









From: traceypennell@nalcenergy.com
Sent: Friday, May 20, 2016 5:33 PM
To: koneill@nlh.nl.ca; markking@nalcenergy.com
Cc: annmalone@nalcenergy.com
Subject: ATIPP - final response
Attachments: Appendix A - LCMC - Project Delivery Team - Organization Charts - 2015 (R).pdf; Appendix B - Mode of Employment.pdf; Appendix C - Positions Provided by Recruitment Agency.pdf; Appendix D - Position and Rates.pdf; Appendix E - Number of Positions Provided by Recruitment Agencies - last 5 years.pdf; Appendix F - Internal Audit and Correspondence (R).pdf; R - Final Response - PB-320-2016-signed.pdf

Attached please find the final response for the request that just went out.

 Appendix A - LCMC - Project Delivery Team -
 Organization Charts - 2015 (R).pdf
 Appendix B - Mode of Employment.pdf
 Appendix C - Positions Provided by Recruitment Agency.pdf
 Appendix D - Position and Rates.pdf
 Appendix E - Number of Positions
 Provided by Recruitment Agencies - last 5 years.pdf
 Appendix F -
 Internal Audit and Correspondence (R).pdf signed.pdf
 R - Final Response - PB-320-2016-

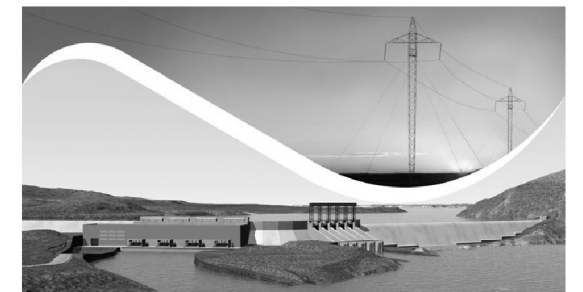
	<p>Tracey L. Pennell Legal Counsel ATIPP Coordinator Nalcor Energy t. 709 778-6671 f. 709 737-1416 e. TraceyPennell@nalcenergy.com w. nalcenergy.com</p>
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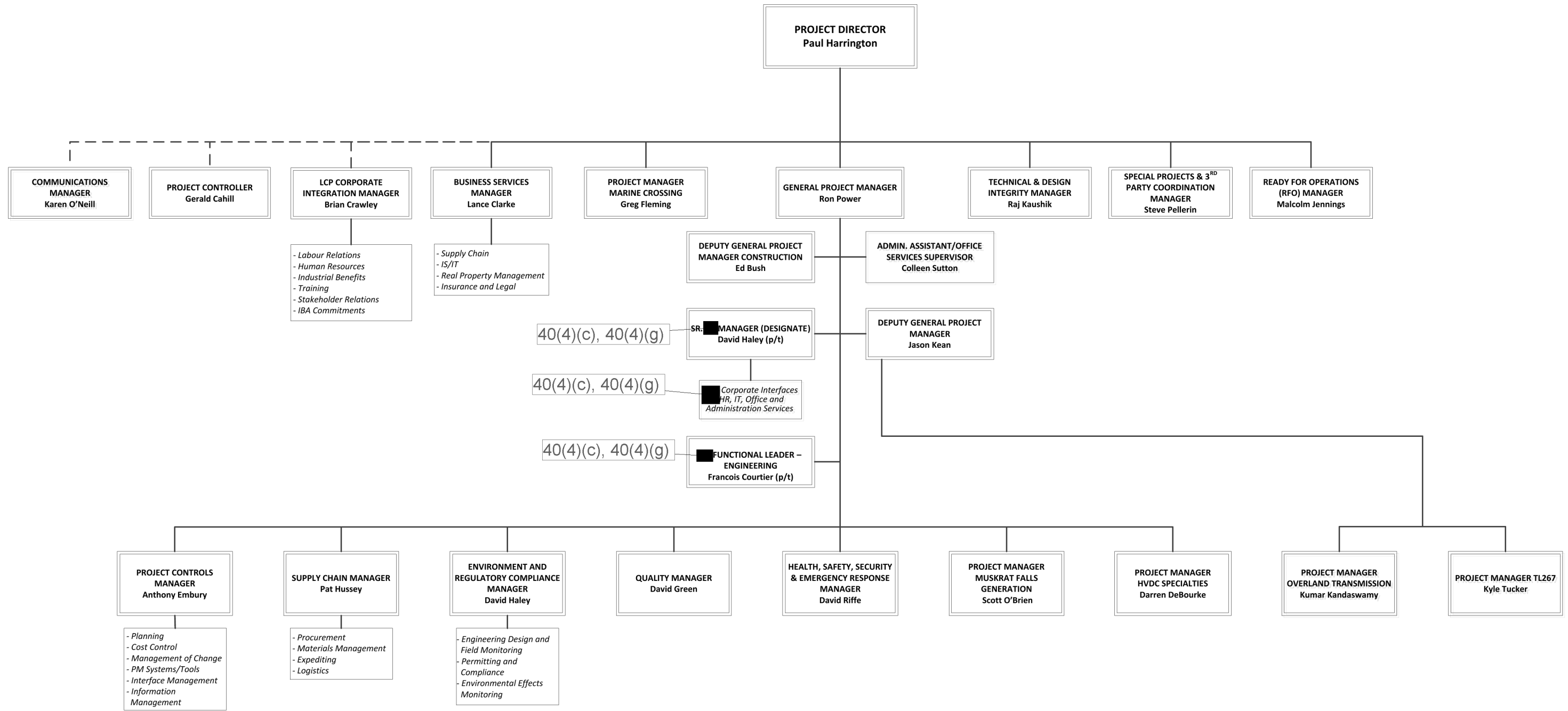
Lower Churchill Management Corporation Project Delivery Team Organization Charts

