment of any kind from a current or potential contractor, supplier, vendor or other business partner, unless the request is directly connected to a charitable or philanthropic initiative that has been approved by senior management
- Never offering, giving or accepting gifts or entertainment during any period when Enbridge is negotiating or renewing a contract or is seeking proposals or bids for products or services offered by a current or potential contractor, supplier or vendor
- Never offering or giving a gift or favor to persons in a position of trust or responsibility (especially government or Public Officials) to influence them to grant favorable treatment to Enbridge or any of its personnel

More information

- Anti-Bribery and Anti-Corruption and other Financial Crimes Policy
- Supplier Code of Conduct

We are cautious with gifts and entertainment



When in doubt, reach out.

Before offering or providing a gift or entertainment to a Public Official, consult with the Ethics & Compliance department to ensure compliance with the Anti-Bribery & Anti-Corruption and other Financial Crimes Policy.

Gifts or entertainment guidance

Never offer or accept gifts or entertainment that:



Are in the form of cash or cash equivalents, such as gift cards, gift certificates or vouchers.



Have significant or excessive value or appear so to others.



Are suggestive of or could create a perception of influence or special treatment.



Are not business-related.



Are conducted in an inappropriate setting.



Violate anti-bribery and anti-corruption laws.

We are cautious with gifts and entertainment

Q&A

Q

A supplier sent me a holiday greeting card with a \$50.00 gift card to a local restaurant. May I accept?

A

No. The Statement of Business Conduct expressly prohibits accepting gifts in the form of cash or cash equivalents. Even though the gift card is of nominal value, you must decline and return the gift card to the supplier.

Q

A vendor has sent me an invitation to attend an educational conference they are hosting. May I accept?

A

Yes, as long as:

Enbridge is not in contractual negotiations or seeking proposals or bids for products or services offered by that vendor.

Your attendance at the conference provides a legitimate business benefit to Enbridge.

You receive written approval from your people leader. Once you have received approval, you may accept meals, nominal commemorative items and participate in modest events associated with this conference, but all travel (flight, transportation, and accommodation) costs must be paid for by Enbridge.

Following the rules

In this section:

- We create a safe and healthy workplace
 - We come to work fit for duty
 - We compete fairly
 - We follow the rules of regulated businesses
 - We respect the democratic process
 - We only speak to the media about Enbridge when we are authorized
-



We create a safe and healthy workplace

Enbridge is committed to ensuring everyone returns home safely at the end of each and every day, and that our assets are operated in a safe and reliable manner.

We base our commitment to safety on our care for our employees, contractors, the communities in which we operate and the environment.



How we work

We promote a safe and healthy workplace by:

- Complying with all applicable occupational health and safety laws, regulations, codes and standards
- Ensuring our actions and decisions are guided and informed by our duty to protect the public, members of our team and the environment
- Basing our actions and decisions on our Safety Principles, Lifesaving Rules and all other Enbridge policies and procedures that apply
- Supporting mental health in our workplace by removing barriers to assistance and providing programs, policies and resources to promote mental health
- Speaking up when we have a safety question or concern

More information

- Safety and Reliability Policy
- Safety principles: Our Path to Zero
- Lifesaving Rules

We create a safe and healthy workplace

Our Safety Principles

Our Safety Principles support our values and highlight the fundamental beliefs we share on our path to a zero-incident workplace.

Safety. It's a core value that makes us Enbridge. It's our way of life.



- 1 All injuries, incidents and occupational illnesses can be prevented
- 2 All operating exposures can be controlled
- 3 Leaders are accountable for safety performance
- 4 All employees/contractors are responsible for safety
- 5 Assessment and improvement are a must
- 6 We promote off-the-job health and safety for our employees 24/7

We create a safe and healthy workplace

Our Lifesaving Rules

The Lifesaving Rules apply to everyone at Enbridge and compliance is mandatory.



Hazard Management

I will complete a hazard assessment prior to starting work and reassess if conditions change and new hazards are introduced.



Driving Safety

I will only operate a motor vehicle or mobile equipment when free from the adverse effects of alcohol or any substance that causes impairment.



Confined Space Entry

I will confirm the atmosphere has been tested, is monitored and a plan is in place before entering a confined space.



Ground Disturbance

I will verify the location of buried utilities through surface locating and positive identification prior to conducting a mechanical excavation.



Isolation of Energized Systems

I will verify isolation and zero energy before work begins on energized or pressurized systems (Lockout/Tag-Out).



Reporting of Safety Related Incidents

I will immediately report significant safety-related incidents.



Bypassing Safety Controls

I will obtain authorization before overriding or disabling safety-critical equipment or controls.

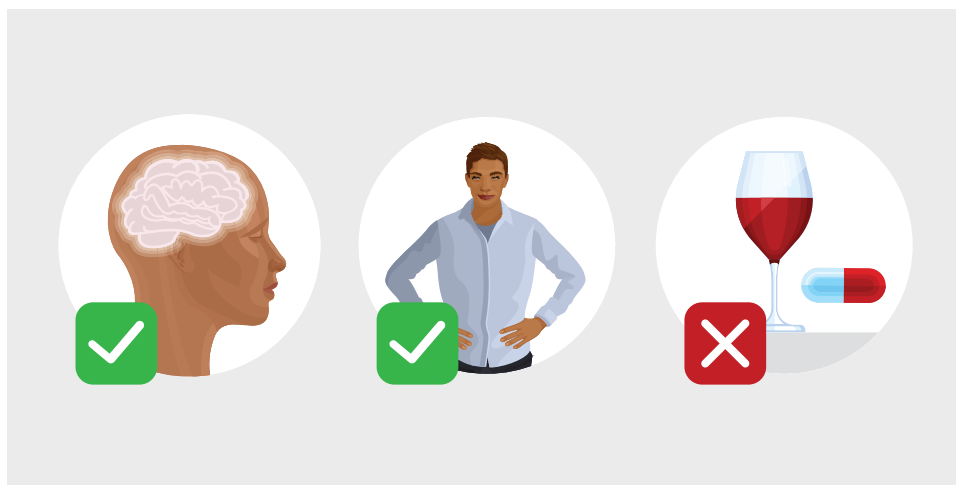
We come to work fit for duty

Enbridge requires a safe workplace free from the adverse effects of alcohol or drugs. Our team members are prohibited from working while under the influence.

