

INDIGENOUS ENGAGEMENT GUIDELINE

1.0 INTRODUCTION

1.1 Purpose

This **Guideline** addresses how **AltaGas** will engage with **Indigenous Groups** when developing, operating and decommissioning energy infrastructure on or in proximity to lands where they exercise rights and interests.

1.2 Scope

This **Guideline** applies to any **AltaGas** employee, officer or director engaging with **Indigenous Groups** in conjunction with AltaGas energy infrastructure on their traditional lands.

2.0 POLICY STATEMENTS

AltaGas recognizes the value of building enduring and trusting relationships with **Indigenous Groups** when its activities are within or in close proximity to their traditional lands.

The intent of this **Guideline** is to guide the development of mutually beneficial relationships over the lifecycle of **AltaGas**' projects, while building business value from our business activities. **AltaGas**' approach to developing such relationships is guided by **AltaGas**' commitment to responsible development as manifested through **AltaGas**' core values and supporting policies, and the laws and regulatory requirements recognizing and respecting the rights of **Indigenous Communities** in the jurisdictions where we operate.

AltaGas recognizes the important role which business has in fostering reconciliation with Indigenous Peoples as outlined in the *Truth and Reconciliation Commission: Call to Action 92 "Business and Reconciliation."* In this spirit, AltaGas will also strive to implement the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP), as applicable under law.

3.0 OBJECTIVES

The objective of this **Guideline** is to:

- Guide the establishment and building of mutually beneficial long-term relationships with **Indigenous Groups** based on the principles of respect, transparency, inclusiveness, shared understanding and open communication.

- Ensure that **AltaGas**' engagement with **Indigenous Groups** respects their rights and interests as governed by applicable law within the jurisdictions in which **AltaGas** operates, as well as **AltaGas**' commitment to responsible development.
- Foster opportunities for **Indigenous Groups** to participate in the economic and social benefits of **AltaGas**' energy infrastructure projects and operations.

4.0 GUIDELINES

Consistent with applicable law and regulatory requirements, **AltaGas** will work with **Indigenous Groups** in proximity to its developments in an effort to develop relationships based on mutual respect and trust, a shared understanding of the issues, and collaborative problem-solving to attain mutually beneficial outcomes. To accomplish this effectively, **AltaGas** is committed to engaging and communicating with **Indigenous Groups** about matters of shared interest. Guidance is provided in eight focus areas. Additional guidance reflecting these focus areas may be developed for each jurisdiction in which **AltaGas**' energy infrastructure projects or operations are within or in close proximity to the legally recognized lands and traditional territories of **Indigenous Groups**.

4.1 Community Engagement

AltaGas will seek to engage with **Indigenous Groups** early and strive to create a respectful two-way dialogue. **AltaGas** will engage meaningfully with **Indigenous Groups** by: i) providing full information about **AltaGas** energy infrastructure projects; ii) endeavoring to accurately understand all issues, concerns and potential impacts on asserted or established Indigenous rights; and iii) responding to these issues and concerns. As the result of this dialogue, **AltaGas** will endeavor to minimize negative impacts of its existing and future development on lands used by **Indigenous Groups** for traditional activities, and work to achieve the free, prior and informed consent of **Indigenous Groups** throughout all stages of energy infrastructure development.

4.2 Business Development, Contracting and Capacity Building

AltaGas will work with **Indigenous Groups** with the intent to identify and provide opportunities to participate in the local energy industry, and share in long-term, sustainable benefits resulting from **AltaGas**' proximate developments, with due regard for safety, productivity, qualification and bidding requirements. The level of economic involvement of **Indigenous Groups** and their communities will be commensurate with impact of such proximate **AltaGas** project or operation to the rights and interests of such **Indigenous Groups**.

4.3 Community Investment

In keeping with **AltaGas**' desire to invest in community projects and initiatives for the benefit of local communities, **AltaGas may** undertake community investment with **Indigenous Groups** and their communities. Whenever possible, payments for community investments should be made subject to the receipt of a request or proposal for funding that clearly documents how any funding to be received from **AltaGas** will be used.

4.4 Indigenous Training and Employment

Where possible, **AltaGas** may take steps to work with educational and training institutions to develop initiatives that support knowledge building and skills development to help prepare members of **Indigenous Groups** for employment in the local energy industry.

4.5 Agreements with Indigenous Groups

While it is recognized that consultation does not necessarily give rise to an obligation to enter into an agreement, it may be desirable for **AltaGas** to enter into agreements with **Indigenous Groups** in order to satisfy a legal or regulatory obligation to consult, or to build good relationships with **Indigenous Groups**.

Long-term Agreements, such as Impact Benefit Agreements, that are negotiated between **AltaGas** and **Indigenous Groups** are subject to review and approval by the members of the **AltaGas** Executive Committee and Board of Directors. These long-term agreements will be ratified by both parties according to applicable law, policies, procedures and governance standards.

Agreements that are negotiated to define a process and associated capacity funding to enable **Indigenous Groups** to share information regarding the impacts from a proposed **AltaGas** project are subject to review and approval in accordance with the **AltaGas** Delegation of Authority. All payments made to **Indigenous Groups** pursuant to agreements will be tracked and recorded as required by applicable law and **AltaGas** policies, procedures and governance requirements.