2015



Lower Churchill Project

Chart LCP1: Management Team



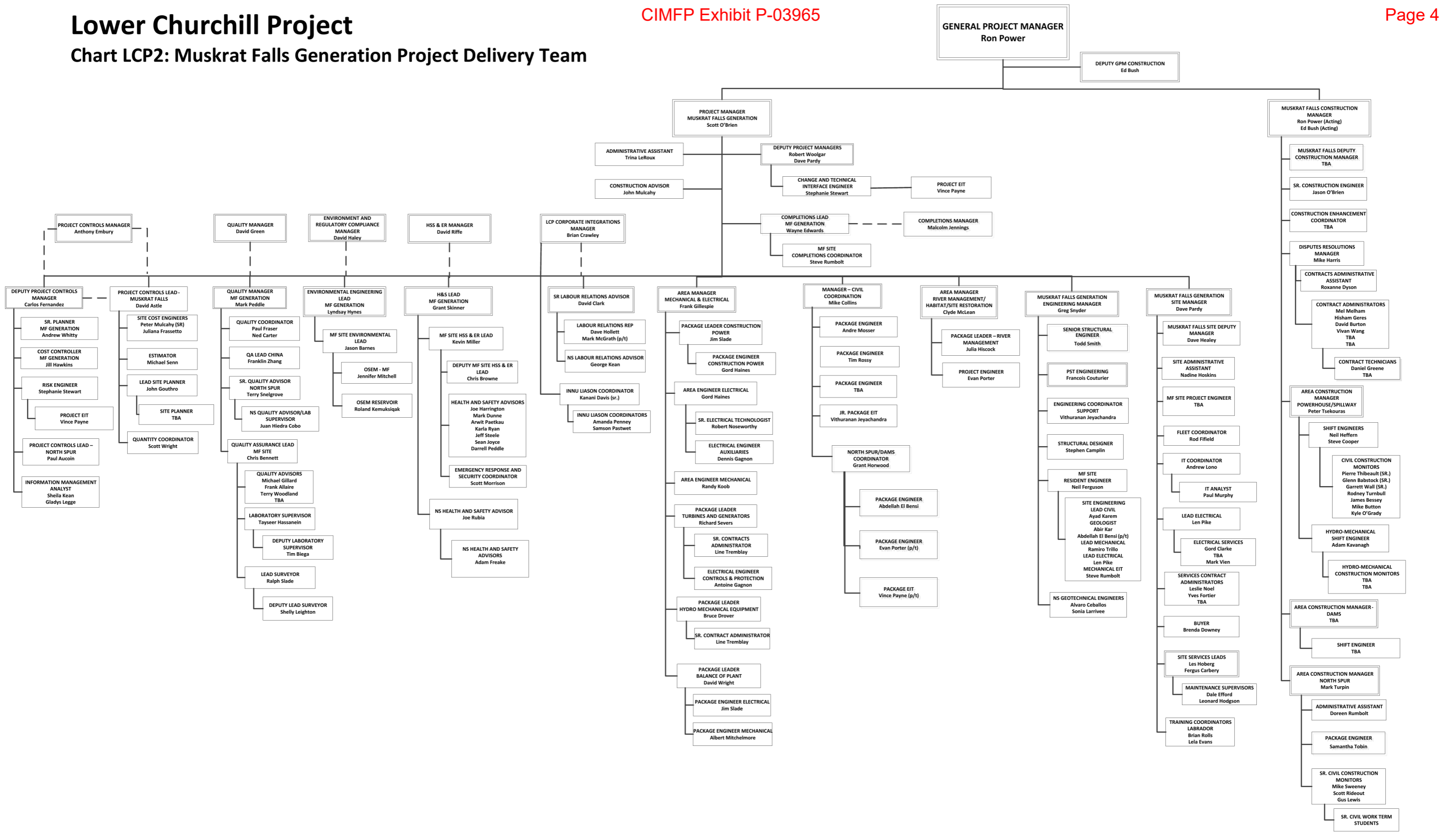
REPORTING LEGEND

———— Direct Management Reporting Line

