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	SAFETY AND ETI	HICS HELPLINE		
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Under Policy: Principles of Business Ethics			Verify revision is current prior to use.	

Contains commercially sensitive information. Refer to cover page to materials regarding restrictions.

# **SAFETY AND ETHICS HELPLINE STANDARD**

<b>Executive Sponsor</b>	Title	Date Approved	
Erica Young	Chief Legal Officer and Executive Vice President Corporate Development	February 28, 2020	
Content Owner	Title	Date Approved	
Erica Young	Chief Legal Officer and Executive Vice		

Review of this Standard is required within three years (March 2, 2023).

Revision history of this Standard is referenced in Schedule "B".

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### 1.0 PURPOSE

The <u>ENMAX Principles of Business Ethics Policy</u> refers to the <u>Safety and Ethics Helpline</u> ("the Helpline") through which <u>Employees</u> and <u>Contractors</u> ("<u>Complainants</u>") may make good faith reports anonymously if they suspect illegal or unethical behavior and are uncomfortable bringing their suspicions to their supervisors.

The <u>Helpline</u> is available 24 hours a day, 365 days a year to all <u>Employees</u> and <u>ENMAX Contractors</u>.

This <u>Standard</u> sets out the measures that will be taken to manage access to reports and to provide responses to <u>Complainants</u> while protecting the privacy of individuals, as appropriate, and the confidentiality of <u>ENMAX</u> information. Questions of interpretation of this <u>Standard</u> should be directed to the Executive Sponsor or Content Owner.

### 2.0 **DEFINITIONS**

Capitalized and underlined terms used in this <u>Standard</u> are defined in Schedule "A" attached to this <u>Standard</u>.

#### 3.0 REFERENCES

This Standard directly affects or is directly affected by the following:

- ENMAX Principles of Business Ethics Policy
- Compliance Policy

#### 4.0 ENMAX HELPLINE

- **4.1** The types of complaints or allegations received through reports on the <u>Helpline</u> can be very broad but generally fall into one of the following categories:
  - harassment or discrimination;
  - concerns about retaliation;
  - respectful workplace;
  - corporate policy being misapplied or disregarded;
  - misconduct, wrongdoing, theft, etc.;
  - insufficient training or workplace support;
  - safety issues, accidents, near miss incidents, health concerns;
  - · fraud or finance related issues; and
  - lawsuits or administrative claims.

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- 4.2 The <u>Content Owner</u> will review all complaints filed through the <u>Helpline</u> and will determine who is best suited to conduct an investigation of a complaint based on the following criteria:
  - the nature of the complaint;
  - the correct background/skill to investigate the matter;
  - potential conflicts of interest, due to a relationship (personal or reporting) with any
    of the parties involved in the investigation; and
  - fairness and impartiality.

A complaint from the <u>Helpline</u> may be investigated by a person or team determined to be appropriate and impartial to conduct the investigation by the <u>Content Owner</u> (the "**Investigator(s)**") in any of the following ENMAX departments:

- Human Resources;
- Legal counsel (internal or external);
- Internal Audit; and
- when determined appropriate by the <u>Content Owner</u>, an investigator external to ENMAX.
- **4.3** Each Investigator is responsible for logging onto the <u>Helpline</u> website and changing the originally assigned <u>Helpline</u> password so that it will be unique and known only to the individual Investigator. It is imperative that each Investigator take care to maintain the confidentiality of his or her password.

In the event of an actual or potential disclosure of a password, the Investigator will immediately, upon discovery:

- (a) change the password; and
- (b) inform the <u>Content Owner</u> of the disclosure.
- 4.4 When an Investigator is due to be absent for a week or more, an alternate must be assigned to take over his or her <u>Helpline</u> responsibilities. The Investigator will change his or her password and provide the assignee with the new password and the Investigator(s) username so that the assignee may access the <u>Helpline</u> website in accordance with this <u>Standard</u> in the Investigator's absence. Upon the Investigator's return, the password will once again be changed to something known only to the Investigator.

When an Investigator forgets his or her password, he or she will request a new password from the <u>Content Owner</u>. Upon receipt, this password will be changed once again to something unique known only to the Investigator.

