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| Policy Owner:           | VP of Finance & Accounting<br>Directors of Construction |
| Original Issue Date:    | 4/13/11   |
| Revision Number:        | 4   |
| Revised Effective Date: | 2/5/20  |
| Approved By:            | Policy & Ethics Committee                               |

## ASSET DONATION & DISPOSAL POLICY

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### PURPOSE

The purpose of this policy is to define the nature of assets or other ATC property that employees and contractors are authorized to take possession of or donate on behalf of ATC Management Inc. ('ATC' or the 'Company').

### SCOPE

This policy applies to all ATC employees and contractors.

### DEFINITIONS

*Assets* – Assets may include, but are not limited to, ATC electronic/office equipment, wood poles, structures, trees/timber, scrap material from job sites, and other consumables (e.g. soil, stakes, fencing).

*Contractor* – See [Worker Classification Policy](#)

### RESPONSIBILITIES

#### *Asset Donations*

ATC employees are responsible for:

- Identifying an appropriate asset donation recipient, ensuring no conflicts of interest exist
- Completing the [Asset Donation Request Form](#) with input from various functional areas, as depicted on the form
- Obtaining appropriate internal approvals prior to making a commitment to the donation recipient
- Serving as a point of contact between ATC and the donation recipient
- Coordinating and communicating all aspects of the physical asset transfer to ensure the safety, security and environmental impact of the donation
- Ensuring all supporting documentation has been received and post transfer action items have been completed, per the Asset Donation Request Form

#### *Asset Disposals*

ATC employees and contractors should utilize the following decision matrix to determine whether it is appropriate to take an ATC asset for personal use, after it has been used for its intended business purpose. The following list is not exhaustive; seek guidance from the Policy Owners on assets not referenced within this policy. Completion of the [Asset Donation Request Form](#) is required for both asset donations and disposals.

| <p style="text-align: center;"><b>APPROPRIATE</b><br/>Asset has no market value<sup>1</sup></p>  | <p style="text-align: center;"><b>INAPPROPRIATE</b><br/>Asset has market value</p>   |
|--|--|
| <p style="text-align: center;"><i>Asset may be distributed to ATC employees<sup>2</sup>, contractors or other third parties for personal use</i></p>   | <p style="text-align: center;"><i>ATC employees and contractors are prohibited from taking items of value for personal use</i></p>   |
| <ul style="list-style-type: none"> <li>• Wood poles<sup>3</sup></li> <li>• Wood stakes or other non-recyclable consumables</li> <li>• Degraded timber mats</li> <li>• Soils<sup>4</sup></li> </ul> | <ul style="list-style-type: none"> <li>• Marketable timber<sup>5</sup></li> <li>• Recyclable materials<sup>6</sup></li> <li>• Materials with scrap value<sup>6</sup></li> <li>• Lattice towers</li> <li>• IT / electronic equipment</li> <li>• Office furniture / equipment<sup>7</sup></li> <li>• Relay panels</li> </ul> |

## REPORTING

It is the responsibility of all ATC employees and contractors to report any suspected violations of this policy, in accordance with ATC's [Open Door Policy](#).

## EXCEPTIONS/VIOLATIONS

Exceptions to this policy require the approval of the Policy Owners listed above.

Employees who violate this policy are subject to disciplinary action, up to and including termination.

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<sup>1</sup> Fair market value is determined by Asset Accounting and/or Supply Chain.

<sup>2</sup> ATC-paid transportation of materials should be minimized; however, it may be necessary under certain circumstances to support cost effective disposal. In such circumstances, a cost/benefit analysis must be included with the Asset Donation Request Form.

<sup>3</sup> ATC Construction Managers are responsible for ensuring recipients complete the [Pole Sale/Giveaway Release Form](#) and submitting completed forms to ATC Legal.

<sup>4</sup> Soil disposal follows the [Substation Soil and Groundwater Management Practice](#).

<sup>5</sup> Marketable timber is wood that will command a price in the market, which can be identified by a certified forester (e.g. ATC vegetation management specialist or designee). Marketable timber does not include chips, brush or treated wood. Timber is first offered to the landowner from whose property it was cut. If the landowner does not want the timber, it may be donated to a community, another landowner or made available to the public. ATC employees and contractors may take timber that has been made available to the public, if done so on personal time with their own transportation.

<sup>6</sup> Materials with scrap value should be recycled with payments made to ATC.

<sup>7</sup> This policy does not apply to office equipment / furniture auctioned off to ATC employees for charitable purposes.