How we work

We maintain a safe and positive workplace by:

- Arriving at work fit for duty and free from any adverse effects of alcohol or drugs that are prohibited under the applicable Workplace Alcohol and Drug policies
- Never using, possessing or selling drugs, controlled substances or drug paraphernalia on Enbridge's property or while working
- Taking immediate action if we see a coworker who may be impaired by alcohol or drugs while at work



More information

- Workplace Alcohol and Drug Policy (Canada and US)

We come to work fit for duty

Q&A

Q If I consume alcohol or drugs in my free time, such as over the weekend, and alcohol or drugs are still in my system when I begin to work, will I be sent for testing and held accountable?

A If you are working and management has reasonable cause/suspicion to believe you are impaired by alcohol or drugs, you will be sent for alcohol and drug testing. If the test results are positive, there may be disciplinary action up to and including termination of employment.

We compete fairly

At Enbridge, we believe vigorous and fair competition results in lower prices and expanded choices for the customers we serve and, ultimately, the consumers of the energy we deliver.



How we work

We compete fairly by:

- Acting independently
- Being cautious with our competitors
- Competing aggressively on price, quality and service
- Being transparent in our marketing and advertising
- Collecting competitive intelligence fairly, ethically and legally
- Never restricting capacity or entering into false transactions in order to manipulate or interfere with normal functioning of the market

More information

- [Competing Fairly Policy](#)

We compete fairly

Driving the right behavior on competition



Stop! Illegal

- Agreeing with competitors to fix prices, limit production or capacity, divide territories, markets or customers
- Rigging a bidding process
- Refusing to deal with/boycott a customer or supplier
- Misleading advertising or other deceptive marketing practices
- Sharing information regarding price, markets, customers or market strategies with competitors



Slow down, seek advice

- Entering joint ventures, mergers, joint purchasing or joint-bidding agreements
- Joining industry or trade associations
- Serving as a director of or consultant to another company
- Employee compensation surveys originating from outside Enbridge
- Gun-jumping
- Discriminating among customers
- Creating “non-compete” clauses or agreements



Proceed, it's lawful

- Making independent decisions regarding competitively sensitive issues (such as price and capacity)
- Competing aggressively based on price, quality and service
- Making market decisions based on legitimate supply and demand considerations
- Acting honestly and transparently in all our dealings, including social activities
- Selecting contractors, suppliers, vendors and other business partners on the basis of merit and objective criteria

We follow the rules of regulated businesses

At Enbridge, we operate with integrity and build trust in our relationships by complying with all rules and regulations applicable to our many regulated businesses and communicating with regulators in an open and timely manner.



How we work

We comply with all:

- Applicable laws, rules, regulations, permits, authorizations and tariffs to maintain our license to build and operate
- Commitments made to regulators and other stakeholders in connection with regulatory proceedings and applications
- Health, safety and environmental rules, and all management system requirements that ensure the protection of people, property and the environment
- **Affiliate** codes and standards of conduct and other rules prohibiting sharing of certain information or undue discrimination among our customers
- Required physical, financial and information separation between regulated and unregulated businesses

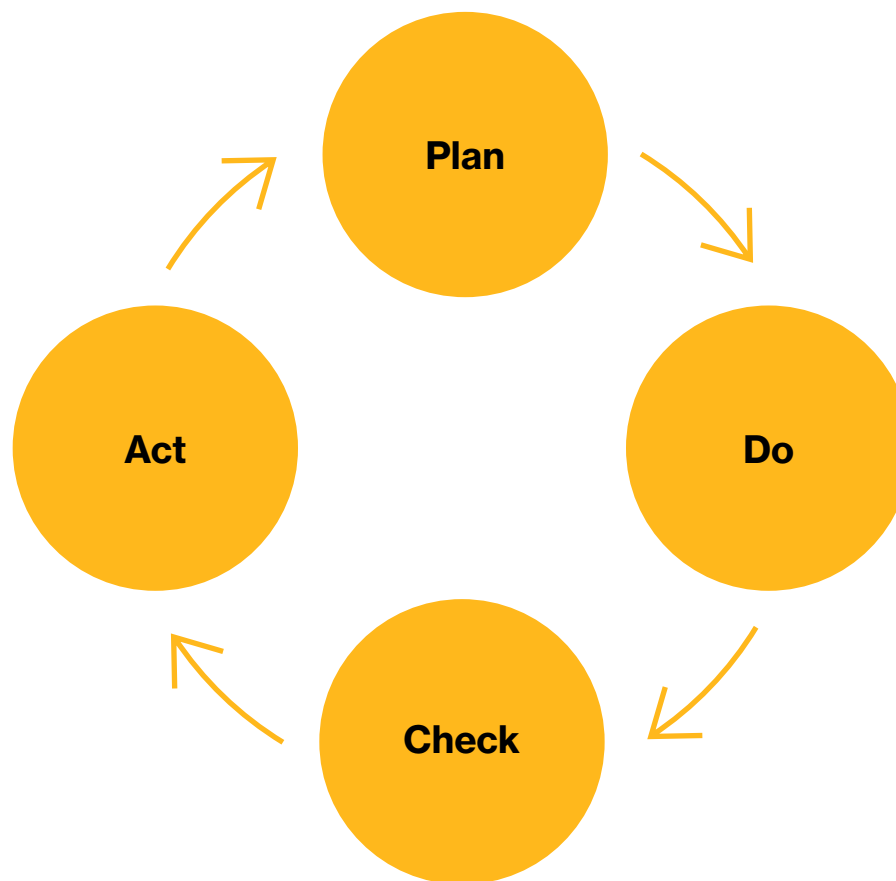
More information

- Affiliate Relationship Code
- Management System Framework

We follow the rules of regulated businesses

Management System Framework

- 1 Leadership and governance
- 2 Risk management
- 3 Requirements management
- 4 Performance management
- 5 Operational controls
- 6 Management of change
- 7 Capability management
- 8 Documents and records
- 9 Assurance
- 10 Stakeholder engagement
- 11 Management review

