

Canadian Affiliate Relationship Code

Canada Liquids Pipelines

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1. Definitions

Enbridge CER Pipelines: CER-regulated companies holding authorizations to construct and operate oil pipelines.

Pipeline Affiliates: Provincially regulated companies holding authorizations to construct and operate oil pipelines.

Marketing Affiliates: Any company that arranges for pipeline transportation of a shipper's product; negotiates agreements with pipelines on behalf of a shipper company; and/or markets crude oil or petroleum products.

2. Purpose and Application

This Affiliate Relationship Code ("**Code**") governs the relationships between Enbridge CER Pipelines, as well as the relationship between Enbridge CER Pipelines and their Pipeline Affiliates and Marketing Affiliates (collectively "**Enbridge Affiliates**"). If there is any question as to whether this Code applies to an Enbridge entity, please contact the Ethics and Compliance Office for Canada.

This Code applies to all employees (including officers, directors, and all full-time and part-time employees) and contract workers, independent consultants, representatives, and agents (collectively "**Employees**") of Enbridge CER Pipelines and Enbridge Affiliates.

This Code is designed to ensure that:

- interactions between Enbridge CER Pipelines and Enbridge Affiliates do not result in preferential treatment of Enbridge Affiliates.
- inter-affiliate interactions do not result in the sharing of Confidential Shipper Information with any other shippers, especially Marketing Affiliates.
- Enbridge CER Pipelines and their Employees operate independently from Marketing Affiliates and their Employees.
- inter-affiliate interactions do not result in cross-subsidization either between Enbridge CER Pipelines and Enbridge Affiliates, or amongst the Enbridge CER Pipelines.

Enbridge is committed to conducting business in a socially responsible, legally compliant, and ethical manner in accordance with a core set of corporate values. Key components of the Enbridge corporate values include operating with integrity, honesty, and respect in all its dealings with stakeholders. As part of this, Enbridge is committed to the efficient functioning of energy markets, including open, transparent, and efficient markets, free from discrimination and manipulation.

The CER has oversight over Enbridge CER Pipelines regarding financial regulatory matters, including ensuring that there is no unjust discrimination in tolls, service, or facilities.

3. Employee Responsibilities

It is each Employee's responsibility to comply with the Code and applicable regulations while performing their job in a safe manner. You must:

- read and understand the Code.
- understand whether your role is:
 - actively engaged in transmission functions (as described in Section 7), making you a "Transmission Function Employee"
 - actively engaged in marketing functions (as described in Section 7), making you a "Marketing Function Employee"
 - or other.
- ask questions if the Code or applicable regulations are unclear.
- follow the law and the Code at all times; and
- notify the Enbridge Ethics and Compliance Office for Canada if you have reason to believe there has been a potential violation of the Code, Enbridge's compliance policies or applicable regulations.

4. Management Responsibilities

Although it is the responsibility of all Employees to understand the Code, managers, people leaders and officers (collectively “**Managers**”) have increased responsibility within Enbridge for establishing a culture of compliance. Managers must:

- be role models when it comes to compliant behavior and lead by example in their words and actions.
- ensure that Employees understand the regulatory environment in which the Enbridge CER Pipelines operate and provide the necessary resources to comply with the law and report non-compliant behavior.

In no case shall a Manager request or instruct any Employee to violate the Code or applicable regulations or take any adverse employment action against an Employee for refusing to do so.

5. No Preferential Treatment

In the administration of any Enbridge CER Pipeline’s tariff, contracts, and operations, including the provision of information in a timely manner to all customers, Enbridge CER Pipelines will not unduly discriminate between customers and will not treat Marketing Affiliates better than other shippers on the pipeline. The CER Act specifically dictates that a company shall not make any unjust discrimination in tolls, service or facilities against any person or locality. As such:

- No shippers, and in particular, no Affiliated Shippers shall have preferential access to Enbridge CER Pipelines’ material non-public transportation information including, but not limited to, future tariff changes, future expansions, connections, reversals, addition or removal of origins or destinations, segmented costs and revenues and anything else that would advantage a shipper if disclosed selectively.
- Enbridge CER Pipelines shall not condition or otherwise require any customer to deal with other Enbridge CER Pipelines or Enbridge Affiliates in order to receive transportation services. Further, CER Enbridge Pipelines shall not explicitly or implicitly suggest that a customer may receive an inappropriate advantage if that customer also deals with any other CER Enbridge Pipelines or Enbridge Affiliate.

6. Confidential Shipper and Pipeline Information

“**Confidential Shipper Information**” means information regarding the nature, kind, quantity, destination, consignee, routing and shipper of product tendered to Enbridge CER Pipelines which information may be used to the detriment or prejudice of such shipper or consignee or may improperly disclose the shipper or consignee’s business transactions to a competitor.

