



Fighting against forced labour and child labour in supply chains report

February 2024



Steps taken to prevent and reduce risks of forced labour and child labour

At Enbridge, our goal is to be the first-choice energy delivery company in North America and beyond – for customers, communities, investors, regulators and policymakers, and employees. Our Company's values are Safety, Integrity, Respect, Inclusion and High Performance. We aim to make a difference, economically and socially – as an industry leader, an exceptional employer, and as a responsible corporate citizen. We are committed to operating in a safe, ethical, inclusive, transparent, and socially and environmentally responsible manner, including respecting human and Indigenous rights, and meaningfully engaging with and learning from our employees and the communities where we live and work.

Enbridge has policies and processes in place to prevent and reduce the risks of forced labour and child labour in our operations and supply chains, outlined in more detail further in this report. These policies and processes apply enterprise-wide and support our commitment to upholding human rights. We have a zero-tolerance policy for human rights abuses, which extends to the use of forced labour and child labour. Our commitment is supported by an internal Third-Party Risk Management (TPRM) Program, which is designed to screen, evaluate and continually monitor suppliers and prospective suppliers to identify potential human rights risks (in addition to other risks, including sanctions, anti-bribery/anti-corruption, and anti-money laundering, terrorist financing and facilitation of tax evasion laws). We also use EcoVadis, a leading platform, for supplier sustainability assessments and performance management for our top suppliers, in four key dimensions, including labour and human rights (together with environment, ethics and sustainable procurement).

In addition to our existing human rights policies and practices, in the preceding year, Enbridge has taken additional steps to prevent and further reduce the risk of forced or child labour in our supply chains, including:

- Discussing the Act and its requirements with our Board of Directors and applicable committees, and raising awareness of our broader human rights policies and processes with senior management in each of our business units
- Convening an internal working group to examine our current practices and to maintain and enhance our existing governance framework to manage modern slavery risks within our business and supply chains
- Engaging a third-party consultant to advise on international best practices regarding the prevention and reduction of forced labour and child labour in supply chains
- Providing awareness training and information to our Supply Chain Management department regarding modern slavery risks and developing further training to deploy in 2024
- Managing human rights performance of our key suppliers (for approximately 40% of our total supplier spend), based on EcoVadis results, including requiring suppliers rated as medium and high risk to submit human rights policies for review
- Identifying the areas of our business and supply chains that carry a higher risk of forced labour and child labour and taking steps to actively manage that risk, including engaging an independent third party to conduct supply chain traceability audits on solar panel manufacturers and their sources of supply and requiring enhanced contractual terms for solar panel suppliers

About this report

This joint report is made pursuant to subsection 11(2) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C., 2023, c.9 (the Act) and has been prepared on behalf of Enbridge Inc. (Enbridge) and the applicable entities which it controls, including joint ventures which it operates. Headquartered in Calgary, Alberta, Enbridge's common shares trade under the symbol ENB on the Toronto (TSX) and New York (NYSE) stock exchanges. At Enbridge, we safely connect millions of people to the energy they rely on every day, fueling quality of life through our North American natural gas, oil or renewable power networks and our growing European offshore wind portfolio. To learn more, visit us at enbridge.com.

As required by the Act, this report summarizes the steps that we have taken in the financial year ended December 31, 2023 to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada by Enbridge or of goods imported into Canada by Enbridge.

The terms “we,” “our,” “us,” “Company,” and “Enbridge” as used in this document refer collectively to Enbridge Inc., its subsidiaries, and the joint ventures which it operates, unless the context suggests otherwise. These terms are used for convenience only and are not intended as a precise description of any separate legal entity within Enbridge.

Structure, activities and supply chains

Our structure and activities

Enbridge Inc. is a Canadian company incorporated under the *Canada Business Corporations Act*. Headquartered in Calgary, Alberta, Enbridge's common shares trade under the symbol ENB on the Toronto (TSX) and New York (NYSE) stock exchanges.

At Enbridge, we safely connect millions of people to the energy they rely on every day, fueling quality of life through our North American natural gas, oil or renewable power networks and our growing European offshore wind portfolio. We're investing in modern energy delivery infrastructure to sustain access to secure, affordable energy and building on two decades of experience in renewable energy to advance new technologies including wind and solar power, hydrogen, renewable natural gas and carbon capture and storage. We're committed to reducing the carbon footprint of the energy we deliver, and to our goal of achieving net zero greenhouse gas emissions from our operations by 2050. To learn more, visit us at enbridge.com.