- - - - Functional Reporting Line

Lower Churchill Project

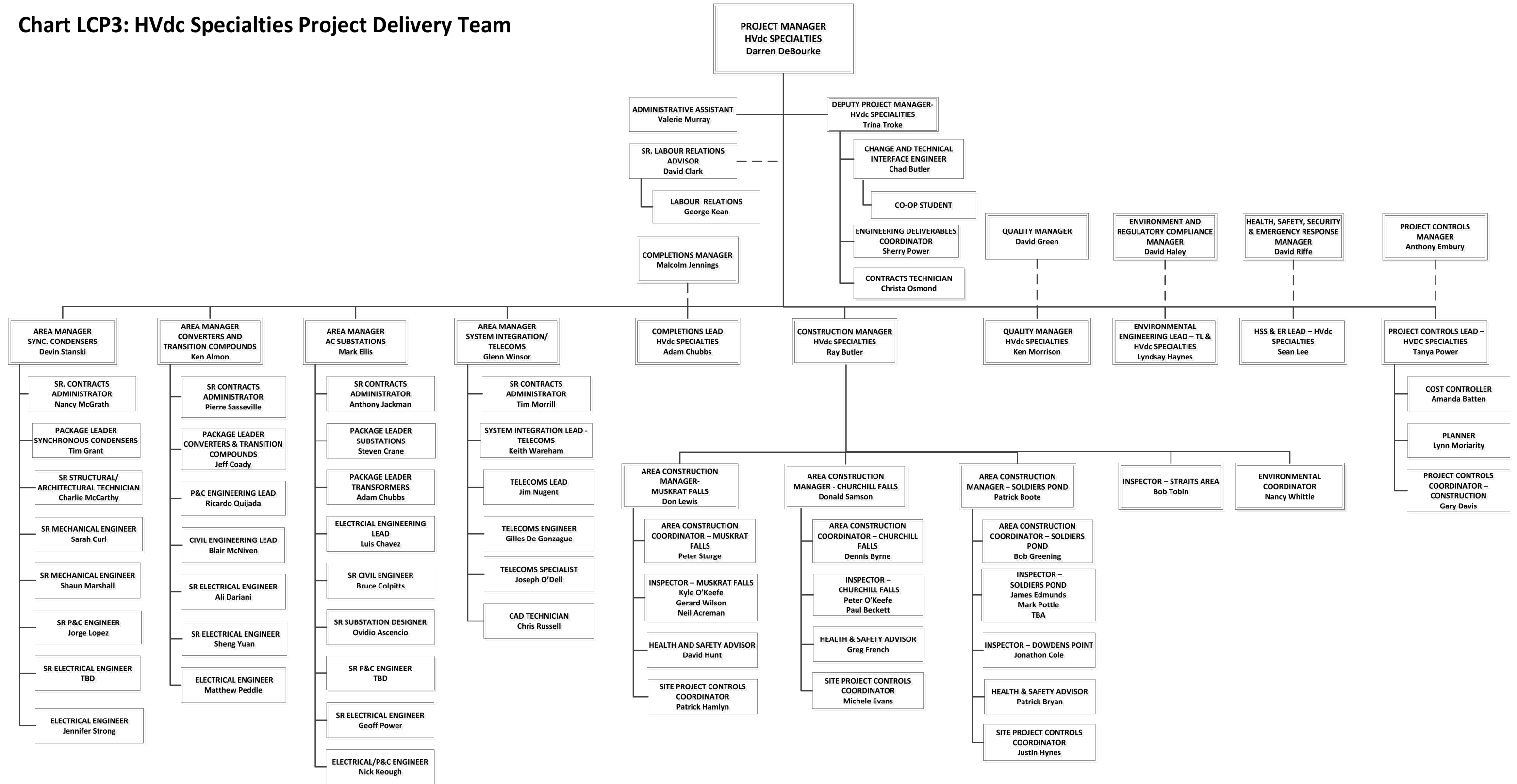
Chart LCP2: Muskrat Falls Generation Project Delivery Team



