

Enbridge Inc. Political Contributions Policy

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Applicability: **Applies to Enterprise**
Originator: **Public Affairs and Communications**
Approval:
Effective Date: **August 3, 2017**

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 in Canada and the United States and Our Statement on Business Conduct.

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. 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 regarding political preferences.

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

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

candidate or organization. The PAC was established by Enbridge (U.S.) Inc. and DCP Midstream LLC, a joint venture between Enbridge Inc. and Phillips 66. Enbridge-DCP PAC is directed by a board of employees of both Enbridge (U.S.) Inc. and DCP Midstream, which makes all decisions regarding the PAC's political contributions. Enbridge-DCP 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 available on the website of the **Federal Election Commission** and on the websites of election boards 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, we may use corporate funds in the United States to make contributions to 527 organizations (an organization with a 527 designation from the Internal Revenue Service confers eligibility for tax exemption).

States and provinces where Enbridge does business have different 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 any and all corporate contributions shall comply with all applicable laws and regulations.

Our political contribution decisions are guided by 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 Business Unit executive responsible for Public Affairs and Communications, Business Unit President, the Chief Executive Officer or Board of Directors. Enbridge's senior leader responsible for External Affairs in Canada and/or the United States reviews all contributions and ensures accountability to this policy. A record of all approved contributions will be maintained by Public Affairs and Communications. Enbridge's total annual corporate political contributions in Canada and the United States can be found in our annual Corporate Social Responsibility 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, state and provincial 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 on the websites of the **U.S. House of Representatives** (house.gov) and the **U.S. Senate** (senate.gov), and in Canada on the websites of Office of the Commissioner of Lobbying of Canada, as 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 Registration and 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: senate.gov/legislative/Public_Disclosure/LDA_reports.htm

- In the U.S., Enbridge and its registered federal lobbyists must also file semi-annual reports detailing, among other things, Enbridge-DCP PAC disbursements and personal and/or direct contributions to federal candidates. These forms (LD-203) are viewable by using the following link: senate.gov/legislative/Public_Disclosure/LDA_reports.htm
- 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: ocl-cal.gc.ca/eic/site/012.nsf/eng/home

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 pipeline and midstream 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 Corporate Social Responsibility Report lists the trade organizations where we contributed US\$50,000 or more in membership dues.

Governance

The Corporate Social Responsibility 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 Corporate Social Responsibility Report.