While Enbridge does not generally produce or sell goods, we do distribute and import goods in Canada and elsewhere as part of our operations and supply chains. Our operations are based in North America and Europe, where strong human rights legislation is enforced.

Our activities are carried out through our five business segments:

- **Liquids Pipelines**, which consists of pipelines and terminals in Canada and the U.S. that transport and export various grades of crude oil and other liquid hydrocarbons.
- **Gas Transmission and Midstream**, which consists of investments in natural gas pipelines and gathering and processing facilities in Canada and the U.S.
- **Gas Distribution and Storage**, which consists of natural gas utility operations, the core of which is Enbridge Gas Inc., which serves residential, commercial and industrial customers throughout Ontario. This business segment also includes natural gas distribution activities in Quebec.

- **Renewable Power Generation**, which consists primarily of investments in wind and solar assets, as well as geothermal, waste heat recovery and transmission assets. In North America, assets are primarily located in the provinces of Alberta, Ontario and Quebec, and in the states of Colorado, Texas, Indiana, Ohio and West Virginia. In Europe, we hold equity interests in operating offshore wind facilities in the coastal waters of the United Kingdom, France and Germany, as well as interests in several offshore wind projects under construction and active development in France and the United Kingdom.
- **Energy Services**, which provide physical commodity marketing and logistical services to North American refiners, producers and other customers in Canada and the U.S.

Our supply chains

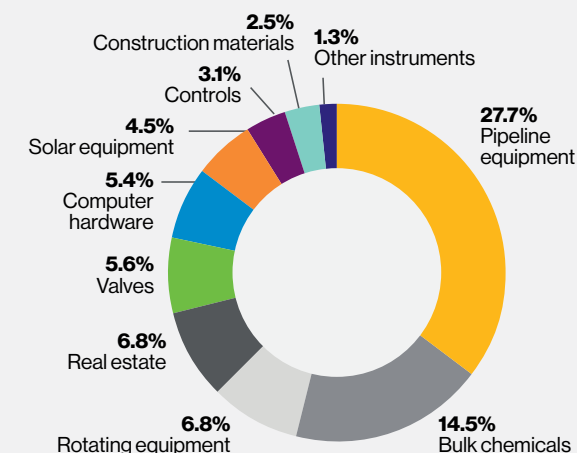
The Enbridge supply chains consist of over 10,000 active global (but primarily North American) suppliers that provide materials, goods and services to Enbridge, including contractors, subcontractors, vendors and consultants. Our suppliers play a key role in our ability to live up to our sustainability commitments and attain our environmental, social and governance (ESG) goals. To that end, we focus on working with suppliers who:

- Strive to be leaders in their industries
- Are willing to uphold our core values of Safety, Integrity, Respect, Inclusion and High Performance
- Adhere to key policies and procedures (including those outlined in this report)
- Share our commitment to the highest standard of business conduct

For the financial year ended December 31, 2023, Enbridge's goods-related expenditures comprised approximately 17% of Enbridge's total supply chain expenditures, sourced primarily in North America. The following graphics illustrate the top ten categories of expenditures by Enbridge for goods during the financial year ended December 31, 2023, as well as the geographical sources of those goods.

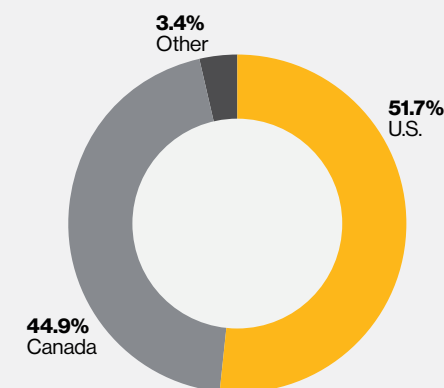
Top ten goods expenditures in 2023

As a percentage of total goods-related spend



Geographic source* of goods purchased in 2023

As a percentage of total goods-related spend



* Geographical source is based on a company's head office location. Other countries include but are not limited to United Kingdom, Ireland, Netherlands, United Arab Emirates, Brazil, Norway, Germany and Sweden.