REPORTING LEGEND
 — Direct Reporting
 - - - In-Direct Reporting

Lower Churchill Project

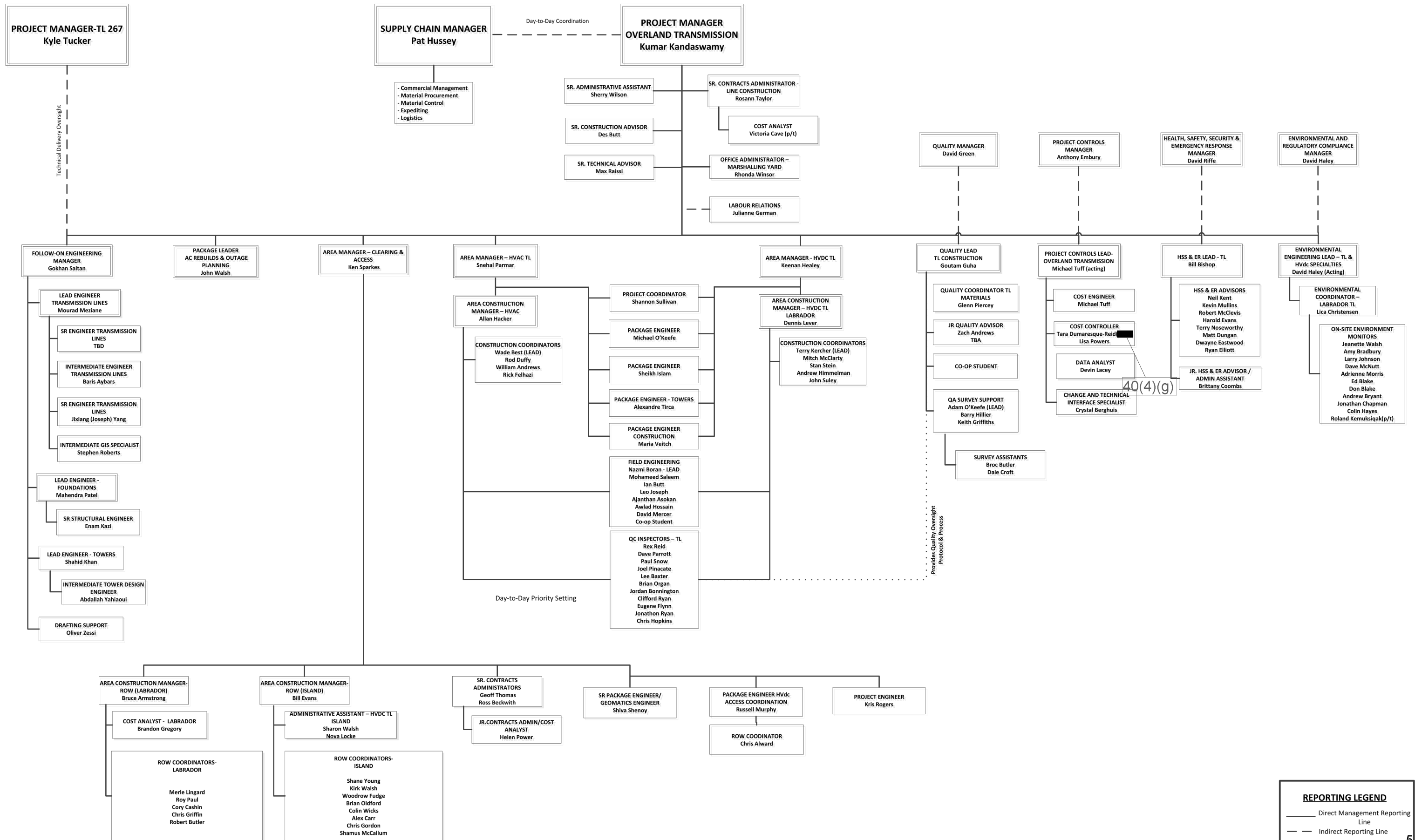
Chart LCP3: HVdc Specialties Project Delivery Team



