

# Supplier Code of Conduct

## Introduction

At Enbridge, our purpose is to fuel people's quality of life, and our mission is to be the first-choice energy delivery company in North America and beyond for all our stakeholders.

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. That is why, we work with Suppliers (those organizations that provide materials, goods, and/or services to Enbridge, including contractors, subcontractors, vendors, and consultants) who strive to be sustainable leaders in their industries; are willing to uphold our core values; adhere to our fundamental policies and procedures and this Supplier Code of Conduct (Code); and share our commitment to the highest standard of business conduct.

The Code is the foundation of our relationship with our suppliers - creating a mutual understanding of our company's core values and beliefs. The purpose of the Code is to outline our expectations according to law and our company's core values and beliefs—ensuring consistent compliance from all of our suppliers.

## Ethics & compliance

In all their activities, our Suppliers must conduct business in full compliance with the ethical standards set out in this Code, as well as the letter and intent of all laws, rules, and regulations of the countries in which they operate, or generally accepted international standards. Suppliers are also encouraged to go beyond legal compliance, to advance social and environmental responsibilities. When the country's laws and international standards address the same issues, we expect the highest standards to be applied.

Suppliers are also required to take all reasonable measures to ensure they respect, uphold, and communicate this Code across their business and within their own supply chains connected with the Suppliers' contracts with Enbridge.

## Verification

We require our Suppliers to maintain documentation to verify compliance with the Code and applicable laws and regulations.

## Risk Assessment and Management

We expect our Suppliers to develop and maintain processes that identify risks in all areas addressed in this Code; assess the significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.

## Health and safety

Achieving best-in-class safety performance has been and continues to be Enbridge's stated priority. Our commitment to safety is based on caring for employees, our contractors, the communities where we live and work, and the environment. Our target is to achieve zero incidents and to foster a culture in which safety is everyone's responsibility, continuous improvement is required, hazards are controlled, and our commitment to caring extends beyond the workday.

We require our Suppliers to operate in alignment with our commitment to safety and to do their part to help us achieve best-in-class safety performance.

## Environment

Enbridge is committed to sound stewardship and protection of the environment. We require our Suppliers to comply with all applicable laws and regulations and Enbridge environmental policies and guidelines as a condition of conducting business with and on behalf of Enbridge. Suppliers are also encouraged to apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint.

Our approach to the environment is governed by our [Sustainability](#) and [Climate Policy](#). We require our Suppliers to be familiar with and contribute to these commitments.

## Labor and human rights

Enbridge believes that everyone with whom we come in contact deserves to be treated fairly, honestly, and with dignity. We do not condone any form of harassment, discrimination, or inappropriate actions or language of any kind. Suppliers must conduct all their operations in a socially responsible, non-discriminatory manner and in full compliance with all applicable laws. Suppliers must respect the human rights of workers and treat them with dignity and respect as understood by the international community.

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## Forced labor and anti-slavery

Suppliers must not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities.

Suppliers must not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary, and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government issued identification, passports, or work permits as a condition of employment.

Suppliers must ensure that third-party agencies providing workers are compliant with the provisions of this Code and the laws of the sending and receiving countries, whichever is more stringent in its protection of workers. Suppliers should ensure that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker.

## Child labor

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 allowed to carry out light work that 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 the employee's physical or mental development.

## Equal opportunity rights (adopt non-discriminatory practices)

Enbridge does not tolerate harassment or discrimination based on prohibited grounds. We require our Suppliers to provide a workplace that is inclusive and free of harassment and unlawful discrimination.

## Wages and benefits

Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Where no wage law exists, workers must be paid at least the minimum local industry standard.

## Freedom of association and collective bargaining

We require our Suppliers to respect the rights of workers to freely join labor unions, seek representation and join workers' councils in accordance with local laws, and to bargain collectively.

## Indigenous peoples and inclusive suppliers

A strong, broad, and inclusive supplier community is essential to the resilience in our supply chain and drives innovation. It also enhances the vitality of our business and the communities where we live and work. We seek opportunities to conduct business with competitive, certified inclusive suppliers and Indigenous businesses, as described in our [Indigenous Peoples Policy](#) and Responsible Procurement Policy.

We encourage Suppliers to work cooperatively with Enbridge-identified certified inclusive suppliers and to develop and utilize certified inclusive suppliers of their own while performing work on our behalf.

Suppliers may be required to report to Enbridge on a regular basis the amount of spend with qualified inclusive certified companies that can be contributed as part of purchases made by Enbridge.

## Supporting our communities

Enbridge believes in supporting and investing in the communities where our employees live and work. As a part of our continuing commitment to these communities, we encourage Suppliers to promote development of sub-suppliers through capacity building by developing and strengthening skills and abilities and providing resources that communities, organizations, and people need. This approach both stimulates local economic development and creates long-lasting benefits to communities.