When an individual ceases to be an Investigator, the <u>Content Owner</u> will be notified to delete that Investigator(s) username from the system. Upon the addition of an

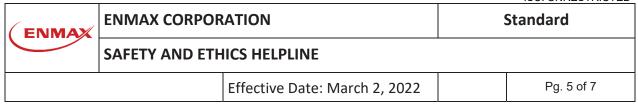
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Investigator, one of the existing Investigator(s) will notify the <u>Content Owner</u> to request a new username and password for that individual.

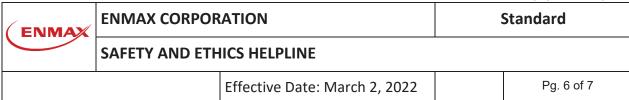
## 5.0 NOTIFICATION, INVESTIGATION AND RESOLUTION

- All investigations will be conducted in accordance with the <u>Safety and Ethics Helpline</u> <u>Investigation Process Procedure</u>. An initial response shall be provided by the Investigator to the Complainant through the Helpline within one week from the date of the report.
- 5.2 It is understood that an investigation can only be as good as the information provided in the complaint underlying it and it is therefore possible that an investigation may be inconclusive. In addition, the anonymity of the <u>Complainant</u> may be an obstacle to the investigation and resolution of a matter; whenever this is the case, the Investigator should consider asking the <u>Complainant</u> to reveal their identity and provide assurance that their identity will not be shared with any other <u>Employee</u> of <u>ENMAX</u>, without their prior consent.
- **5.3** Follow-up information will be provided by the Investigator to the <u>Complainant</u> through the Helpline even when an investigation has been inconclusive.



## **SCHEDULE "A" – DEFINITIONS**

Defined Term	Definition
Board of Directors	means the Board of Directors of <u>ENMAX</u> Corporation.
Complainant(s)	the person who has made a complaint of Inappropriate Behaviour or brings the issue to the attention of the employer.
Content Owner	means an <u>Employee</u> who has been appointed by the <u>Executive Sponsor</u> of a <u>Policy</u> to assist with the <u>Executive Sponsor's Policy</u> accountabilities as determined by the Policies, Standards, Procedures and Forms Standard.
Contractor(s)	means any contractor, sub-contractor, consultant or agent engaged by or on behalf of <u>ENMAX</u> , who is not an <u>Employee</u> .
Employee(s)	means a member of the Executive Team or any other person employed by <u>ENMAX</u> on a full or part-time basis.
ENMAX	means ENMAX Corporation and its direct and indirect Subsidiaries, other than Versant Power and Versant Power's direct and indirect subsidiaries.
Executive Sponsor	is an <u>Employee</u> with specific <u>Policy</u> development and Management accountabilities as designated by the Chief Executive Officer.
Policy/Policies	is/are principle based document(s) that contain information and direction in relation to the values and fundamental expectations of <a href="ENMAX">ENMAX</a> that is of sufficient importance that the Chief Executive Officer has determined it shall apply across the corporation to allow Personnel to understand their responsibilities and to guide their decision making and other actions.
Procedures	are documents designating the steps or processes that provide specific direction in order to achieve a uniform



Defined Term	Definition
	approach to executing a work or business activity.  Procedures are composed of steps which, when not executed in a specific order may result in an impact to health, safety, environment, customer service or business (operational, financial, regulatory, etc.) performance.
Safety and Ethics Helpline ("the Helpline")	is a helpline through which <u>Employees</u> and <u>Contractors</u> may make good faith reports anonymously and is supported by Xpera through its ConfidenceLine service.
Standard	is a document providing further direction, guidance and requirements that provides greater detail than that provided in a <u>Policy</u> and reflects Management's expectations to all <u>ENMAX</u> Personnel to allow them to understand further responsibilities not articulated in a <u>Policy</u> and to guide their decision making and other actions.

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# **SCHEDULE "B" – REVISION HISTORY**

Rev No.	Effective Date	Revision History
4	March 2, 2022	Content Owner updated.
3	October 5, 2020	Definitions for Company, ENMAX and Subsidiaries updated with the acquisition of Versant Power.
2	March 2, 2020	Policy refresh and update
1	March 20, 2014	New Standard
0	April 2, 2014	Final version reviewed and posted