REPORTING LEGEND

- Direct Management Reporting Line
- - - Indirect Reporting Line

Chart LCP4: Overland Transmission Project Delivery Team



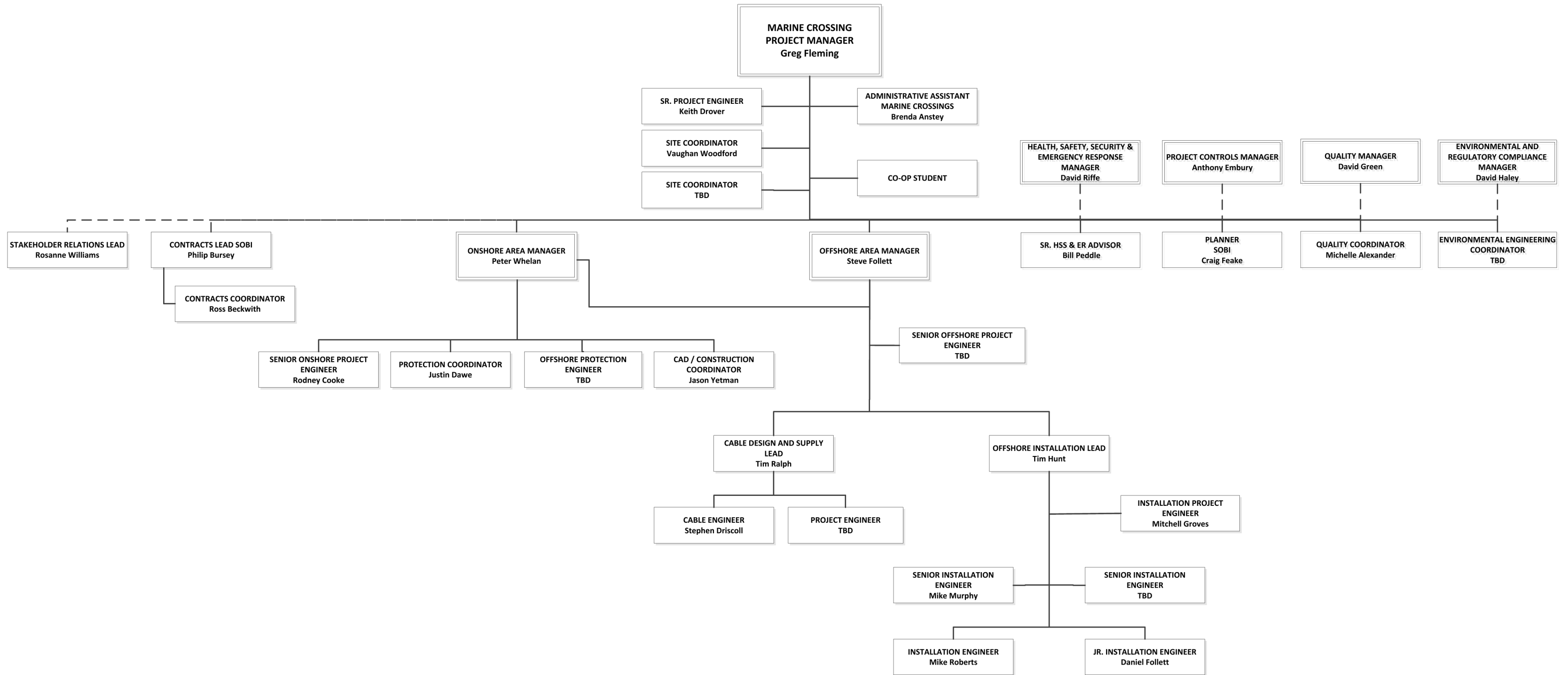
REPORTING LEGEND

— Direct Management Reporting Line

- - - Indirect Reporting Line

Lower Churchill Project