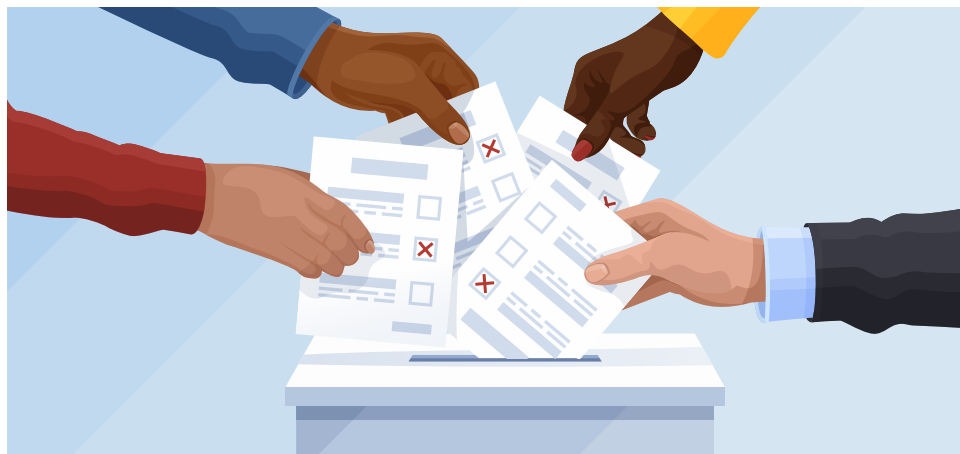


We respect the democratic process

We are transparent on our political activities and share our viewpoint on issues affecting the company with our stakeholders, including employees, customers and the general public.

Employees are entitled to express their position on issues relevant to our business as well as to support their political parties of choice.

We must always follow the rules about registration, disclosure and lobbying to ensure transparency and prevent improper government influence.



How we work

We fulfill these rules by:

- Only having authorized and registered personnel engage in direct **lobbying** or similar political activities on behalf of Enbridge
- Ensuring all political donations comply with political donation and election laws
- Notifying the Ethics & Compliance department when making plans to campaign for or serve in public office
- Making clear that political statements we make are our individual, personal views and not those of Enbridge
- Understanding ethical and legal obligation of political and lobbying activities

More information

- Political Contributions Policy
- Spokesperson Policy



Learn more

Only individuals who are properly selected and registered may lobby government on behalf of Enbridge, and only with the approval of Enbridge's senior leader responsible for External Affairs in Canada and/or the United States.

We respect the democratic process

Q&A

Q

Do I need approval to be politically active and volunteer my time?

A

Enbridge supports individual employee participation in the political process in our communities, including involvement with political parties, candidates or on public policy issues. Make clear that your political statements are your personal views and not those of Enbridge.

You must obtain approval from your people leader before performing political activities in a personal capacity on company time.

We encourage individuals to exercise their right to vote in elections.

We only speak to the media about Enbridge when we are authorized



When in doubt, reach out.

Refer inquiries to the media line:

1-888-992-0997 or media@enbridge.com

Our investment community, customers and the public rely on the information we release through the media and other communication channels.

We are committed to ensuring confidentiality, and only authorized spokespersons should provide information about Enbridge to the media or public.



How we work

We prevent the inadvertent disclosure of non-public, confidential information by:

- Ensuring employees who are not authorized as spokespersons do not respond, under any circumstances, to inquiries from the investment community, the media or others, unless specifically asked to do so by an authorized spokesperson
- Referring all external requests for information about Enbridge to Public Affairs and Communications, Investor Relations or Enbridge's toll-free media line
- Never sharing non-public information about Enbridge unless specifically asked to do so by an authorized spokesperson
- Engaging with Enterprise Communications before delivering external presentations
- Obtaining people leader approval before proceeding with public communications or speaking engagements

More information

- Disclosure Guidelines
- Spokesperson Policy

Avoiding financial crimes

In this section:

- We have zero tolerance for bribery and corruption
- We uphold human rights
- We require third parties to uphold our values
- We take personal responsibility to prevent fraud
- We ensure proper accounting, financial reporting and public disclosure
- We do not trade on inside information
- We comply with international trade rules



We have zero tolerance for bribery and corruption

We never offer or accept bribes to or from anyone, whether directly or indirectly through a third party. This applies both in our dealings with Public Officials and our private and commercial dealings.



How we work

We prevent bribery and corruption by:

- Never making **facilitation payments** or grease payments
- Exercising care when interacting with **Public Officials**, which includes **Indigenous peoples'** representatives
- Ensuring third parties we do business with do not pay or accept bribes on Enbridge's behalf
- Conducting **due diligence** checks on our partners and other parties that act on Enbridge's behalf and monitor their activity on an ongoing basis for corruption-related risks
- Being cautious in our emails and other communications to avoid even creating the perception of bribery or influence
- Recording the nature and purpose of all transactions and expenditures accurately and having adequate controls in place to prevent and detect bribery

More information

- Anti-Bribery and Anti-Corruption and other Financial Crimes Policy



Learn more

All requests for donations by municipalities, Indigenous groups or other similar governmental bodies must be referred to the Community Investment team for independent assessment and approval, and not offered when Enbridge is seeking a permit, approval or similar decision from the governmental body.

We have zero tolerance for bribery and corruption

What makes it a bribe?

A **bribe** is when someone gives or promises another person **anything of value** to obtain a benefit, favorable treatment or business advantage (e.g., contracts, permits, modifying audit results).

Bribes do not always come in the form of cash, bank transfers or even gifts. Anything of value includes:



Shares



Discounts



Travel or
entertainment



Personal favors such
as hiring friends, family
or businesses



Scholarships



Political or charitable
contributions

Q&A

Q

Can I invite employees of a government-owned shipper to a customer appreciation event?

A

Not without consulting with the Ethics & Compliance department to determine if this would be viewed as extravagant and potentially unlawful where we do business.



Learn more

Special rules apply when offering or giving gifts, favors and entertainment to Public Officials and employees of **government or state-owned entities** even if the intent is not to induce them to grant favorable treatment to Enbridge or any of its employees.

Always obtain guidance from the Ethics & Compliance department before offering or giving anything of value to such individuals.

