



July 27, 2016

Hon. Minister Cathy Bennett
Women's Policy Office
4th Floor, West Block
Confederation Building
St. John's, NL A1B 4J6
Government of Newfoundland and Labrador

RE: Condition of Environmental Assessment Release – TL 267, Overview of Specific Diversity Initiatives

Dear Minister Bennett:

The TL 267 Project was registered for provincial Environmental Assessment (EA) review under the Newfoundland and Labrador Environmental Protection Act (NL EPA, Part 10) in July 2015. Following governmental and public review of the EA Registration and an associated Addendum (February 2016), the Minister of Environment and Conservation announced on June 17, 2016 that the Project had been released from the EA review process, subject to a number of associated terms and conditions. These included the following:

"That Nalcor Energy's Diversity and Inclusion Strategy be applied to this project with a detailed overview of the specific diversity initiatives that will be applied to the project to be provided to the Minister Responsible for the Status of Women within 30 days of this release letter; and that quarterly reporting to that Minister on the progress toward these initiatives be implemented, with reporting commencing three months following project start-up."

This correspondence is intended to address the above noted condition of EA release for the TL 267 Project. We look forward to continuing to work with the Women's Policy Office to ensure the project is executed in a manner that meets this requirement of EA release.

Existing Corporate Workplace Diversity and Inclusion Policy

Nalcor Energy (including Hydro and its other subsidiaries) supports employment diversity and equity in its hiring and contracting practices. The corporation has existing and established policies and procedures related to these principles. This includes Nalcor Energy's overall Workplace Diversity and Inclusion Policy which states:

"A diversity of backgrounds, ideas and experiences enriches the workplace and contributes significantly to creativity, innovation and employee engagement. Nalcor is committed to an inclusive and respectful workplace and a working environment where individuals are respected and valued, so that they can reach their full potential."

The purpose of this policy is to outline the Company's standards for ensuring a culture of inclusion within our workplaces; ensuring that our policies, processes and practices are free of any unintended biases which may impede inclusion and organizational diversity; and ensuring that we are organizationally proactive in enabling the participation of women, aboriginals, visible minorities, and persons with disabilities within our workforce.

Nalcor began focused efforts on creating a diverse and inclusive work environment in 2011. Some of the preliminary work included:

1. Senior level support and governance over diversity and inclusion activities.
This included establishing:
 - a. An executive sponsor for Diversity and Inclusion
 - b. A Diversity and Inclusion Council that is chaired by a member of the executive team
 - c. An HR resource who is accountable to ensure that diversity and inclusion initiatives are met
2. Policies and Procedures Review:
 - a. Created a diversity and inclusion policy and reviewed our Respectful Workplace policy and Code of Ethics
 - b. Reviewed existing policies and collective agreements to ensure inclusive and gender neutral language
 - c. Updated recruitment process to reflect commitment to diversity and inclusion (i.e. employee orientation, job ads)
3. External Stakeholder Engagement - Gender
 - a. Government of NL - Women's Policy Office
 - b. Techsploration
 - c. Women in Resource Development Corporation
 - d. Partnership with NL Power and Industry Leaders – Electricity NL website

In 2016 the Diversity and Inclusion Council and Executive Chair were renewed. A new plan was created to integrate diversity and inclusion into five key business processes; 1) Workforce 2) Workplace 3) Market 4) Community 5) Supplier Relations. Related to these key processes Nalcor has developed a three year plan for various initiatives which is outlined below.

Business Process	2016 Initiatives	2017 Initiatives	2018 Initiatives
Workforce	• Create a 3 year communication strategy	• Implement planned activities	• Implement planned activities
	• Review Workforce Plan – create strategy to diversify workforce through recruitment opportunities	• Implement planned activities	• Implement planned activities
	• Conduct a self-identification baseline survey	• Update HRIS	
	• Gap closure strategy for recruitment to create a diverse workforce	• Implement planned activities	• Implement planned activities
	• Set staffing targets for the 4 underrepresented groups	• Achieve set targets	• Achieve set targets
Workplace	• Launch an Employee Resource Group (ERG) for Women in Leadership at Nalcor	• Launch new ERG	• Launch new ERG
Market Place	• None planned for 2016	• TBD	• TBD
Community	• Engage in 3 events that are supportive of diverse and inclusive work environments	• Continue community engagement	• Continue community engagement
Supplier Relations	• None planned for 2016	• Identify suppliers who support diversity • Identify suppliers who represent underrepresented groups • Contractor Engagement	• Set targets to engage diverse suppliers

Existing Code of Conduct / Business Ethics and Respectful Workplace Standards

Nalcor is dedicated to developing a work environment conducive to productivity and effectiveness and which enables employees to demonstrate Nalcor's values, with an emphasis on respect, dignity and teamwork in achieving its vision for diversity and inclusion.

Nalcor's employees are guided in this objective through the company's code of conduct and business ethics. The associated Employee Handbook outlines the specifics of the company's vision and values reflected in everyday work practice. The handbook states, for example, that:

"Nalcor employees deserve to work in an environment where they are treated fairly and with respect. We must all take steps to ensure we are respectful of others, supportive of the dignity and self-esteem of every person and promote an environment that is free of harassment. The importance of treating each other with respect applies to all Nalcor employees, regardless of their role or position."