Chart LCP5: SOBI Marine Crossing Project Delivery Team

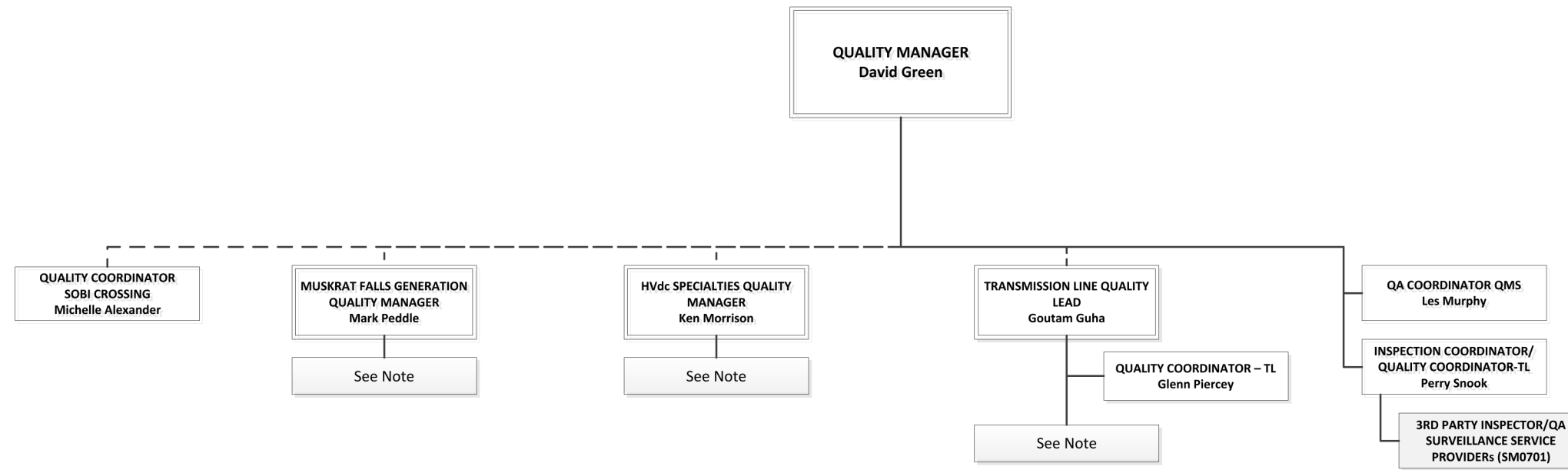


REPORTING LEGEND

— Direct Management Reporting Line

- - Indirect Reporting Line

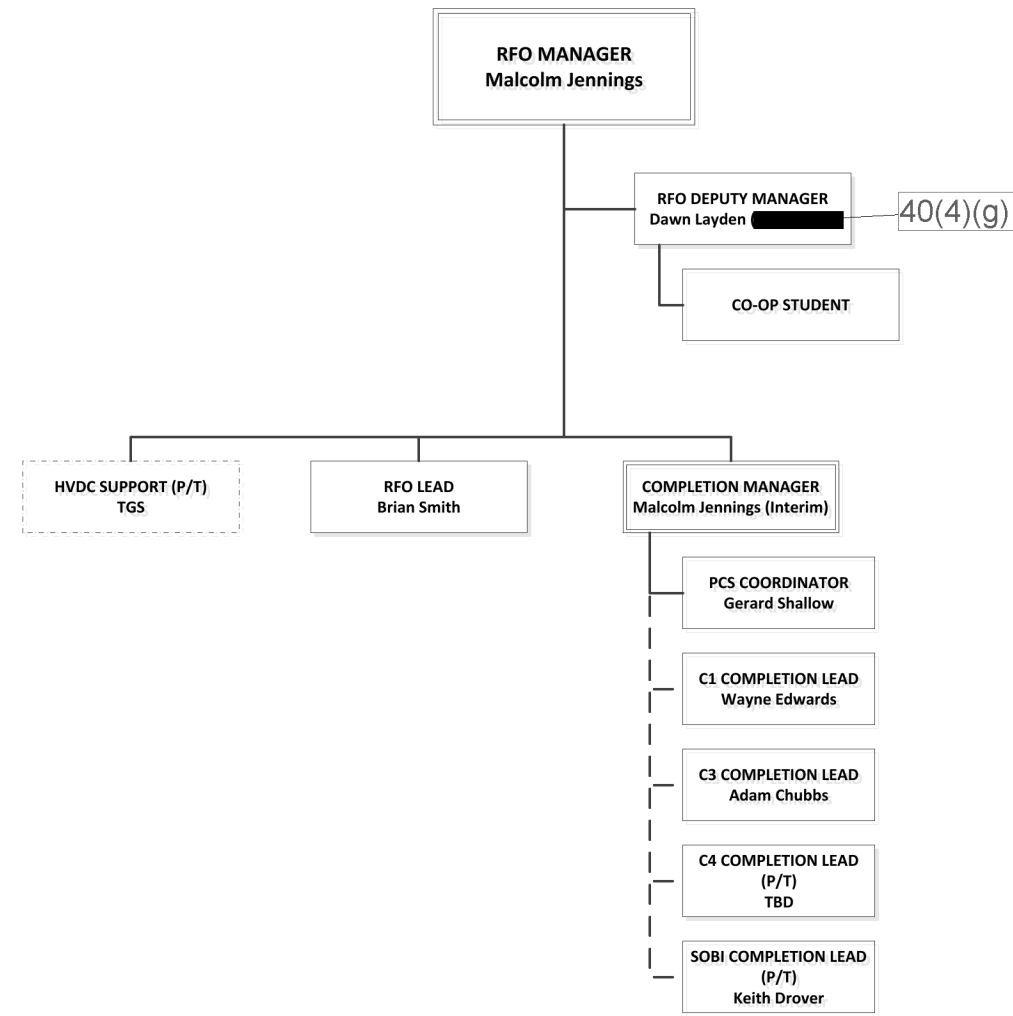
Chart LCP6: Quality Management Functional Organization



