

Enbridge Inc. Political Contributions Policy

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Applicability: **Applies to Enterprise**
Originator: **Public Affairs, Communications and Sustainability**
Approval: **February 2022**
Effective Date: **February 2022**

Our political engagement philosophy

Enbridge believes it is important that all stakeholders engage constructively in the political process and we participate at the federal, state, provincial and local levels to help inform the development of public policies which may affect our industry, our company, our employees and our stakeholders. Enbridge is committed to the highest standard of ethical conduct in our involvement in the political process, adhering to all applicable laws and regulations in Canada and the United States and Our Statement on Business Conduct. Our participation in the political process, including support of political candidates and campaign, is also guided by our company values of safety, integrity, respect and inclusion.

Personal political participation

Enbridge supports individual employee participation in the political process in our communities, including involvement with political parties, candidates or on public policy issues. Individual employee participation in the political process must comply with the Statement on Business Conduct and all applicable laws and regulations. Enbridge provides information on its political activities and shares its viewpoint on issues affecting the company with employees, customers and the general public. We respect anyone's right to disagree with the official company positions.

Enbridge (U.S.) Inc. Political Action Committee (Enbridge PAC)

In the United States, eligible U.S.¹ Enbridge employees may choose to participate in the political process by voluntarily making contributions to the Enbridge (U.S.) Inc. Political Action Committee ("Enbridge PAC"), a political action committee that is not affiliated with any political party, candidate or

organization. The Enbridge PAC was established by Enbridge (U.S.) Inc. (a U.S. company² that is a subsidiary of Enbridge Inc.). Enbridge PAC is directed by a board of trustees comprised entirely of eligible U.S. employees, which makes all decisions regarding the PAC's political contributions. Enbridge PAC contributions go directly to support candidates for Congressional office and for state office, where Federal PAC contributions are permitted by state law. Contributions to certain national party organizations may also be made as appropriate. All PAC contributions are disclosed consistent with Federal and state laws and regulations, and are disclosed on the website of the U.S. **Federal Election Commission** and on the websites of election and campaign finance authorities in the certain states where the PAC makes contributions.

Corporate contributions

Federal laws in both Canada and the United States generally place limits on a company's ability to participate in the political process. As such, Enbridge does not contribute corporate funds directly to federal political candidates, committees or parties in either jurisdiction. However, on a limited basis, U.S. companies that are subsidiaries of Enbridge Inc may use corporate funds in the United States, generated from U.S. operations to make contributions to eligible organizations created under section 527 of the Internal Revenue Code.

States and provinces where Enbridge does business have different laws and regulations governing political contributions in state, provincial and local elections. Enbridge participates in the political process in accordance with all state, provincial and local laws and regulations, and any and all corporate

¹ For purposes of this policy, references to "eligible U.S." means a U.S. citizen or U.S. permanent resident.

² For purposes of this policy, references to "U.S. company" means a legal entity formed under the laws of a U.S. state.

contributions shall comply with all applicable laws and regulations. In the United States corporate political contributions are made only by Enbridge U.S. Inc. or U.S. companies that are other subsidiaries from funds generated by the operations of such U.S. subsidiaries and decisions regarding such contributions are made by Enbridge U.S. Inc senior leaders who are U.S. citizens.

Our political contribution decisions are guided by our company values of safety, integrity, respect and inclusion; and what is in the best interest of the company, our employees and our shareholders. All proposed contributions that Enbridge makes must be reviewed and approved by the senior leader responsible for Public Affairs, Communications and Sustainability, Business Unit President, the Chief Executive Officer or Board of Directors. In addition, for contributions in the U.S. Enbridge's senior leader responsible for External Affairs in the United States must review and approve all contributions in the United States and ensure accountability to this policy. A record of all approved contributions will be maintained by Public Affairs, Communications and Sustainability. Enbridge's total annual corporate political contributions in Canada and the United States can be found in our annual Sustainability Report.

Lobbying

Enbridge actively participates in the political process to help inform the development of public policies important to our business objectives, our employees, our industry, and other key stakeholders. Enbridge employs and engages registered lobbyists in Canada and the United States to support its legislative and regulatory activities. These lobbyists are carefully selected, expected to act with the highest integrity and engaged only with the approval of our senior business unit government affairs officer or Enbridge's senior leader responsible for External Affairs in Canada and/or the United States.

Public disclosure

Enbridge and its lobbyists are required to file lobbying reports with the Government of Canada, the U.S. Congress, and state and provincial and certain municipal agencies on a regular basis disclosing information about lobbying activities. The reports include information on the issues lobbied, the agencies contacted and the expenditures made, and are available for public review in the United States and Canada on the websites noted below. In many cases, state and provincial reports are made available for review on the applicable state or provincial agency website.

In the U.S., Enbridge maintains and files Lobbying Disclosure Act reports (Form LD-2) with the U.S. Congress. These reports detail the particular bills and issues on which individual lobbyists had activity, as well as the total lobbying expenses incurred during each calendar quarter. Lobbying reports may be found at: disclosurespreview.house.gov and soprweb.senate.gov/index.cfm?event=selectfields.

In the U.S., Enbridge and its registered federal lobbyists must also file semi-annual reports detailing, among other things, Enbridge PAC disbursements and personal contributions to federal candidates. These reports (LD-203) are viewable at: disclosurespreview.house.gov and <https://lda.senate.gov/system/public/>.

In Canada, with respect to the federal government Enbridge's registered consultants and in-house lobbyists must file monthly reports detailing communications with designated public office holders. These forms are publically available at: <https://lobbycanada.gc.ca/en/>.

Trade associations

Enbridge also has a voice on federal, provincial, state and local issues through our participation in trade associations. Enbridge is committed to supporting the development of responsible public policy in the energy infrastructure industry and we work with various trade associations on a variety of public policy issues that may impact our businesses. We may not align with or support every policy decision each of these associations makes, however we do advocate our position. Our annual Sustainability Report lists the trade organizations to which we contributed more than C\$50,000 and US\$50,000 in membership dues.

Governance

The Sustainability Committee of the Board of Directors provides oversight on Enbridge's political contributions including approval of the Political Contributions Policy. Management provides The Committee with updates on political contributions which are also publicly disclosed annually in Enbridge's Sustainability Report.