Policies and due diligence processes in relation to forced labour and child labour

Our policies

Enbridge has adopted and implemented a number of policies and practices that support human rights and socially responsible business practices. Respect for human rights is embedded in our core values and all aspects of our business. Our operating practices are informed by the United Nations (UN) International Bill of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the Organization for Economic Co-operation and Development's Guidelines for Multinational Enterprises. Enbridge has been a signatory to the UN Global Compact since 2003 and reports on progress annually (available publicly on the UN Global Compact website).

Enbridge requires its suppliers to adhere to a [list of Enbridge policies](#), which includes the following key policies: Sustainability Policy, Statement on Business Conduct and Supplier Code of Conduct.

Sustainability Policy

Our [Sustainability Policy](#) highlights our commitment to respect human rights, guided by the following principles:

- Striving to build trust and demonstrate respect for human dignity and rights in our interactions
- Adopting a preventative approach that seeks to ensure Enbridge does not cause or contribute to adverse human rights impacts through our activities
- Recognizing the distinct rights of Indigenous peoples (see also our [Indigenous Peoples Policy](#))
- Respecting the rights of others to express their views freely, including human rights defenders who lawfully exercise their right to protect recognized human rights through peaceful means
- Upholding the Ten Principles of the UN Global Compact
- Adopting a zero-tolerance policy for human rights abuses, which extends to the use of forced labour and child labour in any form in our operations or supply chains

- Working with governments and agencies to support and respect human rights and raise awareness within our sphere of influence
- Providing ongoing leadership, resources, training and monitoring to ensure the effective implementation of these principles and continuing to engage with others to ensure respect for human rights throughout our operations (and expecting the same of our suppliers)

Statement on Business Conduct

Our [Statement on Business Conduct](#) (SOBC) outlines the principles governing the behaviour and standards of conduct we expect of ourselves and each other. It's our north star and what helps us ensure we do the right thing as a company and as individuals. One of the core principles in the SOBC is upholding 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 forced or child labour, in our operations, supply chains or by the third parties we do business with. One of the ways we uphold human rights is 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. We require our suppliers to adhere to our core values and to uphold the human rights, labour, health, safety, environmental, and business ethics practices prescribed in our key policies.

Supplier Code of Conduct

Enbridge maintains a [Supplier Code of Conduct](#), (Code), which outlines Enbridge's requirements regarding the ethical standards and business conduct of our suppliers. All Enbridge suppliers are required to adhere to the Code, and this requirement is incorporated into contractual requirements. Under the labour and human rights provisions of the Code, all suppliers are required to operate in a socially responsible and non-discriminatory manner, in full compliance with all applicable laws, and must respect the human rights of workers.

Suppliers are required to have a third-party risk management program in place for onboarding and monitoring their own suppliers to mitigate third-party risk, including human rights and fair labour standards. Suppliers must conduct due diligence in respect of, and impose controls, including contractual obligations, in respect of their suppliers that present a risk of non-compliance. Suppliers are prohibited from using, in connection with the work they perform for Enbridge, third parties that are known to violate the standards set out in the Code.

Among other protections for workers, the Code includes specific requirements related to forced labour and child labour:

- Suppliers shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities.
- Suppliers shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labour. All work must be voluntary, and workers must be free to leave work or terminate their employment upon reasonable notice.
- Workers must not be required to surrender any government issued identification, passports or work permits as a condition of employment.
- Suppliers shall ensure that third-party agencies providing workers are compliant with the Code and the laws of the sending and receiving countries, whichever is more stringent.
- Suppliers must ensure that contracts for direct and contract workers clearly convey the conditions of employment in a language understood by the worker.
- The acceptable minimum age for employees is 15 years – as far as necessary and only if national law permits, children under the age of 15 are only permitted to engage in light work if it does not interfere with compulsory schooling.
- Employees under the age of 18 years are not to be involved in night work or work that is hazardous or likely to have a negative impact on their physical or mental development.

Our due diligence processes

Supplier onboarding

Supply Chain Management (SCM) is a centralized function within Enbridge responsible for all aspects of the supply chain management process across the Company. This includes planning and governance, strategic sourcing and tactical procurement, materials management, logistics, accounts payable and contract management.