We uphold human rights

All human beings deserve to live freely and to be treated with dignity and respect.

Enbridge does not tolerate human rights abuses of any kind, including human trafficking, forced or child labor in our operations, supply chain or by the third parties we do business with.

We are committed to honoring the rights and traditions of Indigenous peoples and building long-term relationships with Indigenous communities.



How we work

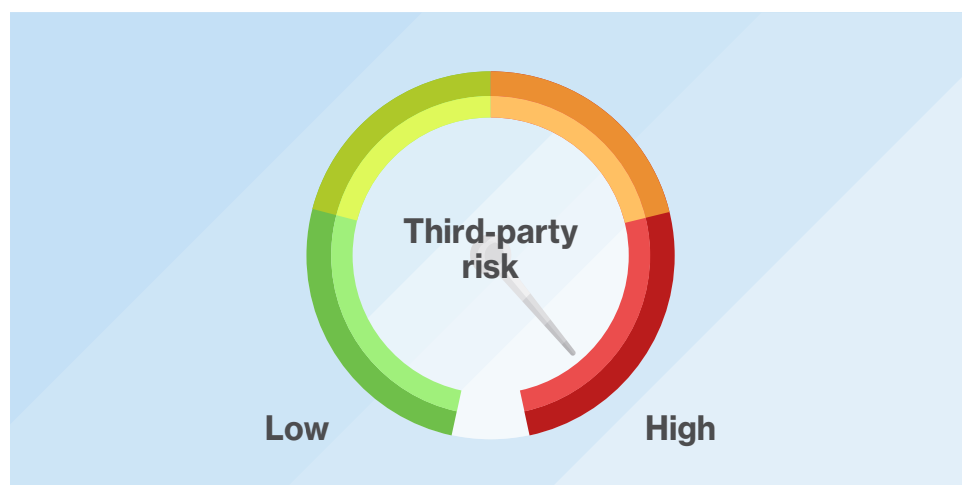
We uphold human rights by:

- Conducting due diligence on and requiring that the third parties we do business with do not engage in, or support others who engage in, human rights abuses
- Engaging with Indigenous communities in a manner that respects their culture, way of life and relationship with the land
- Complying with all applicable wage and hour laws in the jurisdictions where we do business
- Respecting our workers' right to freedom of association, as well as all people's legally protected rights, both within and outside the workplace
- Providing our workforce with safe and humane working conditions

We require third parties to uphold our values

Doing business with external parties introduces third-party risk that could, if not properly managed, result in serious financial and reputational damage to Enbridge.

We must ensure Enbridge does not become a victim of financial crimes and does not become implicated in schemes by others looking to perpetrate, finance, conceal or legitimize crime.



How we work

We manage **third-party** risk by:

- Performing risk-based **due diligence** on new third parties and continually monitoring them to ensure they are not sanctioned, and do not engage in **financial crimes** or human rights violations
- Ensuring third parties are placed under appropriate contractual obligations and/or receive compliance training
- Ensuring that our businesses and systems are not used as conduits to **launder money** or facilitate fraud or other criminal activity
- Being vigilant about any unusual or suspicious activity, especially in relation to the use of our business assets, processes or systems

More information

- Supplier Code of Conduct

We require third parties to uphold our values



When in doubt, reach out.

Always get guidance from the Ethics & Compliance department to develop a plan before entering into a contract with a third party.

Red flags alert us of possible illegal activity—watch out for these risks

- Connections to Public Officials or to countries having a reputation or history for corruption or under international sanctions
- Lacking in facilities or staff to do the job and/or lack of books and records
- Requests for political or charitable contributions
- Unusual payment requests or mechanisms, such as requests for cash transactions or payments for unusually high compensation or credit line
- Requests to deposit money into personal rather than business accounts or accounts in countries other than where the business is located
- Fictitious invoices or requests to alter invoices

We take personal responsibility to prevent fraud

We take personal responsibility to prevent waste and abuse that could compromise investor value and damage Enbridge's reputation.



How we work

We prevent **fraud** by:







- Never using our corporate credit card to pay for personal expenses
- Submitting (and approving if you are a people leader) only permitted, truthful, timely and complete expense claims and time reports with all required supporting documentation, including receipts
- Never falsifying invoices, expenses, time sheets, benefit claims or other documents
- Never attempting to conceal any transaction, and never overstating assets/revenue or understating liabilities/expenses
- Never taking Enbridge work equipment, tools, office supplies or other materials for personal use or gain

More information

- Enterprise Corporate Card and Business Expense Policy
- Accounting policies and resources

We take personal responsibility to prevent fraud

Red flags for fraud can take many forms and are often hidden—watch out for these risks

-  No supporting documentation for adjusting entries or documents that appear inadequate, misleading or altered
-  Discrepancies between invoices and payments
-  An employee or contractor who never takes vacation or sick leave or who is not willing to share duties with others
-  Lifestyle issues (e.g., addiction, financial pressures or living beyond means), divorce or medical problems
-  Frequent reliance on sole-source procurement practices
-  Persistent rumors of conflict of interest such as outside employment, **kickbacks** or relationships with vendors, contractors or suppliers



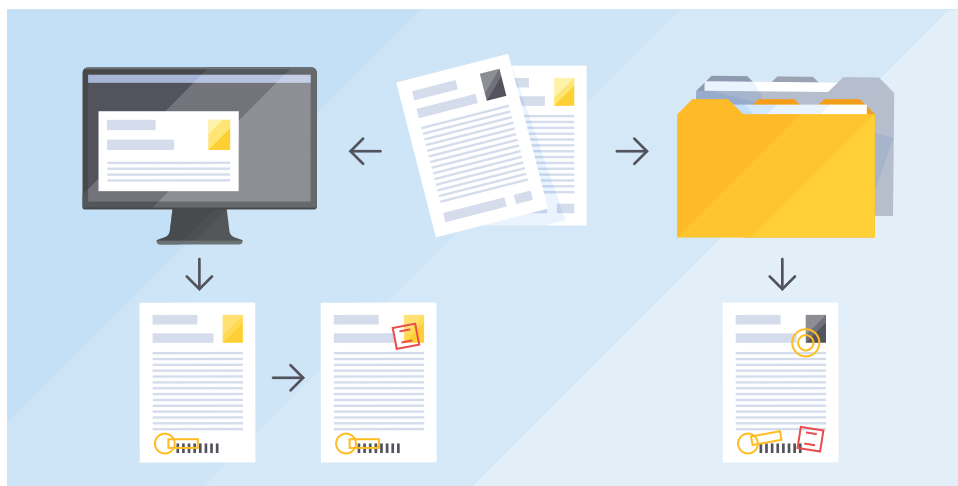
Learn more

The best way to detect workplace fraud is through tips. Report any suspicious activities or transactions to the Ethics & Compliance department, Internal Audit or the Ethics Helpline.

