

# Supplier Code of Conduct

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## Introduction

At Enbridge, we deliver the energy that North Americans rely on each day, and it is our responsibility to make decisions and conduct our business in a responsible, honest, and ethical manner. To that end, 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 leaders in their industries; are willing to uphold our core values of safety, integrity, inclusion and respect; adhere to our fundamental policies and procedures and this *Supplier Code of Conduct*; and share our commitment to the highest standard of business conduct.

This Code outlines Enbridge's requirements regarding the ethical standards and business conduct of its Suppliers.

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. In particular, Suppliers must comply with laws and standards related to health and safety, environment, fair labor practices (e.g. conventions defined by the International Labour Organization), human rights (including prohibitions on human trafficking and any form of forced labor), bribery and corruption, money laundering, terrorist financing, facilitation of tax evasion and other prohibited business practices as well as government sanctions. Suppliers are encouraged to go beyond legal compliance, in order 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 entire business enterprise and within their own supply chains.

## 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.

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

## Labor and human rights

Enbridge believes that each individual 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.

## Employment Practices

Suppliers shall 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 shall 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 shall 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 shall 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)**

We require our Suppliers to provide a workplace that is inclusive and free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or civil status in hiring and employment practices such as promotions, rewards, and access to training.

### **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.

### **Supplier Diversity and Indigenous Peoples**

We recognize that a strong, diverse supplier community is essential to economic vitality, and we seek opportunities to conduct business with competitive, diverse suppliers and Indigenous businesses, as described in our [Supplier Diversity Policy](#) and [Indigenous Peoples Policy](#). This provides economic impact and supports the communities in which we live and work.

Enbridge defines a "Diverse" supplier as a Supplier that is at least fifty-one percent (51%) owned, managed, and controlled by a diverse person or group with U.S. or Canadian citizenship, and certified by a nationally- or regionally-recognized third party as one or more of these classifications: minority-owned, woman-owned, LGBTQ-owned, disability-owned, veteran-owned, and/or small business suppliers. Supplier diversity encourages the use of diverse suppliers and Indigenous businesses throughout the supply chain, providing an equal opportunity for qualified companies to earn Enbridge business.

We encourage Suppliers to work cooperatively with Enbridge-identified diverse suppliers and to develop and utilize diverse 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 diverse companies that can be contributed as part of purchases made by Enbridge.

### **Social Performance**

Enbridge believes in supporting and investing in the communities where our employees live and work. As a part of our continuing commitment in 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.

## **Responsible business behavior**

### **Business Integrity**

We require our Suppliers to maintain the highest standards of corporate ethics and integrity and to comply with all applicable federal, provincial, state, and local laws, regulations, and procedures. Any form of bribery, corruption, extortion, embezzlement, money laundering, terrorist financing, facilitation of tax evasion, fraud or falsifications is prohibited.

### **Timely, Accurate and Complete Business Records**

Suppliers are required to 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.

### **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 their obligation to act 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 Enbridge to allow Enbridge the opportunity to take appropriate action prior to entering into any business transaction. Any ownership of beneficial interest in a Supplier's business by a government official, representative of a political party, or an Enbridge employee must be declared to Enbridge prior to entering into any business relationship with Enbridge.

### **No Improper Advantage**

Suppliers shall not offer or solicit any gifts, gratuities, entertainment, payments of cash, loans, or any other kind of undue favor or use other inappropriate means of influence, or appear to influence, a business decision or gain competitive advantage.

### **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, 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 that involves 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**

We require Suppliers to 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 & anti-corruption, human rights and fair labor standards, data protection laws and adherence to privacy & 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.

### **Fair Competition and Anti-Trust Legislation**

We require our Suppliers to comply with all applicable Canadian, United States, or other foreign competition and antitrust legislation.

### **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.

### **Responsible Sourcing**

We require our Suppliers to 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.

### **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 in the course of 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 be honored at all times. 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 conduct themselves at all times in ways that reinforce and strengthen the Enbridge brand.

Supplier's use of Enbridge's brand is not permitted without 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.

## Reporting

Suppliers, their employees, or their sub-suppliers must report any fraudulent financial reporting, misappropriation of assets, corruption and other fraud-related malfeasance, illegal activity, fiscal waste or abuse, or other suspected violations of this *Supplier Code of Conduct* by any party.

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

## 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.

## 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).

## Statement on Business Conduct

Enbridge's [Statement on Business Conduct](#) guides our enterprise's behavior and standards. Suspected violations to the [Statement on Business Conduct](#) must be reported to Enbridge's Ethics and Conduct Hotline at 1-866-571-4989 or [enbridgehotline.com](http://enbridgehotline.com), which are operated by a third party and protected by Enbridge's [Whistleblower Policy](#).