



INDIGENOUS PEOPLES POLICY

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| Executive Sponsor: | Senior Vice-President, Water Canada | Current Policy Effective Date: | February 22, 2022 |
| EPCOR Contact: | Director, P&GA Corporate | Review Frequency: | Biannually |
| Approval Level: | Leadership Council | Next Review Date: | 2024 |

1. Purpose

EPCOR Utilities Inc., and its subsidiaries (collectively “EPCOR”) operate in areas near or within Treaty territories and established or asserted traditional lands of Indigenous Peoples in Canada and the United States. EPCOR recognizes the importance of building strong and mutually beneficial relationships with Indigenous Peoples in the areas where we operate, and we are committed to learning from and collaborating with Indigenous Peoples.

We acknowledge that Indigenous Peoples’ deep connections to the land and water have not always been recognized, nor have their rights, history, culture, aspirations and diversity always been respected by broader society.

EPCOR has benefitted from operations near or within Indigenous traditional lands and territories for over 100 years. Through this Indigenous Peoples Policy (the “Policy”) and its implementation, EPCOR is declaring our commitment to recognizing and respecting the rights, traditions and worldviews of Indigenous Peoples.

EPCOR values Indigenous perspectives and strives to listen authentically and respond genuinely to the interests of Indigenous Peoples as they relate to EPCOR’s operations. This Policy, therefore, recognizes the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) as a framework for reconciliation.

2. Application

EPCOR recognizes and respects the constitutionally protected and other domestic legal rights of Indigenous Peoples in Canada and the United States. Therefore, this Policy applies to all the EPCOR group of companies across Canada and the United States. EPCOR’s contractors are also expected to provide services in a manner that is consistent with this Policy.

This Policy aims to guide and optimize EPCOR’s Indigenous relations, particularly in the areas of corporate leadership, employment and training, procurement, project origination and development, and community and environment. EPCOR also recognizes and acts in accordance with commitments made by all levels of government in Canada and the United States to protect and promote the rights and interests of Indigenous Peoples.

3. Guiding Principles

EPCOR aims to conduct its business in a manner that reflects the following Guiding Principles:

- **Build Relationships:** EPCOR commits to fostering and sustaining strong relationships with Indigenous Peoples based on mutual respect, trust, a willingness to listen and learn, and achieving common interests. EPCOR recognizes that it must demonstrate integrity in its conduct and actions in order to earn the respect and trust of Indigenous Peoples.
- **Engage Meaningfully:** EPCOR seeks to engage early, meaningfully and in good-faith on projects that may impact cultural practices or lands traditionally used by Indigenous Peoples. EPCOR strives to be responsive to the input received from Indigenous Nations and communities regarding its projects, especially as opportunities for Indigenous inclusion, cultural protection and cultural revitalization are concerned.
- **Value Indigenous Perspectives about Ecosystems:** In alignment with the Health, Safety and Environment (HSE) Policy, EPCOR is committed to preventing pollution and reducing environmental impacts, including those contributing to climate change and affecting the ecosystems in which EPCOR operates. This includes learning from Indigenous Peoples about their experiences with and knowledge of the lands, air and water and responding to opportunities and concerns of Indigenous Peoples related to the environment.
- **Build Internal Understanding:** EPCOR commits to providing employees with skills and knowledge-based training and initiatives in intercultural understanding, relationship building and legal requirements that foster a greater understanding of the history, rights, culture and perspectives of Indigenous Peoples.
- **Support Indigenous Business Development:** EPCOR seeks to develop mutually beneficial business relationships with Indigenous Nations, communities, and businesses where it operates. EPCOR commits to provide Indigenous businesses with equitable opportunities in procurement by developing and implementing an Indigenous procurement strategy, with input from Indigenous Peoples.
- **Advance Equitable Employment Opportunities:** EPCOR seeks to ensure that Indigenous people have equitable access to jobs, and that our workforce reflects the Indigenous population in the regions where we operate, consistent with the company's goal to have a workforce that is reflective of the diversity of the communities we serve.
- **Create an Inclusive Workplace:** In alignment with the Respectful Workplace Policy, EPCOR seeks to create an inclusive workplace where Indigenous employees feel accepted, supported, respected and heard; have equitable access to training and education opportunities; and where they are valued and enabled to professionally and personally succeed.
- **Develop Community Initiatives and Partnerships:** EPCOR commits to working in partnership with Indigenous Peoples to create and realize opportunities with them in training and education, employment and community development.

4. Roles and Responsibilities

EPCOR is accountable for demonstrating a commitment to the Guiding Principles set out in this Policy, and for building awareness and understanding about the Policy across EPCOR. To support the implementation of this Policy and related activities, EPCOR has established a cross-functional governance structure. The Indigenous Relations Steering Committee (IRSC) and associated Working Groups are accountable for monitoring corporate performance against this Policy. Performance will be evaluated on a holistic basis, referencing inputs such as:

- External feedback from Canadian Council for Aboriginal Business's Progressive Aboriginal Relations Program verification process;
- External benchmark relationship evaluation from a sampling of Indigenous Nations and communities;
- Feedback from other internal committees and groups related to the Guiding Principles; and
- Internal metrics aligned to specific initiatives named in this Policy.

EPCOR employees can refer inquiries regarding the Policy to the Director, Public and Government Affairs or the Legal Department, as appropriate, for advice or assistance.

5. Understanding the term "Indigenous Peoples"

EPCOR acknowledges that an official or legal definition of "Indigenous Peoples" has not been adopted in Canada or the United States, where it operates. EPCOR has used the term "Indigenous Peoples" in this policy, in the spirit of reconciliation and in recognition that Indigenous identities are diverse and depending on the context may include individuals with Indigenous legal status, urban Indigenous individuals, individuals with Indigenous ancestry, or individuals who belong to a non-status community.

EPCOR also acknowledges that the *Canadian Constitution Act, 1982* uses the term Aboriginal when referring to the "Indian, Inuit and Métis peoples of Canada." In the United States, government departments and laws use a number of terms to refer to Indigenous Peoples such as "Native American," "American Indian," and "Alaska Native." The United Nations recognizes the self-identification of Indigenous Peoples as a fundamental human right and notes that "considering the diversity of indigenous peoples, an official definition of 'indigenous' has not been adopted."

This policy recognizes that the term "Indigenous" is growing in acceptance and preference. To reflect EPCOR's multi-national footprint across North America and to foster a more inclusive approach in all aspects of the company's business, the term Indigenous Peoples shall be the preferred and accepted terminology within EPCOR as a whole, although more specific terms as noted in this section may be used where warranted or preferred by specific Indigenous Nations and communities.