We ensure proper accounting, financial reporting and public disclosure

We believe that investors, lenders, regulators, shareholders and the public deserve full, timely, true and plain information about Enbridge's financial position.

We are committed to maintaining accurate books, financial records and internal controls, as well as to consistently communicating in a way that provides a complete and accurate picture of our company.



How we work

We ensure proper accounting, financial reporting and public disclosure by:

- Complying with all applicable laws, including the U.S. Sarbanes-Oxley Act (SOX) and applicable U.S. and Canadian Securities laws and all applicable policies
- Complying with Generally Accepted Accounting Principles (GAAP) and internal controls
- Keeping complete and accurate books of accounts, records and other financial documents
- Ensuring any presentations or proposals are truthful and do not contain inaccurate or misleading information
- Ensuring appropriate internal controls are in place and are followed
- Ensuring all contracts to which Enbridge is a party are documented in writing
- Never accepting any “side” or “comfort” letters which are not attachments to the main contract except on the advice of Legal Services

More information

- Disclosure Guidelines
- Enterprise Corporate Card and Business Expense Policy
- Contingent Workforce Travel and Expense Policy

We do not trade on inside information

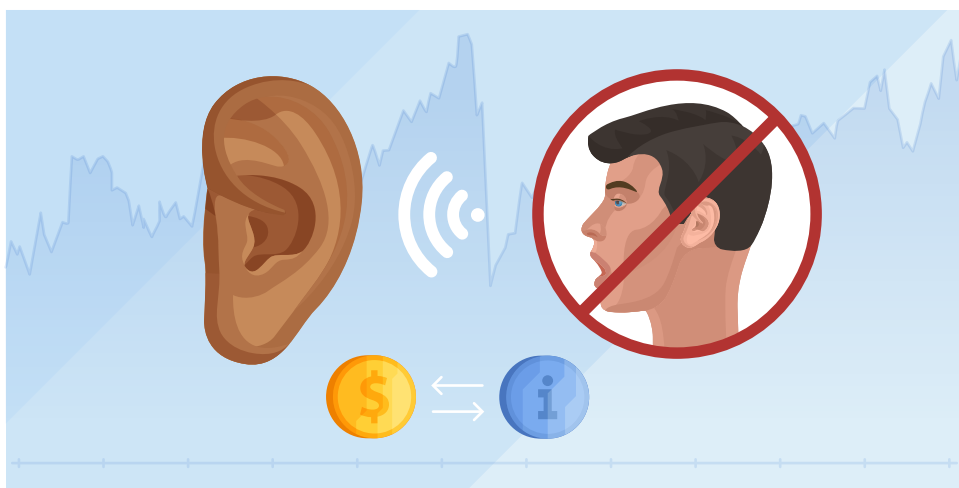
Selling or purchasing shares or other securities based on non-public information that could be material to an investment decision is illegal.

We never trade on non-public material information, and we do not share it with others who might use it for that purpose. This is known as “tipping” and is unfair and prohibited by law.

How we work

We avoid insider trading and tipping by:

- Using inside information of any Enbridge entity or any other entity for legitimate business purposes only and never to trade in stocks or other securities
- Never using inside information to encourage or recommend to anyone that they should purchase or sell shares or other securities
- Keeping all **non-public information** of Enbridge and business partners confidential and not disclosing it to others, whether internally or externally, except on a need-to-know basis or outside the necessary course of business












More information

- Disclosure Guidelines
- Insider Trading and Reporting Guidelines

We do not trade on inside information

Examples of non-public material information:

-  Unpublished financial results
-  Pending stock splits
-  Dividend policy changes
-  Expansions or curtailments of operations
-  Operational incidents
-  Proposed public or private sales of additional securities
-  Major reorganizations, amalgamations or mergers
-  Anticipated acquisitions or dispositions
-  Pending major litigation



Q&A

Q

A representative of one of Enbridge's shippers told me their company is in talks with another company to merge and suggested now would be a good time to buy some shares? Can I buy shares in those companies?

A

No. The shipper representative should not have provided you with that information and it is illegal and unethical for you to act on it. Additionally, because you received insider information about a company from another person you are also prohibited from disclosing that insider information to anyone.

Using undisclosed material information to purchase or sell securities, and tipping others to purchase and sell securities, can result in significant fines, jail sentences and disciplinary action, up to and including termination of employment.

We comply with international trade rules

At Enbridge, we believe compliance with international trade embargoes and sanctions, licensing and reporting requirements, as well as customs duties and taxes is necessary to ensure fair and efficient international commerce.



How we work

We comply with international trade rules by:

- Ensuring we do not do business with entities, individuals or countries subject to legal sanctions
- Ensuring we do not import or export products without all necessary licenses
- Accurately reporting our trade activities in accordance with applicable rules
- Applying accurate valuations for customs purposes and paying all applicable duties and taxes
- Complying with all export controls

