ATCO Ltd. 2020 Sustainability Report Sustainability Framework Reference Document

This document includes references to a variety of publicly available documents that contain governance, economic, environmental, and social information for 2020, including the Annual Report, Sustainability Report, financial filings, and website.

The Sustainability Report includes data for ATCO Ltd. (ACO.X, ACO.Y). ATCO's sustainability reporting references Global Reporting Initiative (GRI) Standards and Sustainability Accounting Standards Board (SASB) as listed below.

For more information on the GRI please visit www.globalreporting.org. For more information on SASB please visit www.sasb.org.

SUSTAINABILITY FRAMEWORK INDEX

Standard Reference	Disclosure	Pag	ge Number and	d/or URL(s)	
GENERA	L DISCLOSURES				
GRI 102-1	Name of the organization	ATCO Ltd.	ATCO Ltd.		
GRI 102-2	Activities, brands, products, and	Sustainability Report (p. 4-5)			
	services	ATCO Ltd. Annual Information Form (p. 6-39)			
GRI 102-3	Location of headquarters	Calgary, Alberta, C	Calgary, Alberta, Canada		
GRI 102-4	Location of operations		Sustainability Report (p. 6-7)		
	·	ATCO Ltd. Annual I		- 1	
GRI 102-5	Ownership and legal form	Company shares are traded on the Toronto Stock Exchange (TSX) as ACO.Y (non-voting shares) and ACO.X (voting shares). ATCO Ltd. Annual Information Form (p. 2-3)			
GRI 102-6	Markets served	Sustainability Report (p. 6-7) ATCO Ltd. Annual Information Form (p. 6)			
GRI 102-7	Scale of the organization	Sustainability Report (p. 6-7) ATCO Ltd. Year In Review (p. 10- 11)			
GRI 102-8	Information on employees and	Indicator Units 2020		20	
	other workers	Organization Profile			
		Employees	count	6,1	83
		Workforce by Employment	Contract	Permanent	Temporary
		Gender			
		Male	count	3,937	286
		Female	count	1,738	222
		Region			
		Canada	count	4,877	419
		Mexico	count	33	0
		Australia	count	567	59
		South America	count	9	0
		Other	count	189	30
		Workforce by Employment	Гуре	Full-time	Part-time
		Gender			
		Male	count	4,200	23
		Female	count	1,873	87
		Employees Covered by a Co	ollective Agreement		
		Employees Covered by Collective Agreements	%	48.	5%
GRI 102-10	Significant changes to the organization and its supply chain	ATCO Ltd. Manage 24-39)	ment's Discu	ssion & Analy	<u>/sis</u> (p.

Standard		
Reference	Disclosure	Page Number and/or URL(s)
GRI 102-11	Precautionary Principle or approach	Although ATCO has not formally adopted the precautionary principle (as described in the U.N. Rio Declaration of 1992), our implementation of sustainability practices demonstrates a commitment to proactively identify, and prevent or mitigate negative impacts.
GRI 102-14	Statement from senior decision- maker	Sustainability Report (p. 1)
GRI 102-16	Values, principles, standards, and norms of behaviour	Vision & Values Code of Ethics
GRI 102-17	Mechanisms for advice and concerns about ethics	Integrity and Compliance
GRI 102-18	Governance structure	Sustainability Report (p. 43) ATCO Ltd. Management Proxy Circular (p. 24)
GRI 102-22	Composition of Board and its committees	ATCO Ltd. Board Members: Management Proxy Circular (p. 10-23) ATCO Ltd. Committee Members: Management Proxy Circular (p. 29-31)
GRI 102-23	Chair of the Board	ATCO Ltd. Management Proxy Circular (p. 14)
GRI 102-40	List of stakeholder groups	The groups we engage include, but are not limited to:
GRI 102-41	Collective bargaining agreements	Sustainability Report (p. 48-52)
GRI 102-43	Approach to stakeholder engagement	Sustainability Report (p. 34-41)
GRI 102-45	Entities included in the consolidated financial statements	ATCO Ltd. Consolidated Financial Statements Entities covered in the CFS are also covered in our sustainability reporting unless noted. The treatment of joint ventures may be addressed differently in ATCO's 2020 Annual Report with respect to financial performance.
GRI 102-46	Defining report content and topic boundaries	Sustainability Report (p. 47)
GRI 102-47	List of material topics	Sustainability Report (p. 3)
GRI 102-48	Restatements of information	Sustainability Report (p. 48-52)
GRI 102-49	Changes in reporting	Sustainability Report (p. 48-52)
GRI 102-50	Reporting period	January 1 - December 31, 2020
GRI 102-51	Date of most recent report	Our 2020 Sustainability Report was released in May 2021.
GRI 102-52	Reporting cycle	Annual
GRI 102-53	Contact point for questions regarding the report	sustainability@atco.com
GRI 102-54	Claims of reporting in accordance with the GRI Standards	ATCO's sustainability report references the specific GRI Standards listed in this document.
GRI 102-55	GRI content index	Sustainability Framework Index