Ethics & Compliance (E&C) is another centralized function within Enbridge responsible for implementing and administering ethics and compliance programs across the Company, including our TPRM Program, which is part of the onboarding registration process for all prospective suppliers¹.

Our TPRM Program is designed to:

- Screen, evaluate and continually monitor joint venture (JV) partners, and suppliers to identify the risk of non-compliance with sanctions, anti-bribery and anti-corruption, human rights and anti-money laundering, terrorist financing and facilitation of tax evasion laws
- Screen, evaluate and continually monitor customers to identify the risk of non-compliance with sanctions
- Screen and evaluate merger and acquisition (M&A) targets to identify the risk of non-compliance with sanctions, anti-bribery and anti-corruption, human rights and anti-money laundering, terrorist financing and facilitation of tax evasion laws
- Ensure enhanced due diligence is performed in respect of certain third parties flagged as medium or high risk
- Develop a plan for mitigating and managing compliance risks, including imposing contractual obligations and training requirements, prior to entering into a contract and over the course of the relationship with suppliers, JV partners, and M&A targets

- Support contractual commitments and representations made to lenders, JV partners, and other entities with which we do business
- Demonstrate to regulators that we have acted with due diligence to ensure the compliance risks associated with our third parties are being managed effectively

A cross-functional executive level committee, representing SCM, E&C and Technology and Information Services, is responsible for overseeing the TPRM Program and its continuous improvement, as well as ensuring a broad view of the risks posed by third parties.

For suppliers, the TPRM Program involves an assessment of risk based on a number of factors, including:

- Country in which the supplier is located
- Type of good or service being provided
- Performance of due diligence against a database which includes sanctions, regulatory violations, adverse media, etc.
- Review of any supplier compliance and/or TPRM Program documentation provided with the questionnaire

A more detailed questionnaire is completed by suppliers assessed as medium or high risk, which includes identification of the countries where the supplier and its ultimate parent are headquartered, countries in which the goods are manufactured, and countries from which the goods and key components originate. The questionnaire also asks whether the supplier has a compliance program and third-party risk management program and if so, whether these programs address human rights. Suppliers are also requested to provide supporting documentation.

Ongoing supplier management

Once a supplier has been registered and onboarded, Enbridge continues to manage and mitigate risks throughout the course of the relationship with the supplier. Under the TPRM Program, suppliers are assigned a risk level (low, medium or high) and periodic risk assessments are conducted based on the supplier's risk level. We aim to complete assessments every three years for low-risk suppliers, every two years for medium-risk suppliers, and every year for high risk suppliers. In addition, we use an automated service to conduct nightly searches on suppliers – and in the case of medium- and high risk suppliers, individuals, suppliers' contractors and affiliates are also searched for any indications of financial crimes or human rights abuses, including forced labour and child labour.

If a potential concern is flagged, E&C receives a notification to review the information and confirm the supplier's risk level. Where appropriate, we update the supplier's risk rating and may recommend mitigation measures or corrective actions, such as additional training or specific contractual clauses. Mitigation measures are tracked and escalated if necessary, and there are various decision points in the process to determine whether to continue the relationship with the supplier.

In addition to the TPRM Program, our SCM department uses EcoVadis for supplier sustainability assessments and performance management. EcoVadis' methodology is based on sustainability standards that include the Ten Principles of the UN Global Compact, ILO conventions, and the Global Reporting Initiative (GRI) standards. In 2022, we advanced an initiative to gather sustainability data from our top suppliers on four key dimensions: environment, labour and human rights, ethics and sustainable procurement, which we continued into 2023.

We currently use EcoVadis to manage our key suppliers, representing approximately 40% of our overall supplier spend. The EcoVadis platform uses questionnaires, customized based on the supplier's industry, geography and size, as well as benchmarking tools, to generate a scorecard for each supplier. Suppliers are

¹ The TPRM Program does not currently extend to suppliers located in Quebec due to French language requirements or to suppliers of Tidal Energy Marketing Ltd., whose business is primarily energy marketing in North America, and therefore whose supply chains are limited. Work is underway to expand the scope of the TPRM Program to incorporate these suppliers.

assigned an overall low, medium or high risk rating, along with scores for each of the four key dimensions. The report also summarizes each supplier's strengths, areas for improvement and watch areas. Our SCM department uses these reports to manage supplier performance, including, where appropriate, identifying corrective actions, such as additional training in certain areas. In 2023, SCM requested all suppliers rated as medium and high risk to submit human rights policies, and the review of these policies is currently underway. The SCM department also holds periodic meetings with each of our key suppliers – at least annually, depending on risk level – to discuss the supplier's performance, including the EcoVadis report and risk scores, together with corrective actions, if any.