Protecting our assets and data

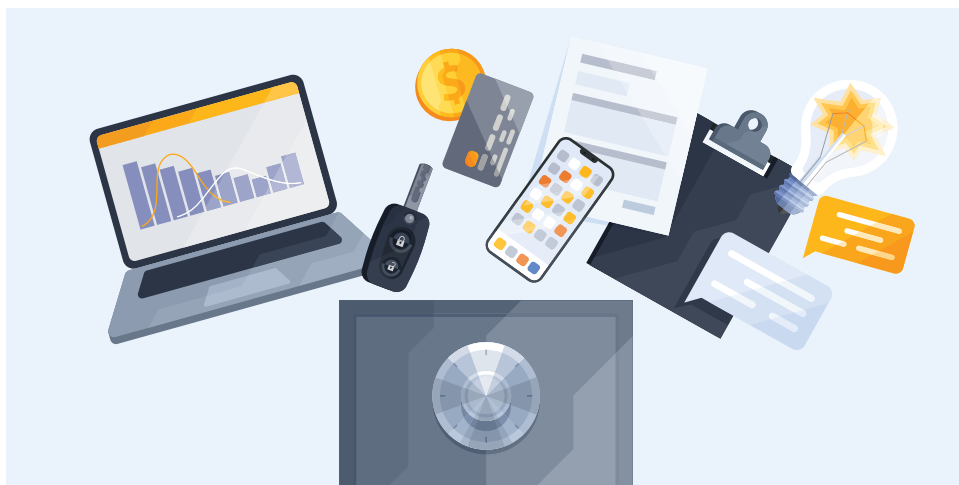
In this section:

- We protect our assets
- We are trusted with handling personal information
- We use social media respectfully and responsibly



We protect our assets

Everyone is responsible for the protection of Enbridge and third-parties' assets entrusted to us.



How we work

We protect our assets by:

- Not using Enbridge assets for personal use without express permission
- Never discussing or leaving confidential information or devices containing such information unsecured
- Vigilantly defending against cybersecurity threats including phishing attacks and reporting any suspected attempts
- Being aware of our physical surroundings and reporting anything that seems suspicious
- Promptly reporting any loss, damage, misuse or theft of any assets
- Classifying, storing and retaining **records** in accordance with Records Management Policies and Procedures
- Understanding all work produced while at Enbridge is the property of Enbridge

More information

- Acceptable Use of Technology Assets Policy
- RIM Policy and Information Classification Standard
- Security Policy
- Corporate Card / Travel Policies

We protect our assets

Assets include everything that we own/use to conduct business



Financial Assets
(funds and corporate credit cards)



Computing Assets
(computers, mobile devices and software)



Physical Assets
(buildings, office/job site equipment, tools, supplies, materials, vehicles, PPE and cell phones)



Data Assets
(confidential or restricted business information, customer information, intellectual property and records)



Intellectual Assets
(proprietary and confidential information such as inventions, concepts, strategies, trademarks and designs)



Learn more

Confidential or restricted business information should never be discussed in public places where the discussion may be overheard.

We protect our assets

Q&A

Q

Can I check my personal email or social media at work?

A

You must use Enbridge technology assets securely and responsibly in accordance with policies that establish security and use standards. Although limited incidental personal use is allowed, these devices are meant primarily for business purposes. Enbridge technology assets must never be used for improper or illegal purposes such as gambling, communicating, possessing, displaying, storing, sharing or distributing pornographic, obscene, offensive or sexually suggestive materials or content.

Please remember, Enbridge assets are company property and are subject to review, audit, interception and monitoring. You should have no expectation of privacy when using Enbridge computing assets and networks.

Q

What do I do if I am put under a legal hold?

A

Follow the **Legal Hold** rules:

- 1 Do not destroy any email as identified under a legal hold.
- 2 Create an email management folder classified as a record.
- 3 If in doubt, retain your records.

We are trusted with handling personal information

At Enbridge we safeguard all personal information in our custody, including personnel, landowner and residential utility customer information.

Privacy laws are quickly evolving in North America and other jurisdictions. These laws outline how personal information can be viewed, collected, stored, processed, transferred or destroyed. It's important to understand what personal information is so you can safeguard it and report any suspected privacy breaches.

How we work

We are trusted with handling **personal information** by:

- Being able to identify personal information
- Limiting the amount of personal information collected, used and disclosed
- Responsibly storing personal information in secure locations
- Responsibly transmitting personal information using a secure method
- Responsibly disposing of personal information when no longer needed
- Collecting, accessing and sharing personal information only when there is a clear justifiable business purpose

Social insurance
or security numbers

Credit card
information

Resumes

Date of birth

Landowner
information



Customer account
and transaction details

Medical information

Demographic
information

Personal contact
information

Payroll or benefit
information

More information

- Internal Privacy Policy
- Enbridge Inc. (and Enbridge Gas Inc.) external facing Privacy Statements

We are trusted with handling personal information

Q&A

Q

I accidentally sent an email containing compensation details of my direct report to the wrong person. Is this a privacy breach and should I report it?

A

Yes, and yes. Even though it was an accident, this was an improper disclosure of personal information and should be reported to the Privacy Office.

Q

I'm a SharePoint site administrator and have access to all of our team's files, which I know contain personal information. Because of these enhanced admin rights, can I look through the files?

A

No. Even though you can view, that doesn't mean you should. Having enhanced access permissions is not a license to snoop. You require a justifiable business purpose before viewing files that contain personal information. **Snooping** may result in discipline, up to and including termination of employment or contract.

We are trusted with handling personal information

Q&A

Q

A friend asked if I could tell them why their gas bill went up this month. Can I look it up?

A

No, even if your intentions are to help. Enbridge team members may have privileged access to internal platforms or systems that contain personal information but viewing information within these systems should only be done if there is a justifiable business purpose for accessing that particular information. Snooping may result in discipline, up to and including termination of employment or contract.

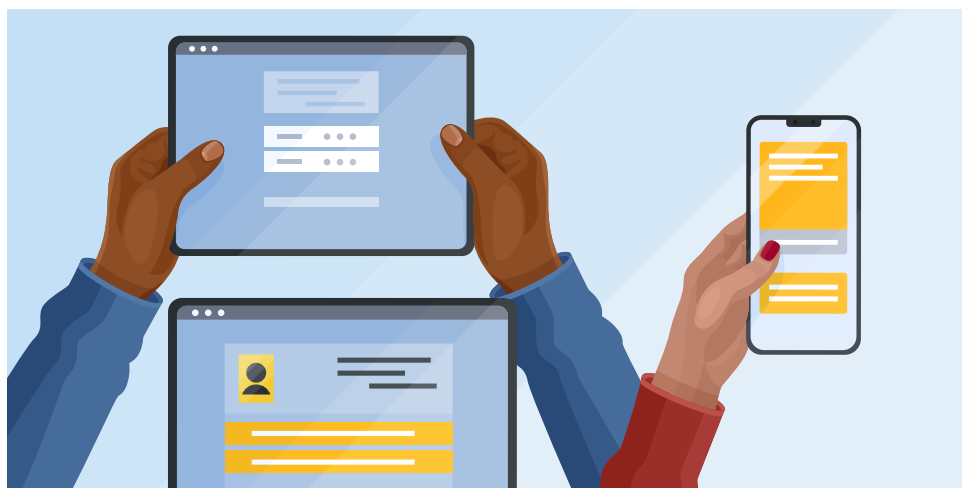
We use social media respectfully and responsibly

We communicate on social media responsibly, with integrity and respect, always ensuring our comments are business appropriate.

