



Impact Assessment Act – Conditions 8.9, 8.10, 8.12

April 2024

Introduction

Context

The Federal Decision Statement provides approval for the Cedar LNG Project under the *Impact Assessment Act* based on conditions related to avoiding or reducing effects to federal areas of interest, including effects to Indigenous peoples.

Purpose

This document identifies the Cedar LNG Project approach to conditions 8.9, 8.10, and 8.12 of the Decision Statement.

As Pembina is the Operator responsible for the Cedar LNG Project, relevant Pembina policies and initiatives that apply to the Cedar LNG Project are identified in this approach.

This approach applies to Cedar LNG project team members. Cedar LNG Project team members include:

- Pembina employees working on the Cedar LNG Project
- Third-party contractors engaged in the Cedar LNG Project

The approach outlined in this document is expected to evolve over time as more information becomes available.

Conditions

8.9 Gender Equity and Diversity Plan

8.9 – The Proponent shall develop, prior to construction and in consultation with Indigenous groups, and implement, during all phases of the Designated Project, a Gender Equity and Diversity Plan to increase opportunities for Indigenous peoples, including Haisla Nation members and Indigenous women, to obtain and retain employment with the Designated Project. The Plan shall describe the means by which the Proponent will:

8.9.1 – Make available to Indigenous peoples that are employed by the Designated Project a senior official who is in a position to, and empowered to, address workplace situation(s) in relation to gender equity and diversity, including in terms of harassment, sexism, and violence

8.9.2 – Implement a mechanism for Indigenous peoples that are employed by the Designated Project to provide feedback to the Proponent in relation to gender equity and diversity, including by:

- 8.9.2.1 – documenting and responding to any feedback received as soon as feasible and
- 8.9.2.2 – communicating regularly with Indigenous peoples that are employed by the Designated Project to inform them of how they can make use of the feedback mechanism and how the Proponent has responded to any feedback received

8.10 Gender Equity and Diversity Plan Reporting

8.10 – The proponent shall develop, prior to construction and in consultation with Indigenous groups, and implement a follow-up program with respect to the implementation of the Gender Equity and Diversity Plan referred to in condition 8.9. As part of the implementation of the follow-up program, the Proponent shall:

8.10.1 – Monitor and report annually, during construction and the first five years of operation, employment data for the Designated Project by identity factor(s), based on voluntarily- disclosed disaggregated data provided by employees, and job type(s)

8.10.2 – Develop and implement modified or additional mitigation measures, which may include updating the Gender Equity and Diversity Plan, if the results of the monitoring referred to in condition 8.10.1 and information obtained by the Proponent during the implementation of the Designated Project (including feedback received through the mechanism referred to in condition 8.9.2), demonstrate that modified or additional mitigation measures are required to achieve gender equity and diversity

8.12 Safe, Respectful and Inclusive Conduct

8.12 – The Proponent shall develop, prior to construction and in consultation with Indigenous groups, relevant authorities and community stakeholders, and implement during all phases of the Designated Project, measures to promote safe, respectful and inclusive conduct in the workplace and the community. The Proponent shall demonstrate how federal adverse effects on Indigenous women and girls and calls to justice 13.1 to 13.5* directed to the extractive and development industries included in “Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls” are addressed in the development and implementation of the measures. As part of the measures, the Proponent shall:

8.12.1 – Implement a workplace anti-harassment, bullying, discrimination and violence policy that contains gender-appropriate and gender-specific policies and processes, including sexual harassment and assault counselling and confidential and culturally sensitive care

8.12.2 - Implement a policy regarding the use and possession of drugs and alcohol in the workplace with zero tolerance for use of, or being under the influence of, illicit drugs or alcohol during working hours

8.12.3 - Develop mandatory cross-cultural awareness training in consultation with Indigenous groups, and provide the training to employees of the Designated Project and contractors associated with the Designated Project

8.12.4 – Develop a Worker Code of Conduct that includes expectations and requirements in relation to the measures developed to promote safe, respectful, and inclusive conduct in the workplace and the community (including the policies referred to in conditions 8.12.1 and 8.12.2). When providing the Worker Code of Conduct to the Agency prior to construction, the Proponent shall confirm how employees of the Designated Project and contractors associated with the Designated Project will be made aware of the Worker Code of Conduct and will be required to comply with it

