

Enbridge Tax Strategy

2019 United Kingdom (“U.K.”) Tax Strategy
pursuant to the United Kingdom Finance Act 2016
[December 2019]

2019 U.K. Tax Strategy

Enbridge Inc. and subsidiaries (“Enbridge” or “the Company”), is publishing this statement in order to comply with the United Kingdom (U.K.) tax strategy publication requirements as set out in paragraph 16(2) of Schedule 19 to the Finance Act 2016.

GUIDING PRINCIPLES

Enbridge has a set of tax governance principles that guide us and are applicable to our approach to tax in every jurisdiction where we operate including the U.K. They include our tax mandate, tax risk philosophy and tax code of conduct.

Our tax mandate is to contribute to Enbridge’s vision of fueling people’s quality of life, being the leading energy delivery company in North America and maintaining our social license to operate by complying with all applicable tax laws in every jurisdiction in which we operate, ensuring accuracy and timeliness in our tax reporting and enhancing shareholder value by effecting all of our business transactions in a tax efficient and legal manner.

ENBRIDGE RISK MANAGEMENT AND GOVERNANCE WITH RESPECT TO U.K. TAXATION

Enbridge has a Corporate Financial Risk Management Policy which establishes the principles and authority limits to ensure that the earnings and cash flows of Enbridge are not materially impacted by unmanaged financial risk. The oversight and implementation of this policy is conducted by a committee of senior management through our Corporate Financial Risk Management Committee. Our Chief Financial Officer (“CFO”) chairs this committee and is the principal liaison with our Board and our Board’s Audit, Finance & Risk Committee. Our Board’s Audit, Finance & Risk Committee is responsible for reviewing specific risk categories under its oversight, including financial, commercial, strategic, legal and tax risks.

Our CFO is responsible for ensuring that our tax governance principles align with that of the enterprise. The Vice President of Tax reports to the CFO and is responsible for upholding the tax governance principles. Compliance, reporting and planning activities are managed by the Director of Tax Reporting and the Director of Tax Planning and are carried out by staff in accordance with our documented policies and guidelines.

Enbridge’s tax risk philosophy aligns with the Company’s overall low risk tolerance and seeks to minimize tax uncertainty and tax risk through: the development of a strong staff of tax professionals; close monitoring of domestic and global tax developments; timely engagement and collaboration across the organization; seeking tax rulings when required to confirm tax positions; compliance with tax laws in all jurisdictions in which we operate; and timely reporting to senior management and boards of directors. In addition, Enbridge has engaged U.K. tax professionals to ensure that tax risk specific to the U.K. is mitigated.

Enbridge provides full details of our governance structure and practices in our 2019 Management Information Circular. [\[link\] https://www.enbridge.com/investment-center/reports-and-sec-filings/-/media/Enb/Documents/Investor%20Relations/2019/ENB-ProxyStatement-2019-Eng.pdf](https://www.enbridge.com/investment-center/reports-and-sec-filings/-/media/Enb/Documents/Investor%20Relations/2019/ENB-ProxyStatement-2019-Eng.pdf)

ENBRIDGE TAX PLANNING

The Enbridge Tax Services Department supports all Enbridge businesses and ensures that business transactions are effected in a tax efficient manner in accordance with applicable tax laws in every jurisdiction where Enbridge operates.

Our tax code of conduct upholds our core values [\[link\] https://www.enbridge.com/about-us/our-values](https://www.enbridge.com/about-us/our-values) and requires that we act with integrity and demonstrate respect for the tax laws, tax authorities and other stakeholders in all jurisdictions where we operate through timely and accurate tax compliance and tax reporting, transparent communication and a spirit of cooperation. All employees of Enbridge are asked to review and acknowledge their compliance with the Statement on Business Conduct on an annual basis.

ENBRIDGE U.K. TAXATION RISK TOLERANCE

Enbridge has a low U.K. tax risk tolerance level which is aligned with its domestic and global risk tolerance. The most significant risk with respect to tax is the potential for legislative changes that would impact the Company’s financial performance in the U.K. and in any of the jurisdictions where Enbridge operates.

ENBRIDGE APPROACH TOWARDS DEALINGS WITH HER MAJESTY’S REVENUE AND CUSTOMS (“HMRC”)

Enbridge observes all relevant tax law, rules and regulations in every jurisdiction where it operates. Enbridge manages its relationship with the HMRC by adhering to compliance deadlines and remittance obligations. Enbridge responds to information requests from tax authorities, including the HMRC in a timely, cooperative and comprehensive manner. Enbridge has engaged tax professionals in the U.K. to ensure that all tax compliance obligations are met.