As part of these initiatives, Nalcor identifies and seeks to address specific behaviours that the company will not tolerate in its workplace. These include: harassment, discrimination, diminishment of personal dignity and mutual respect, and the posting of offensive material in the workplace. Nalcor believes that a respectful workplace is a safe workplace, and that supporting gender equity and diversity will contribute positively and effectively to its primary goal of safety as well as the overall productivity of its workforce. Nalcor is committed to maintaining a safe, healthy and productive work environment where all persons involved in its business are valued and treated with respect and dignity.

NL Hydro has awarded a contract for the clearing of the majority of the TL267 right-of-way to Newfoundland and Labrador Vegetation Control Ltd. (NLVC). NLVC also has a Human Resources Operational Policy which states:

"The Employer will actively strive to create a workplace or potential workplace free of employment discrimination. Section 9 of the Human Rights Act prohibits discrimination in employment that is based on: race, religious creed, political opinion, colour or ethnic, national or social origin, sex, (including pregnancy), sexual orientation, marital status, family status, physical disability, mental disability or age if the person has reached 19 years of age. All job applicants have equal rights with the company and will be treated with respect and dignity. Affirmative action will be taken to ensure that all employment decisions, including but not limited to those involving recruitment, hiring, promotion, training, compensation, benefits, transfer, discipline, and discharge, are free from unlawful discrimination. The Company will provide reasonable accommodation to otherwise qualified individuals with a disability consistent with the law. What constitutes a reasonable accommodation depends on the circumstances and thus will be addressed by the Employer on a case-by-case basis."

Forbes Brothers Ltd. (FBL) has been awarded the contract for the construction of the line and the remainder of the clearing required for the right-of-way. FBL is committed to employment diversity. Specifically, they state:

"All decisions regarding recruitment, hiring, promotion, compensation, employee development decisions such as training, and all other terms and conditions of employment, will be made without regard to race, religious beliefs, colour, gender, sexual orientation, marital status, physical and mental disability, age, ancestry or place of origin. FBL demonstrates this commitment to equity and diversity, by seeking out joint venture/partnership opportunities, which support Aboriginal inclusion, respect various cultural practices and needs of Aboriginal communities, and support the growth and development of the four groups designated by the Federal Contractors Program (FCP): women, Aboriginal peoples, persons with disabilities and members of visible minorities."

Forbes Bros Ltd. (FBL) has committed to employment diversity with respect to all aspects of employment. All decisions regarding recruitment, hiring, promotion, compensation, employee development decisions such as training, and all other terms and conditions of employment, will be made without regard to race, religious beliefs, colour, gender, sexual orientation, marital status, physical and mental disability, age, ancestry or place of origin.

FBL demonstrates this commitment to equity and diversity, by seeking out joint venture/partnership opportunities, which support Aboriginal inclusion, respect various cultural practices and needs of Aboriginal communities, and support the growth and development of the four groups designated by the Federal Contractors Program (FCP): women, Aboriginal peoples, persons with disabilities and members of visible minorities.

Project Specific Initiatives

Specifically for TL 267 Hydro will ensure:

- The use of appropriate language and imagery in all job ads to encourage members of the underrepresented groups to apply for job opportunities. A gender equity and diversity statement will be included in any recruitment or other such promotional materials related to the development of the Project.
- Any Project-related promotional and communications materials will use positive images and articles / profiles regarding the involvement of persons from underrepresented groups in working on the Project.
- Ensuring that all employees, contractors and subcontractors are aware of Hydro's standards, practices and policies related to the employment and involvement of underrepresented groups.
- Hydro will require its contractors to provide a safe and supportive work environment for women and other employees from underrepresented groups. All Project facilities will comply with applicable regulatory requirements, including those related to accessibility and gender, as a minimum. This will include providing gender separate accommodations, washroom facilities and locker rooms wherever possible, as well as correctly fitting personal protective equipment and appropriate tools and equipment to accommodate individual needs where feasible.
- The use of gender inclusive / neutral language in all written correspondence and verbal communications with employees and stakeholders. Also, ensuring that gender equity and workplace diversity is evident in any images used in regular employee communications and notices.
- All Project workers will be provided with an orientation and induction program that includes health and safety, environmental awareness and overall Respect, Inclusion and Diversity. This will include developing and delivering information on Hydro's Respectful Workplace Standard to contractors and workers.
- Strict enforcement of the Respectful Workplace Standard, and a requirement for contractors to have an associated standard with a zero tolerance for harassment.
- Quarterly reporting will be provided to the Minister Responsible for the Status of Women on the progress toward these initiatives being implemented, with reporting commencing three months following project start-up.

Contractor's Responsibilities

Contractors will be provided with information related to their responsibilities in order to partner with NL Hydro, including their responsibility to:

- Have and follow their Respectful Workplace policy or use NL Hydro's Respectful Workplace Policy.
- Ensure job posting invite applications from designated groups.
- Ensure employees complete project orientation training, including respectful workplace training.
- Investigate any complaints or harassment or discrimination and report complaints to NL Hydro in a timely manner.

We will be contacting your office within the near term to discuss the measures outlined above and to continue to collaborate with the Women's Policy Office on women's employment issues.

Sincerely,



Marion Organ
Environmental Services Manager
Nalcor Energy

Cc: Brenda Grzetic, Women's Policy Office
Bas Cleary, DOEC
Brent Sellars, NL Hydro