



PURPOSE

The purpose of this policy is to define the nature of assets or other ATC property that employees, contingent workers and contractors are authorized to take possession of or donate on behalf of ATC or the 'Company'. 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, mats, fencing, etc.). Contingent Worker and Contractor roles are defined in the Worker Classification Policy.

SCOPE

This policy applies to all ATC employees, contingent workers and contractors.

RESPONSIBILITIES

Completion of the Asset Donation Request Form is required for both asset donations and disposals.

Asset Donations

ATC employees are responsible for:

- Identifying an appropriate asset donation recipient and 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, contingent workers and contractors are responsible for:

- Utilizing the following guidelines 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.

Appropriate distributions - have no market value as determined by Asset Accounting and/or Supply Chain and may be distributed to ATC employees, contingent workers, contractors or other third parties for personal use. 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.

Examples of appropriate distributions include:

- Wood poles - ATC Construction Managers are responsible for reaching out to ATC Legal for the proper form and ensuring recipients complete the form and submittal to ATC Legal.
- Wood stakes or other non-recyclable consumables
- Degraded timber mats
- Soils - Soil disposal follows the Substation Soil and Groundwater Management Practice.

Inappropriate distributions - have market value and ATC employees, contingent workers and contractors are prohibited from taking items of value for personal use.

Examples of inappropriate distributions include:

- Lattice towers
- IT / electronic equipment
- Relay panels
- Office furniture / equipment - This policy does not apply to office equipment / furniture that is auctioned to ATC employees for charitable purposes.
- Marketable timber - 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, contingent workers and contractors may take timber that has been made available to the public, if done so on personal time with their own transportation.
- Recyclable materials or materials with scrap value - Materials with scrap value should be recycled with payments made to ATC.

REPORTING

It is the responsibility of all ATC employees 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, Contingent Workers and Contractors who violate this policy are subject to disciplinary action, up to and including termination.