# Ethical business dealings

## Business integrity

We require our Suppliers: (i) to maintain the highest standards of corporate ethics and integrity; (ii) to comply with all applicable federal, provincial, state, and local laws, regulations, and procedures; and (iii) to comply with this Code and any other policies and procedures communicated by Enbridge.

## Conflict of interest

A conflict of interest exists any time there is a conflict between a personal interest (financial or otherwise) and the interests of Enbridge. Suppliers, their employees, or their families cannot receive improper benefits through the relationship with Enbridge or allow other activities to interfere with acting in the best interests of Enbridge. A conflict may arise with Suppliers that employ or are partially or fully controlled by an Enbridge employee or family member.

All and any conflict of interest in any business dealing with Enbridge, of which the Supplier is aware, must be declared to your Enbridge representative and Enbridge's [Ethics & Compliance department](#) to allow Enbridge the opportunity to take appropriate action.

## **Anti-bribery and anti-corruption**

Suppliers must never offer or accept improper payments, inappropriate gifts, or anything of value, directly or indirectly, that could influence a business decision or gain an advantage in business. Any form of bribery, corruption, kickbacks, or extortion is prohibited. Enbridge further does not permit the making of facilitation (or grease) payments to secure or expedite routine government actions.

Payments to public officials (federal, provincial, municipal, or Indigenous) are of particular concern. Suppliers dealing with public officials on Enbridge's behalf must exercise caution not to provide such public officials with anything of value that could be construed as a bribe or to create a perception of bribery.

## **Financial crimes**

Suppliers must not engage, directly or indirectly, in any form of accepting, concealing, converting, and/or transferring funds obtained from criminal activities. Any form of money laundering, embezzlement, terrorist financing, facilitation of tax evasion, fraud or falsification is prohibited.

## **Fair competition and anti-trust legislation**

Suppliers must comply with all applicable Canadian, United States, or other foreign competition and antitrust legislation.

# **Responsible business behavior**

## **Responsible sourcing**

Suppliers must ensure that materials used in the products they supply do not contain conflict resources such as metals derived from minerals that originated from a conflict region that directly or indirectly benefits armed groups.

Responsible sourcing also includes managing supply chains to ensure products supplied to Enbridge and the materials and parts used to manufacture such products are not sourced using child or forced labor, that sub-contractors will not put Enbridge at risk of bribery and corruption, that third parties used by Suppliers are not subject to sanctions, and that they will not put Enbridge at risk of cyber-attacks or privacy breaches.

## **Timely, accurate and complete business records**

Suppliers must maintain reasonable, complete, and accurate books and records, including producing timely, accurate, and complete business records for all Enbridge transactions. This includes preparing accurate invoices and other financial records that are in accordance with professional accounting standards, applicable legal requirements and contractual terms and obligations. When submitting business records to Enbridge, compliance with reporting standards as set by regional regulators must also be taken into account.

Suppliers must create, retain, and dispose of business records in full accordance with applicable legal and contractual requirements. Enbridge reserves the right from time to time to monitor Supplier records as they pertain to work being performed for Enbridge.

## **Confidentiality and privacy**

Unless disclosure is authorized or legally mandated (for example by court order), we require our Suppliers to protect the confidentiality of employee and customer information in compliance with applicable privacy legislation, irrespective of whether the information and data was provided by the employee or customer, or was created by the Supplier. Suppliers should consider all non-public information to be confidential. Buying and selling securities based on material non-public information, as well as sharing non-public information is prohibited and could result in serious civil and criminal penalties.

## **Third-party risk management**

Suppliers must have a third-party risk management program in place for onboarding and monitoring their suppliers to mitigate third-party risk in relation to sanctions, anti-bribery and anti-corruption laws, human rights laws and fair labor standards, data protection laws and adherence to privacy and cybersecurity best practices. Suppliers must implement a risk-based approach, conducting due diligence in respect of, and imposing controls, including contractual obligations, in respect of those of their Suppliers that present a risk of non-compliance with the law, ethical standards or this Code. In supplying Enbridge with materials, goods, or services, we require that our Suppliers not use third parties that are known to violate the standards set out in this Code.

## **Sanctions and embargoes**

International trade laws prohibit or restrict trade with certain countries that are subject to embargoes or sanctions, as well as with certain individuals and organizations (e.g., entities that have ties to actual or suspected terrorists or drug traffickers).

All and any instances of the Supplier, any of its affiliates or any of their directors, officers or employees appearing on an individual, organizational or country sanction or embargo list must be declared to Enbridge to allow Enbridge the opportunity to take appropriate action prior to entering into and during any business transaction.