*See appendix for calls to justice 13.1 to 13.5



8.9 – 8.10 | Gender Equity and Diversity Plan and Reporting

Impact Assessment Act

Federal Decision Statement – Conditions

The following conditions are addressed in this section:

Condition	Refer to:
8.9 Gender Equity and Diversity Plan	
8.9 – The Proponent shall develop, prior to construction and in consultation with Indigenous groups, and implement, during all phases of the Designated Project, a Gender Equity and Diversity Plan to increase opportunities for Indigenous peoples, including Haisla Nation members and Indigenous women, to obtain and retain employment with the Designated Project. The Plan shall describe the means by which the Proponent will:	Page 5 - 6
8.9.1 – Make available to Indigenous peoples that are employed by the Designated Project a senior official who is in a position to, and empowered to, address workplace situation(s) in relation to gender equity and diversity, including in terms of harassment, sexism, and violence	Page 5 - 6
8.9.2 – Implement a mechanism for Indigenous peoples that are employed by the Designated Project to provide feedback to the Proponent in relation to gender equity and diversity, including by: <ul style="list-style-type: none"> • 8.9.2.1 – documenting and responding to any feedback received as soon as feasible and • 8.9.2.2 – communicating regularly with Indigenous peoples that are employed by the Designated Project to inform them of how they can make use of the feedback mechanism and how the Proponent has responded to any feedback received 	Page 5 - 6
8.10 Gender Equity and Diversity Plan Reporting	
8.10 – The proponent shall develop, prior to construction and in consultation with Indigenous groups, and implement a follow-up program with respect to the implementation of the Gender Equity and Diversity Plan referred to in condition 8.9. As part of the implementation of the follow-up program, the Proponent shall:	Page 5 - 6
8.10.1 – Monitor and report annually, during construction and the first five years of operation, employment data for the Designated Project by identity factor(s), based on voluntarily- disclosed disaggregated data provided by employees, and job type(s)	Page 7
8.10.2 – Develop and implement modified or additional mitigation measures, which may include updating the Gender Equity and Diversity Plan, if the results of the monitoring referred to in condition 8.10.1 and information obtained by the Proponent during the implementation of the Designated Project (including feedback received through the mechanism referred to in condition 8.9.2), demonstrate that modified or additional mitigation measures are required to achieve gender equity and diversity	Page 8
8.12.3 Mandatory Cross-Cultural Awareness Training	
8.12.3 - Develop mandatory cross-cultural awareness training in consultation with Indigenous groups, and provide the training to employees of the Designated Project and contractors associated with the Designated Project	Page 5 - 6

Cedar LNG Project Gender Equity and Diversity Plan

Purpose

We create the conditions for high performance by cultivating a workplace where all employees have a sense of belonging. For the Cedar LNG Project, we are focused on retaining and obtaining employment for Indigenous Peoples, including Haisla Nation members and Indigenous Women

Values

Safe We care for each other	Trustworthy We have each other's backs	Respectful We seek to be gracious and kind	Collaborative We are great together	Entrepreneurial We create to succeed
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Activities