Note: Functional reports are shown on charts LCP2, LCP3 and LCP4

Lower Churchill Project

Chart LCP7: Ready for Operation (RFO) Team



 Service Contract

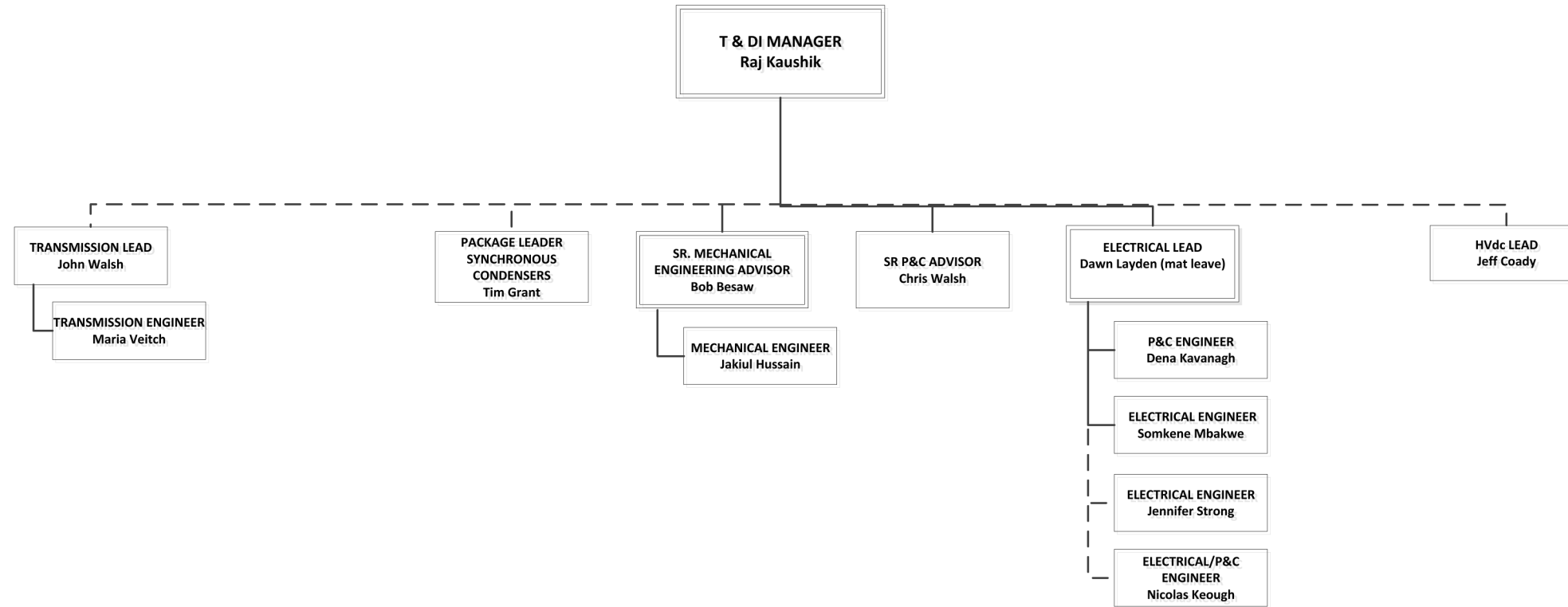
REPORTING LEGEND

— Direct Management Reporting Line

- - Indirect Reporting Line