## **Competitive protocol**

Enbridge requires all Suppliers to engage in the highest ethical standards during the sourcing process. Any competitive bidding-related initiative, including the Request for Proposal (RFP), Request for Information (RFI) or Request for Quotes (RFQ), ("RFx") is both confidential and proprietary to Enbridge. Suppliers must not reference the initiative in any publicity without prior written consent from Enbridge.

The point of contact stated in the RFx is the sole point of contact for any matter related to the RFx. Suppliers must not contact any other person at Enbridge regarding that specific initiative, nor should the RFx be discussed with any other Enbridge employee.

Suppliers must refrain from discussing or disclosing their pricing, costs, and any other contract terms with their competitors at any time and especially during a competitive bidding process and an active contract term.

## Product safety and quality

Suppliers will meet or exceed applicable laws and regulations as well as contractually agreed quality requirements that meet Enbridge's needs, perform as warranted, and are safe for their intended use. Suppliers must develop and maintain processes to detect counterfeit parts and materials and exclude them from products that Enbridge purchases.

## Enbridge resources

Enbridge's resources include, among other things, property, assets, intellectual property, and confidential information.

Suppliers are responsible for safeguarding our resources used while performing their work and must make every effort to protect all our resources. These resources must only be used for legitimate business purposes to advance the interests of Enbridge. The personal use of Enbridge resources without prior written permission is prohibited.

The intellectual property rights of Enbridge and third parties with whom we work must always be honored. Suppliers are obligated to inform Enbridge of any situation that may constitute a violation of our property rights.

## Brand and trademarks

We require Suppliers who interact with our customers to always conduct themselves in ways that reinforce and strengthen the Enbridge brand.

Supplier's use of Enbridge's brand is not permitted without the express written permission of the [Public Affairs and Communications](#) department at Enbridge. Under no circumstances are third parties allowed to display the brand of Enbridge or any of its affiliated businesses.

## Artificial Intelligence

As Enbridge and its Suppliers integrate Artificial Intelligence (AI) into our operational framework, we require our Suppliers to uphold high standards and comply with the requirements and responsibilities when developing, deploying, and using AI systems. These requirements outlined in Enbridge's Artificial Intelligence Policy are designed to ensure that the development, deployment, and use of AI technologies are used ethically, responsibly, and in a manner that aligns with our company's core values of safety, integrity, respect, inclusion, and high performance. Suppliers are required to be familiar with and always comply with our Artificial Intelligence Policy and may also be required to demonstrate their responsible use of AI in service of Enbridge.

## Management system

We require our Suppliers to have in place the appropriate control measures in their own operations and across their supply chain to monitor compliance with this Code and to promptly correct any non-compliance. Suppliers shall maintain policies and practices to allow violations, misconduct, or grievances to be reported by workers and addressed without fear of retaliation.

# Reporting non-compliance

Suppliers, their employees, or their sub-suppliers must report any actual, potential or suspected fraudulent financial reporting, misappropriation of assets, corruption and other fraud-related malfeasance, illegal activity, fiscal waste or abuse, safety or operational issues, misconduct, or violations of laws, regulations, internal policies or procedures or other suspected violations of this Code or the [Statement on Business Conduct](#) by any party.

To report actual, potential, or suspected misconduct or violations of this Code, contact Enbridge Supply Chain Management at [scoc@enbridge.com](mailto:scoc@enbridge.com).

## Ethics Helpline

**Independent. Confidential. Anonymous.**

When suppliers, their employees, or their sub-suppliers are not comfortable reporting issues using internal communication channels, then the Ethics Helpline is always available.

The Ethics Helpline is operated by a third-party, and it provides a mechanism where reporting is safe, confidential and can be anonymous.

Contact the Ethics Helpline at [enbridgeethicshelpline.com](http://enbridgeethicshelpline.com) or by calling 1-866-571-4989.

## Non-retaliation

Suppliers, their employees, or their sub-suppliers who make reports in good faith will be protected from any form of retaliation. Enbridge investigates all reports of violations or suspected violations of this Code and the [Statement on Business Conduct](#) promptly, fairly and in accordance with our legal responsibilities.

# Penalties for Noncompliance

We have the right, in accordance with contractual terms, to terminate our business relationship with a Supplier that fails to adhere to the Code.

# Audits and Inspection

We can audit Suppliers in accordance with contractual terms to ensure compliance with the standards in this Code. Any location where a Supplier or sub-supplier does work for Enbridge can be inspected as part of this process. If permission to conduct an audit is denied, we may take action in accordance with contractual terms, including termination of our contractual relationship.

# Questions

We encourage Suppliers or individuals with concerns or questions about this Code to discuss them with their Supply Chain Management representative or to contact us at [scoc@enbridge.com](mailto:scoc@enbridge.com).