<ul style="list-style-type: none"> Mandatory Indigenous & Tribal Cultural Awareness e-module training for new Cedar LNG Project team members Haisla-led cultural awareness training for Cedar LNG Project team members Mandatory policy review for all Cedar LNG Project Team members upon hire: <ul style="list-style-type: none"> Indigenous and Tribal Relations Policy Pembina Code of Ethics Pembina Drug & Alcohol Policy Health, Safety, and Environment Policy Pembina Respectful Workplace Policy (inc. violence & harassment) Community Relations Other optional training opportunities for Pembina-employed Cedar LNG Project team members include the Pembina Equity, Diversity, Inclusion (EDI) Foundations learning 	<ul style="list-style-type: none"> Celebration of National Indigenous Peoples Day on June 21 for Pembina-employed Cedar LNG Project team members Equity, Diversity, and Inclusion (EDI) Senior Advisor available to Pembina-employed Cedar LNG Project team members Performance Management that supports and rewards value-based behaviours for Pembina-employed Cedar LNG Project team members 	<p>Enable feedback and collaboration through:</p> <ul style="list-style-type: none"> Indigenous Inclusion Network established to provide opportunity for connection and feedback for Pembina-employed Cedar LNG Project team members Senior Officials available to address workplace situations in relation to gender equity and diversity, including harassment, racism, sexism, and violence Pembina Whistleblower Policy for confidential reporting as needed 	<ul style="list-style-type: none"> Development of a gender and indigenous inclusive recruitment approach for Operational positions Diversity metrics gathered through voluntary data submission and monitored for Cedar LNG annually Annual monitoring and refresh of Cedar LNG Gender Equity and Diversity Plan
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These efforts will be managed by the People Stream on the Cedar LNG Project Team

Note - Tactics may evolve as needed.

Summary of Gender Equity and Diversity Plan Tactics

Tactic	Description	Condition
Mandatory cultural awareness e-module training for new team members	Mandatory online training for all new Cedar LNG Project team members to build Indigenous cultural awareness, available through the Pembina SuccessFactors Learning System or the Vendor Management System.	8.12.3
Haisla-led cultural awareness training for team members	Haisla-led cultural awareness training focused on Haisla history and cultural awareness. Delivered by Haisla team member and planned on as needed basis.	8.12.3
Mandatory policy review upon hire to project team	Mandatory review of key policies facilitated and tracked through Pembina SuccessFactors or the Vendor Management System.	8.12, 8.12.1, 8.12.2, 8.12.4
EDI Foundations Learning	As part of an ongoing commitment to building a culture of inclusion and belonging, Pembina-employed Cedar LNG Project team members will have access to the EDI Foundations series, a virtual learning opportunity on the foundations of equity, diversity and inclusion (EDI) and supporting inclusive behaviours. EDI 400 is an Indigenous Inclusion learning module that builds on the EDI Foundation Series and provides a deeper understanding and valuing of Land Acknowledgements, Economic Reconciliation, and Pembina's commitment to Truth and Reconciliation Call to Action 92. EDI 400 will be available to Pembina-employed Cedar LNG project team members who have completed the EDI Foundations Series (EDI 100, 200 and 300) and the Indigenous Cultural Awareness e-module.	8.9
Celebration of National Indigenous Peoples Day	Celebrations are focused on supporting community and include local and/or online events.	8.9
EDI Senior Advisory Support	Team Member on Pembina Equity, Diversity and Inclusion team, dedicated to providing advisory support to Operational units, including the Cedar LNG project team.	8.9
Values-based Performance Management	Pembina-employed Cedar LNG Project team members are assessed on what they deliver, as well as how they deliver it, in alignment with Pembina values of Safety, Trust, Respect, Collaboration, and Entrepreneurship.	8.9
Indigenous Inclusion Network	The Indigenous Inclusion Network is available to Pembina-employed Cedar LNG Project team members and supports and promotes the importance of Indigenous contributions and inclusion, and promotes Indigenous awareness, appreciation, and greater representation.	8.9.2
Senior Official	The Pembina Privacy Officer and Director of HR Operations are available to address workplace situations in relation to gender equity and diversity, including harassment, racism, sexism, and violence, when needed. Their support can be accessed by using confidential Whistleblower channels, escalation through a leader, or confidential ticketing processes.	8.9.1
Pembina Whistleblower Policy	This feedback mechanism is intended to facilitate the reporting of serious but non-emergency concerns regarding Pembina actions or business conduct that may violate policies or applicable law. Refer to the Whistleblower Policy for more information.	8.9.2
Gender and indigenous inclusive recruitment approach	The Cedar Project Team People Stream Lead aims to design recruitment approaches for Cedar LNG which may include the approach to job postings and interview processes.	8.9
Diversity metrics	Diversity metrics gathered on a voluntary basis and in accordance with applicable privacy laws and monitored for the Cedar LNG Project annually. Pembina-employed Cedar LNG Project team members are able to adjust or add demographic data to Pembina HR systems	8.10, 8.10.1
Annual Monitoring and Refresh of Gender Equity and Diversity Plan	The Cedar LNG Project People Stream is responsible for executing against this plan and identifying updates based on data that is collected, used, and disclosed in accordance with applicable privacy laws.	8.10.2

Note - Tactics may evolve as needed.