How we work

We use personal social media channels respectfully and responsibly by:

- Being aware that our online activities may reflect on Enbridge
- Never disclosing Enbridge confidential information or information that could harm the reputation of Enbridge and/or any of its employees, customers, contractors, suppliers, vendors, business partners or landowners
- Letting people know when views expressed are our own and not those of Enbridge



More information

- Social Media and Internet Postings Policy
- Acceptable Use of Computing Assets Policy
- Internal Privacy Policy

Speaking up

In this section:

- We speak up when we have concerns
 - We investigate fairly
-



We speak up when we have concerns

Fostering an ethical culture is critical to our business success. A culture that encourages us to voice our good-faith concerns will help maintain Enbridge as a great place to work.

If something does not feel right, we should all feel empowered to act without fear of threat, retaliation, discrimination or discipline.



How we work

We promote a speak-up culture by:

- Acting courageously to raise concerns in **good faith** about safety or operational issues, misconduct or violations of laws, regulations, internal policies or procedures
- Respecting confidentiality of the reporter to the extent allowed by law and policy
- Taking action to address issues and concerns raised
- Holding wrong doers accountable
- Protecting against retaliation

More information

- Ethics Helpline
- Whistleblower Policy

We speak up when we have concerns

Speaking up

To report a possible violation or seek guidance, reach out to:



People leaders



The Ethics & Compliance
department



Enbridge's Chief Compliance
Officer



Human Resources



Legal Services



Internal Audit

We speak up when we have concerns

When we are not comfortable reporting issues using internal communication channels, then Enbridge's Ethics Helpline is always available.



Learn more

The Ethics Helpline should not be used to report issues or complaints about workplace relationships, performance evaluations, wages or benefits, unless the issue involves a potential violation of Enbridge policies or suspected illegal or unethical behavior.



CALL
1-866-571-4989

WEB
enbridgeethics
helpline.com

TEXT
1-281-688-2605

Ethics Helpline

Independent. Confidential. Anonymous.

**Report misconduct, ethical issues
or ask questions relating to:**

- Business conduct concerns
- Environment, health and safety concerns
- Financial concerns
- Respectful workplace and harassment concerns
- Retaliation • Theft or misuse of assets

 **ENBRIDGE**
Life Takes Energy

powered by 
convercent

We investigate fairly

Enbridge investigates all reports of violations or suspected violations of the Statement of Business Conduct promptly, fairly and in accordance with our legal responsibilities.

Everyone who works at Enbridge must cooperate and be truthful when asked to participate in or give statements during the course of an investigation.

How we work

We investigate fairly by:

- Following a consistent process
- Assigning independent and skilled investigators
- Treating all investigation participants impartially and maintaining confidentiality
- Focusing on the facts
- Supporting findings with evidence
- Monitoring against retaliation



We investigate fairly

Investigations process



1. Initiate

Matter is submitted through:

- 24/7 Enbridge Ethics Helpline
- Human Resources
- People leader
- Ethics & Compliance department (E&C)



4. Investigate

If threshold is met, E&C formally investigates the matter. If not, the issue is addressed outside the investigation process.



2. Notify

E&C receives notification from the Ethics Helpline or directly from the employee/contingent worker/contractor.



5. Conclude and address

E&C determines outcome based on evidence and credibility. If applicable, corrective actions are implemented.



3. Review

E&C reviews information to determine if the threshold for a formal investigation is met.



6. Report

All significant matters are reported directly to the Enbridge Inc. Board of Directors – Audit, Finance & Risk Committee.

We investigate fairly

Enbridge does not allow threats, retaliation, discrimination or discipline against anyone who makes a good faith report (either internally or to a government authority) or otherwise participates in or assists with an investigation.

An act of retaliation violates the policy and in many cases, it may also be against the law. However, disciplinary action may be taken against an individual if they participated in a prohibited activity, even if they reported it. Additionally, disciplinary action, up to and including termination, may be taken against anyone who makes a report or allegation that they know to be false.

**Learn more**

Retaliation is strictly prohibited and will result in discipline up to and including termination.

Ways retaliation can present itself



Reassignment



Blocking advancement



Hostility



Exclusion

We investigate fairly

Q&A

Q

After reporting a concern, I have been excluded from a team activity and denied a professional development learning opportunity – is this retaliation?

A

Assessment of the facts and circumstances surrounding such action is necessary to determine whether it's retaliatory. You are protected from threats, retaliation, discrimination, or discipline for making a good faith report (either internally or to a government authority) or otherwise participating in or assisting with an investigation.

Behavior that interferes with work or creates an offensive, intimidating, disruptive, abusive, or hostile work environment is prohibited and can result in disciplinary action, up to and including termination.

Resources

In this section:

- [Glossary](#)
 - [Governing policies](#)
-



Glossary

Affiliate – A person (including a corporation, partnership, etc.) is an affiliate of another person if it directly or indirectly controls, is controlled by or is under common control with the other person. “Control” means the power to direct the management and policies of the other person, whether through the ownership of voting securities, by contract or otherwise.

Anything of value – Includes payments of cash and other items of value such as stocks or discounts, loans, offers for non-monetary benefits, such as gifts, travel, entertainment, political or charitable contributions, a promise of future employment, paid or unpaid internships, or personal favors such as the hiring of a family member or friend of the official. If such benefits are provided in exchange for an official decision or some business advantage, they are illegal.

Blocking advancement – Failing to recognize work well done, baseless negative performance review, providing negative recommendation or potential job loss.