Standard			
Reference	Disclosure	Page Number and/or URL(s)	
GRI 102-56	External assurance	Senior management and relevant staff have reviewed all information and believe it is an accurate representation of our performance. We undertook a variety of internal and external review activities on information presented in the 2020 Sustainability Report and associated disclosures. However, third-party assurance has not been conducted.	
MATERIA	L TOPICS		
ENERGY TI	RANSITION		
Company Indicator	Spend on new and refurbished infrastructure (\$)	Sustainability Report (p. 9)	
SASB EU-240-A4	Discussion of factors that affect energy affordability	Sustainability Report (p. 10)	
GRI 302-1	Energy consumption within the organization	10,446,527 GJ	
GRI 302-4	Reduction of energy consumption	Sustainability Report (p. 16-20)	
CLIMATE C	HANGE & ENVIRONMENTAL ST	TEWARDSHIP	
GRI 305-1 SASB EU-11-A1	Direct (Scope 1) GHG emissions	Sustainability Report (p. 48-52)	
SASB EU-110-A3	Direct (Scope 1) GHG emissions strategy including reducti on targets	Sustainability Report (p. 16-20)	
GRI 305-2	Energy indirect (Scope 2) GHG emissi ons	Sustainability Report (p. 48-52)	
GRI 305-4	GHG emissions intensity	In 2020, we estimate that emissions intensity for power generation was 0.41 CO ₂ e/MWh. Emissions intensity for power generation is calculated by dividing direct GHG emissions (CO ₂ e) by production (MWh equivalent), for facilities we operate regardless of financial ownership. We operate 398-MW of power generation in Canada, Australia, Mexico, and Chile.	
GRI 306-3	Significant spills	Sustainability Report (p. 48-52)	
GRI 307-1	Non-compliance with environmental laws and regulations	Sustainability Report (p. 48-52)	
GRI 303-5, SASB EU-140a.1	Water consumption	Sustainability Report (p. 48-52)	
GRI 305-6	Emissions of ozone- depleting substances	Sustainability Report (p. 48-52)	
GRI 305-7, SASB EU-120-A1	Nitrogen oxides, sulphur dioxides and other significant air emissions	Sustainability Report (p. 48-52)	
GRI 306-2	Waste by type	Sustainability Report (p. 48-52)	
	OPERATIONAL RELIABILITY & RESILIENCE		
SASB EU-540-A3	Transmission pipeline in- line inspections	Sustainability Report (p. 26)	
SASB EU-540-A4	Integrity discussion	Sustainability Report (p. 26)	
SASB EU-000-C	Length of natural gas transmission and distribution pipelines	Sustainability Report (p. 7) Sustainability Report (p. 26)	

Standard Reference	Disclosure	Page Number and/or URL(s)	
SASB EU-550-A2	System Average Interruption Duration Index (SAIDI), System Average Interruption Frequency Index (SAIFI)	Sustainability Report (p. 27) SAIDI Alberta Distribution: 4.09 Yellowknife: 0.19 NWT: 1.96 Yukon: 4.91 SAIFI Alberta Distribution: 1.58 Yellowknife: 0.64 NWT: 4.01 Yukon: 2.71	
SASB EU-000-C	Length of electricity transmission and distribution lines	Sustainability Report (p. 7)	
People			
GRI 403-9, SASB EU-320-A1	Work-related injury rates	Sustainability Report (p. 30) Sustainability Report (p. 48-52)	
GRI 401-1	Employee turnover rate	Sustainability Report (p. 48-52)	
GRI 405-1	Diversity of governance bodies and employees	ATCO Ltd. Management Proxy Circular (p. 26) Sustainability Report (p. 33) Sustainability Report (p. 48-52)	
GRI 406-1	Incidents of discrimination	Sustainability Report (p. 48-52)	
GRI 416-2	Non-compliance incidents regarding safety of products and services	Included as part of 'Number of Regulatory Noncompliance Incidents' in <u>Sustainability</u> Report (p. 48-52)	
GRI 418-1	Customer privacy breaches	Sustainability Report (p. 48-52)	
GRI 419-1	Non-compliance with laws and regulations in the social and economic areas	Included as part of 'Number of Regulatory Noncompliance Incidents' in <u>Sustainability Report</u> (p. 48-52)	
COMMUNI	TY & INDIGENOUS RELATIONS		
GRI 411-1	Incidents of violations involving rights of Indigenous Peoples	Sustainability Report (p. 48-52)	
OTHER TOPICS COVERED			
ECONOMIC			
GRI 201-1	Economic value generated and distributed	Sustainability Report (p. 48-52)	
GRI 201-3	Coverage of defined benefit pension plan obligations	Sustainability Report (p. 48-52)	
GRI 201-4	Financial assistance received from governments	Sustainability Report (p. 48-52)	
GRI 205-3	Corruption incidents	Sustainability Report (p. 48-52)	

