



## Business Ethics

Enbridge and our stakeholders are well served by the values we work and live by—safety, integrity and respect. These values support the communities we serve, the environment around us and each other.

Enbridge's values are reflected in our actions, our decisions and our interactions at every level, and are expectations of each employee, officer, director and those working on our behalf. Our reputation for acting with integrity is the foundation of positive, productive and trusting relationships—with customers, investors, communities and business partners. And that foundation of trust begins within our organization and amongst colleagues. Employees must feel free to express concerns, without fear of retaliation. And they must feel confident that the issues they raise are taken seriously and respected.



### Business Conduct

Our intent is always to comply with all legal and regulatory requirements, including those pertaining to employment practices and business conduct. We take steps to ensure that our employees conduct themselves ethically in business dealings, and we are committed to preventing all forms of corruption within the scope of our business and operations. Enbridge [Statement on Business Conduct](#) is available on our website.

### Ethics and Compliance Program

Our Ethics and Compliance Program is designed to minimize, to the extent possible, incidences of non-compliance and to ensure that our employees and contract workers conduct their work ethically, legally and responsibly. It is also intended to: emphasize the positive impact of ethical behavior on our corporate reputation, operations and financial performance; provide internal consistency in the application of compliance and ethical standards; and demonstrate our commitment to corporate social responsibility. The program establishes the accountabilities and responsibilities for our personnel, and addresses internal investigations, audits, self-reporting and discipline. As part of the program, we routinely manage compliance and take steps to improve our ethics and compliance culture through adherence to established policies and procedures.

### Ethics and Compliance Oversight

The oversight of our Ethics and Compliance Program is a shared responsibility of the Audit, Finance and Risk Committee of our Board of Directors, our Chief Compliance Officer and our Executive Leadership Team.

### Supporting Policies

Our values and governance structure are further supported by a range of policies on such wide-ranging topics as expectations of suppliers, government relations and political contributions, intellectual property, accounting and financial reporting, and more. These policies can be viewed at [enbridge.com](http://enbridge.com).

## Roles and Responsibilities



### Employee Training

In 2018, Ethics and Compliance Department personnel provided in-person training, awareness sessions and presentations on compliance-related issues to hundreds of employees and contract workers. Topics covered included anti-corruption and bribery, anti-trust issues and prevention of privacy breaches—all with the goal of raising awareness and preventing incidences.

Our recently expanded privacy team provides advice on data privacy issues and works with cross-functional business partners to ensure awareness and effective management of emerging privacy risks within the organization.

Annually, as a condition of employment, employees and contract workers are required to complete an online Statement on Business Conduct training course, which addresses an array of content, including anti-bribery and anti-corruption. The online training requires employees to certify their compliance with our Statement on Business Conduct during the previous calendar year and disclose any actual or potential

conflicts of interest. In addition to online training delivered through the Statement on Business Conduct, throughout 2019 anti-bribery and anti-corruption in-person training sessions will be conducted.

### Reporting Allegations of Non-Compliance

We want to know of all potential non-compliance concerns so we can address them appropriately, gain insight and understanding, and continually improve.

Anyone can report potential breaches of the Statement on Business Conduct, Enbridge policies or the law via email, phone, in-person, mail, or the Ethics Helpline, which is operated by a third-party service provider. Our service provider delivers each report directly to our Chief Compliance Officer and to our Associate General Counsel, Ethics and Compliance. Individuals who use the Helpline may choose to identify themselves or remain anonymous. The reports are reviewed to address and resolve issues raised and confirmed as breaches with our policies or with the law.

## SPOTLIGHT :

### Enbridge Ethics Helpline

Enbridge believes in fostering and facilitating a “speak-up” culture.

While our Ethics and Conduct Hotline has been an excellent tool in encouraging the anonymous reporting of ethical and compliance concerns, employee feedback and reporting advances prompted a new partnership in 2019 with an independent third-party vendor, Convercent, hosting a new Ethics Helpline.

The Ethics Helpline is a modern, confidential platform that facilitates reporting of potentially illegal, unethical or improper conduct at Enbridge. It also allows employees and stakeholders to ask questions regarding the application of the Company's many governing policies. The new helpline offers enhanced functionality as well, providing flexible and innovative reporting methods, including 24/7 Helpline access via telephone, web submission and mobile texting.

## Our Performance

In 2018, we received a total of 122 reports, down from 140 reports in 2017. There was also a decrease in the percentage of in-person, mail and phone reports and an increase in the percentage of reports received via email and the Ethics and Conduct Hotline. Anonymous reporting represented 61% of all reports, compared to 64% in 2017.

We received reports that contained multiple allegations. The 122 reports we received contained a total of 159 allegations, a ratio of 1.30, which is a decrease compared with the 2017 ratio of 1.70.

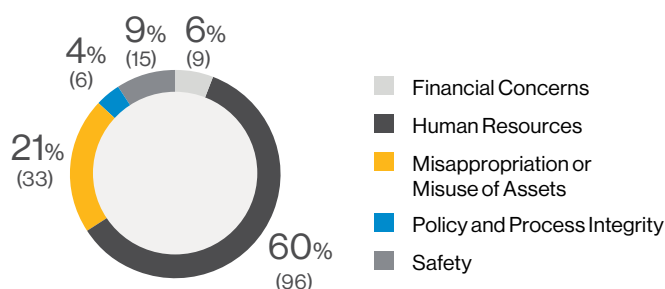
### Fines, Penalties and Violations

Our intention is to work according to all external regulations and laws to prevent fines, penalties and violations that are monetary or non-monetary in nature. We are reporting all fines, penalties and violations (monetary and non-monetary) in excess of C\$10,000 and US\$10,000 (depending on the country in which they occurred). In 2018, we remitted the following fines, penalties and violations:

#### U.S. Department of Transportation (DOT): Pipeline and Hazardous Materials Safety Administration (PHMSA)

- In January 2018, Enbridge paid the U.S. DOT a civil penalty of US\$65,500 concerning a Notice of Probable Violation and Proposed Civil Penalty (Notice) issued in December 2015 to Algonquin Gas Transmission, LLC, a subsidiary of Spectra Energy Partners, LP. Notice included proposed findings of failing to take prompt remedial action to correct deficiencies indicated by cathodic protection monitoring at nine sites and failing to inspect three locations of pipeline exposed to atmosphere within maximum interval.
- In October 2018, Enbridge paid the U.S. DOT a civil penalty of US\$36,200 as a result of a Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order (Notice) issued June 2017 to Algonquin Gas Transmission LLC, a subsidiary of Spectra Energy Partners. Notice indicated a probable violation of the requirement of compressor station emergency shutdown systems to be operable from at least two locations, each of which is to be near the exit gates or emergency exits.
- In October 2018, Enbridge paid the U.S. DOT a civil penalty of US\$35,500 as a result of a Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order (Notice) issued July 25, 2017 to Vector Pipeline LP (a joint pipeline venture of Enbridge Inc., and DTE Energy Company, which is operated by Enbridge). Notice indicated a probable violation of the requirement to take prompt remediation to correct deficiencies in cathodic protection levels, and a violation of the requirement to conduct a review of work conducted by Vector personnel to determine the adequacy and effectiveness of procedures for normal operation and maintenance.

## Ethics Reports by Category



#### U.S. District Court for the Western District of Michigan, Southern Division

- In May 2018, without admission of liability to the alleged violations, Enbridge paid the U.S. Department of Justice a penalty of US\$1,863,000 concerning alleged failure to provide timely in-line inspections on certain Enbridge pipelines in accordance with the provisions of the May 2017 court-approved Consent Decree.