Contractual requirements

Suppliers are contractually required to comply with all applicable laws and to adhere to applicable Company policies, including the SOBC, Code and Sustainability Policy. Failure to comply with applicable laws or Company policies constitutes a material breach of the agreement, which allows the Company to take immediate remedial steps, including termination. All Enbridge Authorized Contract Templates for construction and services, including Master Service Agreements, Engineering Service Agreements, Geological Assessment Services Agreements, and Construction Agreements, contain specific forced labour and child labour provisions.

“ 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. ”

– Enbridge Statement on Business Conduct

Reporting concerns

We strongly believe in maintaining a culture where our employees and contingent workers feel empowered and supported in conducting business the right way and foster a “speak up culture” to encourage reporting of concerns about potential misconduct or violations of law or policy. If an employee, contractor or other third-party becomes aware of a potential issue involving forced labour or child labour, there are various avenues to report concerns, including through our Ethics Helpline, operated by an independent third-party provider. The Ethics Helpline facilitates the anonymous reporting of potentially illegal, unethical or improper conduct, and is accessible through multiple mediums, anywhere in the world, 24/7. Enbridge also strictly prohibits retaliation for good faith reporting of misconduct.

SCM policies require contractors or employees to report non-compliances, and upon confirmation of non-compliance, Enbridge may take remedial action, including terminating the relationship with the employee or contractor.

Participation in human rights organizations, industry associations and peer working groups

As a signatory to the UN Global Compact, Enbridge is committed to supporting human rights. We collaborate with organizations and industry associations like the American Clean Power Association and the Canadian Renewable Energy Association on human rights issues, including the issue of forced labour in the sourcing of raw materials and manufacture of solar panels. Enbridge also collaborates with peer companies and legal experts to share best practices.



Any measures taken to remediate forced labour or child labour

Enbridge has not identified any instances of forced or child labour in its activities and supply chains within the financial year ended December 31, 2023, and therefore, no remediation measures have been taken.

Any measures taken to remediate the loss of income to the most vulnerable families

Enbridge has not identified any instances of forced or child labour in its activities and supply chains within the financial year ended December 31, 2023, and has, therefore, not needed to take any measure to eliminate the use of forced labour or child labour. Accordingly, there is no loss of income to remediate.

Parts of the business and supply chains that carry a risk of forced labour and child labour and steps to manage that risk

Enbridge has identified certain areas of its business and supply chains that carry a risk of forced labour and child labour, based on countries and goods that are at a higher risk for human rights violations. We have processes in place to manage these risks during onboarding and throughout the duration of the relationship with the supplier, as outlined in the section above.

Any suppliers involving specific risk areas are automatically flagged by our TPRM Program algorithms as high risk and are reviewed in detail by the TPRM Program team. Our algorithms currently flag suppliers and their sources of supply from countries (including China) that have a higher rating on the Transparency International's Corruption Perceptions Index, many of which countries are also implicated in human rights abuses. Our algorithms also flag goods known to contain key components or raw materials listed on the

U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor and the *List of Products Produced by Forced or Indentured Child Labor*. Higher risk goods currently flagged by our algorithms include solar panels, lithium-ion batteries, and wind turbines. Our Supply Chain Management group also regularly reviews certain categories of purchases for conflict minerals, in accordance with the Dodd Frank legislation in the U.S.

Enbridge continues to build our renewables portfolio, with projects in various stages of development. Because solar panel purchases carry with them a particular risk of forced labor, we have engaged an independent third party to conduct supply chain traceability audits on solar panel manufacturers. In addition, for products where we identify a particular risk of forced labour or child labour,

we ask potential suppliers specific questions related to forced labour in requests for proposals, including.

- Supplier(s) and origin of key component(s)/raw material(s)
- Confirmation of traceability
- Steps taken by the supplier to ensure that forced labour or child labour is not used in its supply chain

We also conduct extensive due diligence complemented with secondary due diligence by an external expert, with a focus on forced labour and child labour, including in the suppliers' own supply chains. Enbridge's solar panel suppliers are also required to provide more extensive contractual assurances regarding the absence of forced labour in their supply chains.