ENVIRONMENTAL DATA ON A FINANCIAL CONTROL BASIS

The table below reports data for ATCO Ltd. (ACO.X, ACO.Y).

Environmental data reported in the Sustainability Report is on an operational control basis which includes 100 per cent for facilities where ATCO, or one of its subsidiaries, has operational control, regardless of percentage of financial ownership. Operational control is defined in alignment with the GHG Protocol.

As sustainability reporting standards and requirements evolve, we continue to progress our disclosures to meet the needs of shareholders, investors, and other stakeholders. In line with this effort, data for select environmental indicators reported below is broadly guided by the GHG Protocol's definition of financial control. This includes 100 per cent of data from Canadian Utilities Limited, the equity share of joint ventures where available, and excludes entities ATCO does not have financial control of, such as Neltume Ports. The treatment of various entities may be addressed differently in ATCO's 2020 Annual Report with respect to financial performance.

2020 ENVIRONMENTAL DATA ON A FINANCIAL CONTROL BASIS

Environmental Indicator	2020 Financial Control Basis	2020 Operatorship Basis
Direct greenhouse gases - Scope 1 (kilotonnes CO ₂ e)	640	873
Indirect greenhouse gases - Scope 2 (kilotonnes CO ₂ e)	232	232
Sulphur dioxide (tonnes)	27	36
Nitrogen oxides (tonnes)	1,530	1,796
Particulate matter (PM2.5) (tonnes)	20	22
Carbon monoxide (tonnes)	577	608
Volatile organic compounds (tonnes)	166	188
Water Use (million m³)	0.9	1.5
Hazardous Waste (tonnes)	1,819	1,820

TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

ATCO has always been a proponent of reporting core non-financial information and indicators to provide meaningful, efficient and transparent disclosures in priority areas for customers of our sustainability reporting (i.e. investors, business partners, customers, communities, Indigenous groups, employees, and governments).

In 2020, ATCO expanded alignment to the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) recommendations. We have provided available mapping to existing disclosures below, and plan to continue to evolve our external disclosure around climate risks and opportunities in alignment with the TCFD recommendations.

For more information on the TCFD please visit <u>www.fsb-tcfd.org</u>.

LOCATION OF TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES (TCFD) ALIGNED DISCLOSURES

TCFD Recommendations	Links to ATCO Information	
General Disclosures		
Disclose the organization's governance around climate-related risks and opportunities.	Describe the board's oversight of climate-related risks and opportunities.	Management Proxy Circular (p. 24-31) Sustainability Report (p. 42-45)
	Describe management's role in assessing and managing risks and opportunities.	Management Proxy Circular (p. 24-31) Sustainability Report (p. 42-45)
	Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	Management's Discussion & Analysis (p. 7-12) Management's Discussion & Analysis (p. 41-45)
Strategy		
Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.	Describe the impact of climate- related risks and opportunities on the organization's businesses, strategy, and financial planning.	Management's Discussion & Analysis (p. 41-45) Management's Discussion & Analysis (p. 59-66) Sustainability Report (p. 18-20)
	Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Management's Discussion & Analysis (p. 59-60) Sustainability Report (p. 18-20) Sustainability Report (p. 42-45)
Risk Management		
Disclose how the organization identifies, assesses, and manages climate-related risks.	Describe the organization's processes for identifying and assessing climate-related risks.	Management's Discussion & Analysis (p. 59-66) Sustainability Report (p. 18-20) Sustainability Report (p. 42-45)
	Describe the organization's processes for managing climate-related risks.	Management's Discussion & Analysis (p. 59-60) Sustainability Report (p. 18-20) Sustainability Report (p. 42-45)
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Management's Discussion & Analysis (p. 59-66) Sustainability Report (p. 18-20) Sustainability Report (p. 42-45)
Metrics and Targets		
Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Management Proxy Circular (p. 49-63) Sustainability Report (p. 48-49)
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	Sustainability Report (p. 18-20) Sustainability Report (p. 48-49)
	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Management's Discussion & Analysis (p. 16-20) Sustainability Report (p. 18-20)