Commercial arrangements and payments to be made by **AltaGas** to **Indigenous Groups** should be clarified and documented in agreements that are agreed to and ratified by both parties according to applicable law, policies, procedures and governance standards. **AltaGas** may from time to time adopt specific policies or procedures regarding commercial contracting with **Indigenous Groups**.

Best efforts should also be made to include relevant language in agreements stipulating that **AltaGas** is subject to foreign and domestic bribery, anti-corruption and other transparency legislation, and that payments made pursuant to agreements with **Indigenous Groups** must be in strict compliance with such applicable laws.

4.6 Indigenous Awareness Training for Employees and Contractors

AltaGas will work with employees and contractors on initiatives to enhance the knowledge of, respect and consideration for **Indigenous Groups** and their cultures. Such educational initiatives may include education on the history and culture of **Indigenous Groups**, the legacy of residential schools, the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP), Treaties and Indigenous Rights, conflict resolution, human rights and anti-racism.

4.7 Relationship Building and Hospitality Events

From time to time it may be reasonable to invite representatives of **Indigenous Groups** to participate in hospitality events for the purposes of building relationships. **AltaGas** representatives should only provide gifts or hospitality subject to the **AltaGas Code of Business Ethics** and supporting policies.

4.8 Record Keeping

Representatives of **AltaGas** that undertake engagement with **Indigenous Groups** and/or their representatives will document and keep thorough records of contact of all communications, information shared with **Indigenous Groups**, and commitments made to **Indigenous Groups**.

5.0 REPORTING ILLEGAL OR UNETHICAL BEHAVIOUR

Relationships with **Indigenous Groups** are of paramount importance to **AltaGas'** social and legal obligations, corporate reputation and ability for our activity to add value for our stakeholders. Pursuant to the **AltaGas Code of Business Ethics**, employees of **AltaGas** should report any real or perceived violations of this **Guideline** to their supervisor, or the Whistleblower Hotline at (844) 703-8114 or www.altagas.ethicspoint.com.

6.0 Definitions

“**AltaGas**” or the “**Company**” refers to AltaGas Ltd. and its subsidiaries.

“**Indigenous Groups**” refers to peoples who have cultures and ways of life that are distinct from the wider societies in which they live and their use of particular lands precede the presence of other inhabitants. Typically, **Indigenous Groups** have a collective attachment to traditional lands and ancestral territories; they have historically been reliant on the land and its natural resources for their livelihoods and have strong economic, cultural and spiritual ties to such

lands. The rights and interests of **Indigenous Groups** are expressed in international documents, and through national and, in some instances, provincial/state legislation.¹

“**Indigenous Rights**” refers to the collective rights that flow from **Indigenous Groups’** continued use and occupation of certain areas. They are inherent rights that **Indigenous Groups** have practiced and enjoyed since before European contact. Because each **Indigenous Group** functioned as a distinct society, there is no one overarching definition of what these rights are but, in general, they include rights to the land, rights to subsistence resources and activities, the right to self-determination and self-government, and the right to practice one’s own culture and customs including language and religion.

“**Guideline**” refers to this Indigenous Engagement Guideline.

7.0 RELATED DOCUMENTS

This is a Level 3 Guideline and shall be made accessible to employees enterprise-wide. This **Guideline** is related to the following policies and procedures:

- Anti-Bribery and Anti-Corruption Policy
- Community Investment Guidelines
- Code of Business Ethics
- Purchasing Policy
- Respectful Workplace Policy

This Guideline replaces the Indigenous Peoples Policy in its entirety.

To implement this **Guideline**, further guidelines and processes may be provided from time to time to ensure the **Guideline** is adapted and applied appropriately across **AltaGas’** operations and subsidiaries and to reflect evolving reporting and business practice laws and requirements.

8.0 RELATED APPLICABLE LEGISLATION, INTERNATIONAL DECLARATIONS AND GUIDELINES

This Guideline is intended to ensure **AltaGas** alignment with the following legislation, and alignment with the following international declarations as implemented under applicable laws:

- *Aboriginal Consultation Levy Act* (Alberta)
- *Declaration on the Rights of Indigenous Peoples Act* (Canada and British Columbia)
- *Extractive Sector Transparency Measures Act* (Canada)
- *Criminal Code* (Canada and United States)
- *Foreign Corrupt Practices Act* (United States)
- *Dodd Frank Act* (United States)
- United Nations Declaration of the Rights of Indigenous Peoples

¹ Adapted from the *United Nations Declaration on the Rights of Indigenous Peoples*, *International Labour Organization Convention 169*, and *International Financial Corporation Performance Standard 7: Indigenous Peoples*.

- International Financial Corporation Performance Standard 7: Indigenous Peoples
- Indigenous and Tribal Peoples Convention, 1989 (International Labour Organization Convention 169)
- Truth and Reconciliation Commission of Canada, Call to Action 92.

This **Guideline** may be amended from time-to-time to reflect legislative changes, and the emergence of new industry best practices with respect to the engagement of **Indigenous Groups** and the participation of **Indigenous Groups** in **AltaGas** activity.

9.0 ADMINISTRATION

For further guidance or interpretation on this Guideline, please contact the Stakeholder Relations team.

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