Reporting on Gender Equity and Diversity Plans – Condition 8.10.1

Who is the audience?

- The audience of data collection efforts includes all Cedar LNG Project team members (Pembina employees and third-party contractors)

How is data collected?

- Data is collected in two ways
 - For contractors, data is collected via a survey tool or similar method
 - For Pembina employees, data is collected via internal HR systems or similar method
- Completion in both cases is entirely voluntary

What data is collected?

- Information about employees' gender identity and indigenous ancestry

How frequently is data collected and reported on?

- Annually

Note - Approach to data collection may evolve as needed.

SURVEY COLLECTION - Request For Information From Contractors Of The Cedar LNG Project

In accordance with regulatory requirements, the Cedar LNG Project is required to monitor and report data related to voluntarily disclosed disaggregated information regarding identity factors and job type(s). This monitoring and reporting obligation continues to apply until the period ending 5 years after the commencement date of operation of the Cedar LNG Project.

Your participation in answering the following questions is entirely voluntary, and will have no impact on your ability to work in support of the project, either based on your choice to participate or not, or based on any of the information you disclose. Should you choose not to participate in any or all questions, please select the answer "I choose not to disclose". Please note if providing your consent, that the information you provided may be identifiable in Cedar LNG and Pembina monitoring and reporting activities, per regulatory requirements.

This information is being collected to comply with the Cedar LNG Project legal obligations, and will be used and disclosed only for this purpose, and in accordance with applicable privacy laws. Should you have any questions or concerns prior to filling out this form, please contact [project team member] or [Pembina's Privacy Officer](#).

HR SYSTEM COLLECTION - Request For Information From Employees Of The Cedar LNG Project

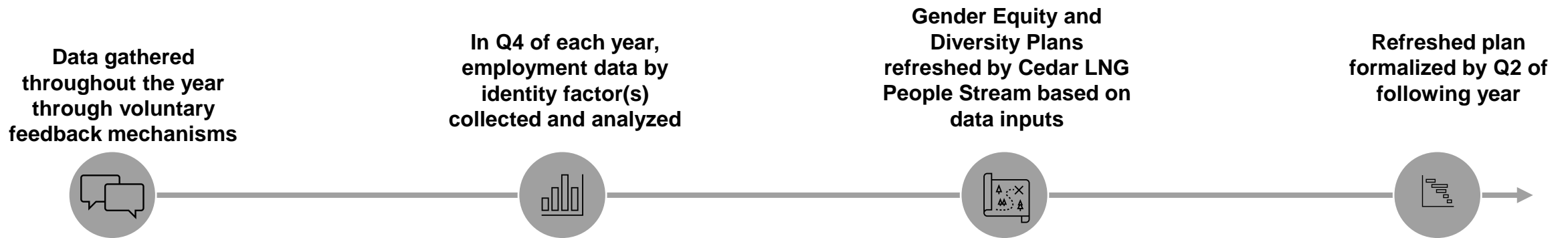
In accordance with regulatory requirements, the Cedar LNG Project is required to monitor and report data related to voluntarily disclosed disaggregated information regarding identity factors and job type(s). This monitoring and reporting obligation continues to apply until the period ending 5 years after the commencement date of operation of the Cedar LNG Project.

As a Pembina employee, you may have already disclosed some or all of the above information to the organization on a voluntary basis, or may choose to do so at this time. Pembina requires your consent to share this information to meet its monitoring and reporting obligations per regulatory requirements. Your consent to use and disclose the information you have provided is entirely voluntary, and will have no impact on your ability to work in support of the project, either based on your choice to participate or not, or based on any of the information you disclose. Please note if providing your consent, that the information you provided may be identifiable in Pembina's monitoring and reporting activities, per regulatory requirements.