Bribe – Occurs when someone gives or promises another person something of value to their benefit or favorable treatment. Bribes do not always come in the form of cash, bank transfers or even gifts. They can take the form of anything with value, such as job offers, contracts, or favors for family and friends.

Conflict of interest – Occurs when an individual’s actual, perceived, or potential personal, financial, or non-financial interests compromises or appears to compromise judgment, decisions or actions in the workplace and competes with Enbridge’s interests.

Discrimination – Unfavorable treatment on the basis of a prohibited ground laid out in applicable human rights legislation, which varies by jurisdiction but may include discrimination based on race, ancestry, place of origin, colour, ethnic origin, citizenship, religion or creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability.

Due diligence – The screening and evaluation that a company conducts to understand and mitigate risk.

Exclusion – Withholding information or exclusion from training sessions or team member lunches or outings. Relocating where the team member sits for the purpose of exclusion.

Facilitation payments (or “grease” payments) – Payments made to a Public Official to secure or speed up routine, non-discretionary and legal government actions. Examples include payments made to a public official to get or expedite permits, process government papers, provide police protection and schedule inspections.

Financial crime – Involves fraudulent or dishonest conduct for the purpose of enriching oneself or others financially, or the conversion of property or proceeds to conceal a crime. Some of the most common examples are terrorist financing, money laundering, facilitation of tax evasion, bribery, corruption and fraud.

Fraud – A deliberate deception by someone to gain or to secure an unfair advantage over a person or an organization. If committed by an Enbridge employee, contingent worker or contractor, fraud is a serious breach of trust of the employment or contractual relationship and may result in termination of employment or contract as well as criminal charges.

Good faith reporting – Not having malicious intent and not purposefully giving misleading or false information when reporting concerns or issues.

Government or state-owned entities – A legal entity created by a government to partake in commercial activities on the government’s behalf. It can be either wholly- or partially-owned by a government and is typically earmarked to participate in specific commercial activities.

Gun-jumping – Prematurely sharing sensitive information, making management decisions, integrating operations or behaving as though a transaction (merger, acquisition, or divestiture) has been completed which could result in the transaction not being approved by regulators and/or significant fines.

Hostility – Intimidating, verbal or visible threats, harassment and bullying. Condoning bad behavior towards the team member by other team members or online harassment.

Indigenous peoples – In Canada, First Nations, Inuit and Métis peoples of Canada, including bands established under the Indian Act, Métis locals or regions (or entities owned by such a band, local or region). In the United States of America, members of American Indian and Alaskan Native tribal entities who have government-to-government relationships with the federal government of the United States of America. In both cases, this also includes their representatives.

Kickbacks – Payments that may be given or received in return for a favorable decision, outcome or business transaction. For example, if an Enbridge vendor pays a percentage of its service fee to an Enbridge employee in exchange for the employee’s agreement to send more Enbridge business to the vendor, the payment to the employee is a kickback.

Launder money – The use, transfer, alteration, disposal, possession of, or other dealings or entering into transactions with property (or the proceeds of property) obtained or derived from a crime/offense in order to conceal, disguise or convert that property or proceeds.

Glossary

Legal Hold – A written directive to suspend disposition of potentially relevant records and transitory material. A legal hold is issued by an Enbridge Law department in response to a possible discoverable event, such as a regulatory inquiry, investigation, audit, litigation or claim.

Lobbying – The process of articulating one’s position on an issue to government officials to influence legislation or government policy.

Non-public material information – Any material information relating to the business and affairs of Enbridge that has not been generally disclosed to the public and that, if known, would result, or be reasonably expected to result, in a significant change in the market price or value of any securities of Enbridge. Material information is considered non-public until at least two clear trading days have passed after the public release of the information.

Personal information – Data linked to an identifiable person such as social insurance or security numbers, personal contact information (like home or email addresses, or date of birth), medical information, individual customer account and transaction details, landowner information, and resumes.

Public Officials – Representatives, officers or employees of a state-owned or controlled enterprise, including any person acting in an official capacity for or on behalf of any state or political party as well as anyone acting on behalf of Indigenous peoples.

Examples can include elected representatives of government, executives and employees of state-owned enterprises, employees of regulatory agencies and law enforcement officers.

Privacy breach – The unauthorized collection/use/access/disclosure of personal information.

Reassignment – Assigning different duties or moving an individual into a different position, arbitrarily increasing workload, cutting hours or shifts or demotion.

Record – Recorded information in any format, medium or location which provides evidence of Enbridge business transactions, decisions and other significant actions and is required to be retained in accordance with Enbridge’s Records Retention Schedule.

Snooping – The access of personal information for the non-job-related reason, whether or not the access is malicious or out of good will.

Third party – An Enbridge supplier, customer, agent, consultant, joint venture partner or merger/acquisition target.

Governing policies

The following policies are governed by the Statement on Business Conduct:

- Acceptable Use of Technology Assets Policy
- Accounting policies
- Affiliate Relationship Code
- Anti-Bribery and Anti-Corruption and other Financial (ABC) Crimes Policy
- Authorities and Spending Limits Policy (Canada and US)
- Canadian Anti-Spam Legislation Standard
- Competing Fairly Policy
- Contingent Workforce Travel and Expense Policy
- Contracting or Hiring of Family and Friends Policy
- Corporate Social Responsibility Policy
- Diversity and Inclusion Policy
- Disclosure Guidelines
- Enterprise Corporate Card and Business Expense Policy
- Enterprise Security Policy
- Enterprise Travel Management Policy
- Equal Employment Opportunity Policy
- Insider Trading and Reporting Guidelines
- Internal Privacy Policy
- Lifesaving Rules
- Political Contributions Policy
- Records Information Management (RIM) Policy
- Respectful Workplace, Harassment, Violence Policies (Canada and US)
- Safety and Reliability Policy
- Social Media and Internet Postings Policy
- Spokesperson Policy
- Supplier Code of Conduct
- Whistle Blower Policy
- Workplace Alcohol and Drug Policy (Canada and US)

Applicability: Applied to Enterprise

Owner: Ethics & Compliance

Approval: May 2022

Effective Date: May 2022

