

Briefing: L3R Approach to Tribal Spend and Labor Tracking

Tribal Spend Commitment:

Enbridge has committed to create \$100 million (US) in economic opportunities for Native American Tribes, Tribal member businesses and Tribal members related to the Line 3 Replacement Project.

Tribal Spend Reporting Approach:

Enbridge is tracking the value of economic opportunities for:

- Minnesota Native American Tribes and Tribal member businesses working on the L3R Project
- Non-Minnesota Native American Tribes and Tribal member businesses working on the L3R Project
- Indigenous businesses from Canada working on the L3R Project
- Minnesota Tribal member wages
- Non-Minnesota Tribal member wages
- Tribal business spend and wages on the L3R Project in North Dakota, Minnesota and Wisconsin scopes of work
- Indigenous businesses are identified based on self-declaration of ownership
- As part of this self-declaration, documentation of Tribal membership is not required (inclusive of partnerships, joint ventures, and other business relationships)

Tribal Workers Reporting Requirement:

Pursuant to Order Paragraph 1.B. of the Commission's Order Accepting Tribal Economic Opportunity and Labor Education Plan as Modified, the attached report includes:

1. the gross number of hours worked by (or the number of full-time equivalent workers who are) Minnesota residents, as defined in Minn. Stat. § 290.01, subd. 7, and are enrolled tribal members of the Bois Forte Band of Chippewa, Fond du Lac Band of Lake Superior Chippewa, Grand Portage Band of Lake Superior Chippewa, Leech Lake Band of Ojibwe, Mille Lacs Band of Ojibwe, Red Lake Band of Chippewa, or White Earth Band of Ojibwe;
2. the gross number of hours worked by (or the number of full-time equivalent workers who are) Minnesota residents and enrolled tribal members of any other federally recognized tribe;
3. the gross number of hours worked by (or the number of full-time equivalent workers who are) enrolled tribal members of federally recognized tribes not covered by 1. or 2. above; and
4. the total gross hours worked (or total number of full-time equivalent workers who participated) in construction of the Project during the quarter.

Tribal Workers Reporting Assumptions:

Enbridge is tracking the number of Tribal workers and the hours worked by Tribal workers on the L3R Project. Enbridge is also tracking the total number of workers and the number of hours worked by all workers.

- Enbridge is obtaining this information through the contractors working directly for the L3R Project
- The direct contractors are responsible for tracking their employees and rolling out the labor tracking to their subcontractors
- All reports are returned to Enbridge through the general contractors
- General Contractors and subcontractors are implementing their own versions of a self-declaration policy to obtain the following key information from employees and subcontractor employees:
 - Are they a Tribe member? Yes or No
 - If yes, which Tribe/Band do they affiliate with?
 - What is their state of residence?

- As part of this self-declaration, documentation of Tribal membership is not required
- Also, workers can choose to "not disclose" for either of the Tribal questions
- All labor data reported back to Enbridge does not include names of individuals. Instead the general contractors assign a Unique Employee ID to each worker on the report.
- All the employment data will be aggregated by Enbridge and reported to the MNPUC in the categories requested as part of the Order approval