This information is being collected to comply with the Cedar LNG Project legal obligations, and will be used and disclosed only for this purpose, and in accordance with applicable privacy laws. Should you have any questions or concerns prior to providing or denying your consent, please contact [project team member] or [Pembina's Privacy Officer](#).

Approach to Refreshing Gender Equity and Diversity Plan – Condition 8.10.2

We expect the Gender Equity and Diversity Plan to continue to evolve and be refined as Cedar LNG progresses through Construction and Operations and monitors the effectiveness of efforts. The process for updating Gender, Equity and Diversity Plans is outlined below.





8.12 | Policy Overview

Impact Assessment Act

Federal Decision Statement – Conditions

The following conditions are addressed in this section:

Condition	Refer to:
8.12 Safe, Respectful and Inclusive Conduct	
<p>8.12 – The Proponent shall develop, prior to construction and in consultation with Indigenous groups, relevant authorities and community stakeholders, and implement during all phases of the Designated Project, measures to promote safe, respectful and inclusive conduct in the workplace and the community. The Proponent shall demonstrate how federal adverse effects on Indigenous women and girls and calls to justice 13.1 to 13.5* directed to the extractive and development industries included in “Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls” are addressed in the development and implementation of the measures. As part of the measures, the Proponent shall:</p>	Page 11
<p>8.12.1 – Implement a workplace anti-harassment, bullying, discrimination and violence policy that contains gender-appropriate and gender-specific policies and processes, including sexual harassment and assault counselling and confidential and culturally sensitive care</p>	Page 11
<p>8.12.2 - Implement a policy regarding the use and possession of drugs and alcohol in the workplace with zero tolerance for use of, or being under the influence of, illicit drugs or alcohol during working hours</p>	Page 11
<p>8.12.4 – Develop a Worker Code of Conduct that includes expectations and requirements in relation to the measures developed to promote safe, respectful, and inclusive conduct in the workplace and the community (including the policies referred to in conditions 8.12.1 and 8.12.2). When providing the Worker Code of Conduct to the Agency prior to construction, the Proponent shall confirm how employees of the Designated Project and contractors associated with the Designated Project will be made aware of the Worker Code of Conduct and will be required to comply with it.</p>	Page 11

*See appendix for calls to justice 13.1 to 13.5

Supporting Policies and Initiatives

All policies require mandatory review and agreement by Cedar LNG Project team members upon hire, as mandated in contracts.

As Pembina is the Operator responsible for the Cedar LNG Project, relevant Pembina policies and initiatives that apply to the Cedar LNG Project are identified in this approach. Relevant policies are available on Pembina website for review.

Policy / Initiative	Description	Relevant Sections	Condition
Code of Ethics	The purpose of this Policy is to establish a high standard of integrity and ethical behavior that supports the organization's reputation and our relationships with our internal and external stakeholders. Applies to all officers, employees, consultants, contractors and directors of Pembina or the Cedar LNG project workforce.	<ul style="list-style-type: none"> Section F – Personnel Relations Section Q – Workplace Violence and Harassment Section R – Human Rights 	8.12, 8.12.1, 8.12.4
Drug & Alcohol Policy	This Policy supports the Health, Safety and Environment Policy and is part of the organization's overall approach to risk mitigation and safety. To this end, this Policy is designed to: (i) ensure that all Personnel are physically and mentally fit to safely perform their assigned duties; (ii) ensure that all supervisors and managers have clear direction on how to assess the need for testing, initiate testing protocols, and address Alcohol and Drug related issues; and (iii) deter the unlawful or inappropriate use of Alcohol, Drugs and other substances that may impair judgment, work performance or safety. Applies to all officers, employees, consultants, contractors, and directors of Pembina or the Cedar LNG Project workforce.	All	8.12.2
Indigenous Relations Policy	Pembina and the Cedar LNG Project are committed to striving for positive and mutually beneficial relationships with Indigenous communities. <i>Note – the Policy is titled Indigenous and Tribal Relations Policy to be inclusive of both Canadian and US jurisdictions.</i>	<ul style="list-style-type: none"> IV – Economic Development and Community Investment 	8.9, 8.12, 8.12.1
Respectful Workplace Policy (inc. violence & harassment)	The organization is committed to providing a respectful workplace in which all people are treated with respect and dignity. The safety and well-being of everyone working for or in connection with the organization is a priority and workplace harassment, discrimination and violence will not be tolerated in any form. The organization expects its Personnel to comply with the principles set out in this Policy at all times. The purpose of this Policy is to establish clear standards and expectations for all Personnel in order to prevent and protect individuals from workplace harassment, discrimination and violence. This Policy applies to all Personnel and any other individuals attending Pembina or the Cedar LNG Project workplaces. It applies to behaviour in the office, field, at client sites, during business-related travel, at conferences and training sessions, in the course of telephone, email and other communications, and at Pembina or Cedar LNG Project sponsored events	<ul style="list-style-type: none"> IV – Responsibilities 	8.12, 8.12.1, 8.12.4