Training provided to employees on forced labour and child labour

On the commencement of employment with Enbridge and annually thereafter, all Enbridge employees and contingent workers active in the Company's human resources information system are required to complete SOBC training and certify compliance with it. The SOBC training contains specific content relating to avoiding human rights violations, including forced labour, child labour and human trafficking. Each member of the Enbridge Board of Directors must also certify their compliance with the SOBC on an annual basis. In addition, our Supplier Code of Conduct outlines expectations of supplier performance and is supplemented, where risk is identified, by the third-party risk training, which educates suppliers on the prohibition against forced labour and child labour and how to report suspected human rights and other violations.

Enbridge also provides access (on a voluntary but trackable basis) to TPRM Program training on financial crimes, which includes an overview of Enbridge's expectations with respect to human rights. This training was originally developed for and is required to be completed by medium and high risk suppliers which do not have their own compliance and/or third-party risk management programs in place. The supplier training also includes a quiz and certification. The EcoVadis platform also includes training modules (EcoVadis Academy) in several areas, including, for example, a course on child and forced labour prevention. Enbridge may, as part of a performance management plan for suppliers assessed as medium and high risk, request that they complete specified training through EcoVadis.

Upon the Act receiving Royal Assent in May 2023, Enbridge management convened an internal working group to examine our current practices and to enhance our existing governance framework to manage modern slavery risks within our business and supply chains. Management discussed the Act and its requirements with the Enbridge Board of Directors and applicable committees, and senior management in each of our business units were engaged in discussions about our broader human rights policies and processes. We have provided training to our Supply Chain Management personnel on the risks of forced and child labour in our supply chains and are developing further training to deploy in 2024.

Assessing effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains

Our ability to operate and ensure long-term success is linked to how well we identify and manage potential risks to our Company – including the risk of forced labour or child labour being used in our business and supply chains. Assessing the effectiveness of managing that risk is a shared responsibility of our Board of Directors (Board) and management.

The Board is responsible for identifying and understanding the Company's principal risks and ensuring that appropriate systems are implemented to monitor, manage and mitigate those risks. Each year, management prepares and provides to the Board and its committees a Corporate Risk Assessment (CRA), which analyzes and prioritizes enterprise-wide risks, highlighting top risks and trends. We assess and rank risks based on impact and probability, and strive to ensure mitigation measures are appropriately designed, prioritized, resourced and effective. Our proactive risk management approach informs our Company strategy and operations. It also helps ensure that emerging risks are identified early so that we are ready and able to manage them as they materialize. To better identify, manage and mitigate risk, the CRA report is reviewed by the Board committee with responsibility for the risk category relevant to their mandate. Given the nature of our business (focused on transportation as opposed to the production of goods), forced labour or child labour

in our supply chains has not, to date, been identified as a material risk in our CRA. However, in the event that an issue arises that causes this risk to be elevated, it would fall under the mandate of the appropriate committee, which may include the Sustainability Committee, which has oversight of human rights matters. The Committee may make recommendations to the Board in respect of Company practices. In addition, the Board committees may authorize the implementation of systems that address risks within the scope of their responsibility and monitor them to ensure they remain effective. Management provides regular reports to the Board at each quarterly meeting to review our top risks, identify trends and help manage risk.

Within our management structure, accountability for human rights generally, and prevention and mitigation and forced labour or child labour in our supply chains in particular, is shared primarily amongst our Supply Chain Management, Ethics & Compliance and Sustainability functions. Our Chief Sustainability Officer is responsible for the development and implementation of our sustainability strategy and policies and ensures our sustainability strategy, including protection of human rights, is embedded into our business. Our Chief Compliance Officer is responsible for company-wide oversight of our overall state of compliance and for enhancing our culture of ethics and integrity.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that the Board of Directors of Enbridge Inc. has reviewed the information contained in the report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Pamela L. Carter
Chair, on behalf of the Board of Directors of Enbridge Inc.

February 7, 2024



Contact us

If you have any inquiries concerning the 2024 Fighting against forced labour and child labour in supply chains report, please contact sustainability@enbridge.com.

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