“**Confidential Pipeline Information**” means non-public transportation information including, but not limited to, forecast pipeline in-service dates, pipeline outages, and apportionment of Enbridge CER Pipelines.

- Without express written consent, Transmission Function Employees shall not disclose Confidential Shipper Information to any other shipper, especially an Affiliated Shipper or use another person as a conduit to make such disclosure.
- Marketing Function Employees shall not directly or indirectly solicit Confidential Pipeline Information or Confidential Shipper Information from Enbridge CER Pipelines or their Employees or use another person as a conduit to obtain such information.
- If a Marketing Function Employee comes into possession of an Enbridge CER Pipeline’s Confidential Shipper Information, then that Employee shall not act as a conduit of that information to any other Marketing Function Employee or third party shippers and shall notify the Ethics and Compliance Office for Canada immediately.

For greater clarity, any Enbridge Affiliate Employee having access to or coming into contact with Confidential Pipeline Information or Confidential Shipper Information shall abide by this Code and **shall not serve as a conduit** of such information to any party that is not otherwise entitled to receive such information in compliance with this Code.

Confidential Shipper Information may be disclosed when aggregated with the confidential information of other customers in such a manner that no individual customer’s confidential information can be identified.

7. Independent Functioning

Transmission Function Employees shall function independently from Marketing Function Employees.

For greater clarity, transmission functions include the following activities in respect of Enbridge CER Pipelines:

- direct, organize or supervise the details of pipeline transportation functions.
- grant or deny transportation requests (including credit review); and
- negotiate agreements with shippers.

Marketing functions include the following activities in respect of Enbridge CER Pipelines:

- arrange for pipeline transportation of shipper's product.
- negotiate agreements for service on Enbridge liquids pipelines on behalf of the shipper company; and
- market crude oil or petroleum products.

In general, Marketing Function Employees should not conduct transmission functions and Transmission Function Employees should not conduct marketing functions. Specifically:

- Marketing Function Employees should not be on email or other distribution lists for reports containing Confidential Pipeline Information.
- Transmission Function Employees should be physically separated from Marketing Function Employees.
- Marketing Function Employees must not be allowed access to the computer systems that contain either Confidential Shipper Information or Confidential Pipeline Information (ex. the control centre, pipeline scheduling systems, financial reporting, shipper related data, project management, etc.).
- Employees should not be "cycled" between roles as Marketing Function Employees and Transmission Function Employees. Please contact the Ethics and Compliance Office for Canada in the event that an Employee is moving between such roles.
- If a Transmission Function Employee moves to a role as a Marketing Function Employee, the Employee is responsible for ensuring that any confidential communications from the Enbridge CER Pipeline are discontinued immediately.

This separation of Transmission Functions Employees from Marketing Function Employees is designed to ensure that Transmission Function Employees do not give preferential treatment or improperly disclose Confidential Pipeline Information or Confidential Shipper Information to Marketing Function Employees.

An Enbridge CER Pipeline is not required to function independently from other Enbridge CER Pipelines or Pipeline Affiliates. Enbridge CER Pipelines and Pipeline Affiliates may share Employees and Confidential Pipeline Information with each other, provided that it does not result in the preferential treatment of any shipper, especially Marketing Affiliates.

8. Transfer Pricing and Asset Transfers

Enbridge CER Pipelines will pay no more than fair market value, fully burdened cost or such other amount as approved or dictated by the CER or applicable regulator, for services provided to them by other Enbridge CER Pipelines, Enbridge Affiliates or Enbridge owned power facilities.

Regulated assets transferred, mortgaged, leased, or otherwise disposed of by an Enbridge CER Pipeline to an Enbridge Affiliate, or vice versa, must be at the fair market value for such assets or, where required, upon terms approved or dictated by the appropriate regulatory agency. Regulated assets transferred, mortgaged, leased, or otherwise disposed of by an Enbridge CER Pipeline to another Enbridge CER Pipeline, must be at the book value for such assets or, where required, upon terms approved or dictated by the appropriate regulatory agency. All such transactions must be properly documented and accounted for in the applicable accounting records.

9. Amendments

This code may be reviewed and amended by the Enbridge CER Pipelines from time to time.

10. Questions

If at any time Enbridge Employees have questions regarding this Code, they should contact the Ethics and Compliance Office for Canada.

11. Compliance Plan

To promote compliance with this Code the following steps will be taken:

- This Code will be distributed to all Employees likely to become privy to Confidential Pipeline Information or Confidential Shipper Information
- This Code will be posted on ELink.
- All Transmission Function Employees, Marketing Function Employees, and other Employees likely to become privy to Confidential Pipeline Information or Confidential Shipper Information will receive training regarding this Code on an annual basis.