Note - Updates to policies will be finalized in August 2024 in keeping with standard organizational approval timelines.

In addition to the policies above, Cedar LNG aims to engage and collaborate with Indigenous communities to address safety and security of Indigenous women and girls, as well as 2SLGBTQIA members of Indigenous communities throughout all stages of project planning, assessment, implementation, management, and monitoring. As part of this, Cedar LNG aims to collaborate with Indigenous communities to source appropriate social infrastructure and health services as required by the project, as defined in the Health Medical Services Plan and the Socioeconomic Management Plan. Finally, Cedar LNG aims to collaborate with Indigenous communities to support and participate in sustainable community development initiatives that have a meaningful and long-lasting impact, including but not limited to the equitable benefit of Indigenous and Tribal women, girls and 2SLGBTQIA peoples.

The background features a stylized, monochromatic illustration of a forest. On the left, a large, circular, segmented shape resembling a tree trunk or a large eye is prominent. To its right, several trees of varying heights and shapes are depicted with simple, clean lines. The overall style is minimalist and graphic, using shades of gray and white.

Appendix

Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls – Calls to Justice 13.1 to 13.5

Calls for Extractive and Development Industries:

- 13.1 We call upon all resource-extraction and development industries to consider the safety and security of Indigenous women, girls, and 2SLGBTQQIA people, as well as their equitable benefit from development, at all stages of project planning, assessment, implementation, management, and monitoring.
- 13.2 We call upon all governments and bodies mandated to evaluate, approve, and/or monitor development projects to complete gender-based socio-economic impact assessments on all proposed projects as part of their decision making and ongoing monitoring of projects. Project proposals must include provisions and plans to mitigate risks and impacts identified in the impact assessments prior to being approved.
- 13.3 We call upon all parties involved in the negotiations of impact-benefit agreements related to resource-extraction and development projects to include provisions that address the impacts of projects on the safety and security of Indigenous women, girls, and 2SLGBTQQIA people. Provisions must also be included to ensure that Indigenous women and 2SLGBTQQIA people equitably benefit from the projects.
- 13.4 We call upon the federal, provincial, and territorial governments to fund further inquiries and studies in order to better understand the relationship between resource extraction and other development projects and violence against Indigenous women, girls, and 2SLGBTQQIA people. At a minimum, we support the call of Indigenous women and leaders for a public inquiry into the sexual violence and racism at hydroelectric projects in northern Manitoba.
- 13.5 We call upon resource-extraction and development industries and all governments and service providers to anticipate and recognize increased demand on social infrastructure because of development projects and resource extraction, and for mitigation measures to be identified as part of the planning and approval process. Social infrastructure must be expanded and service capacity built to meet the anticipated needs of the host communities in advance of the start of projects. This includes but is not limited to ensuring that policing, social services, and health services are adequately staffed and resourced.

Disclaimer

The approach outlined in this document may be subject to change pending the evolution of the Cedar LNG Project and changing business needs over time.

The approach outlined in this document also contemplates policies that are in draft form and subject to change pending the standard annual internal review cycles. Some policies included in this approach will not be finalized until August 2024 in keeping with standard organizational approval timelines.