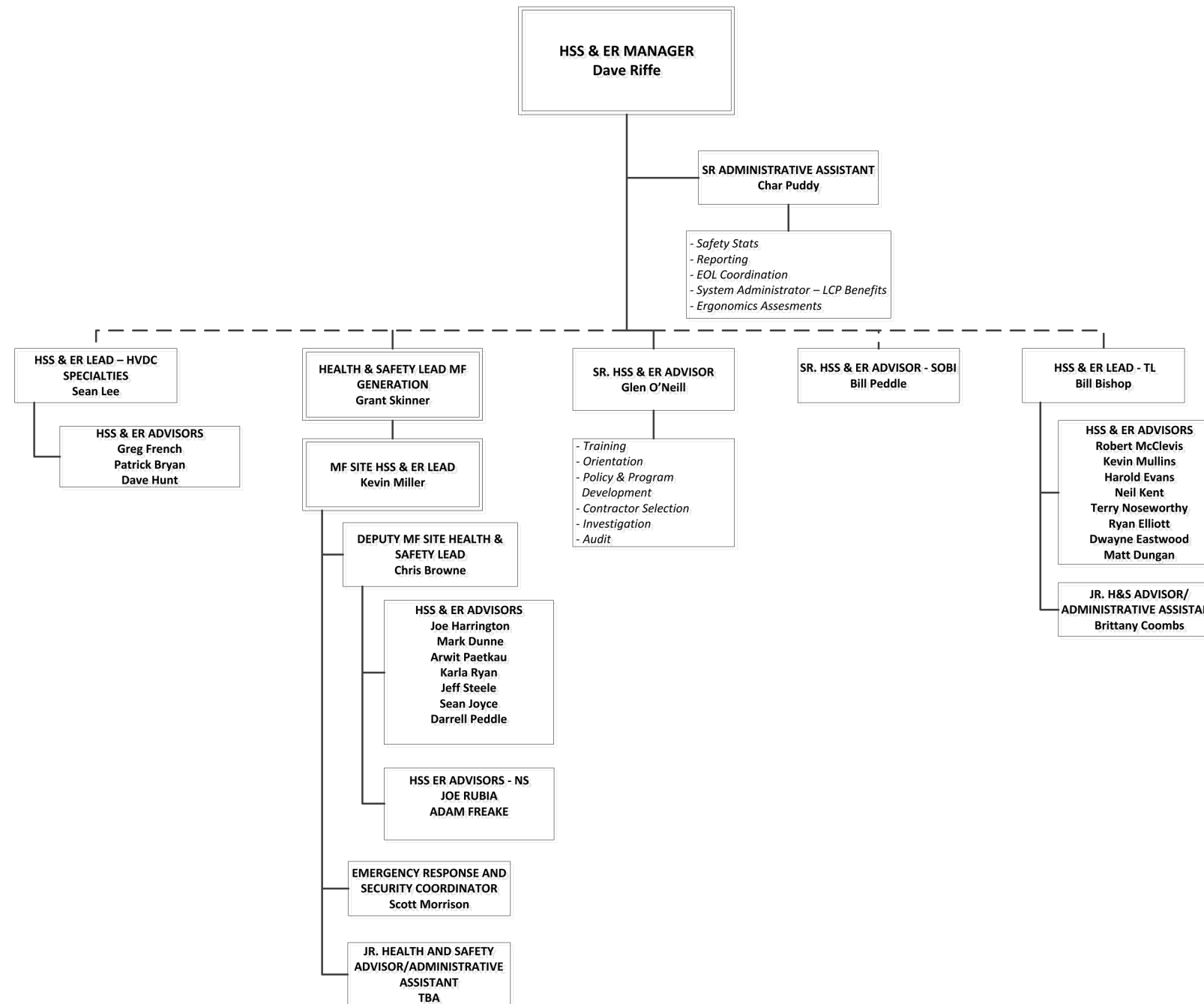
8

Chart LCP8: Technical & Design Integrity Team



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Chart LCP9: Health, Safety, Security and Emergency Response (HSS & ER) Functional Organization



REPORTING LEGEND

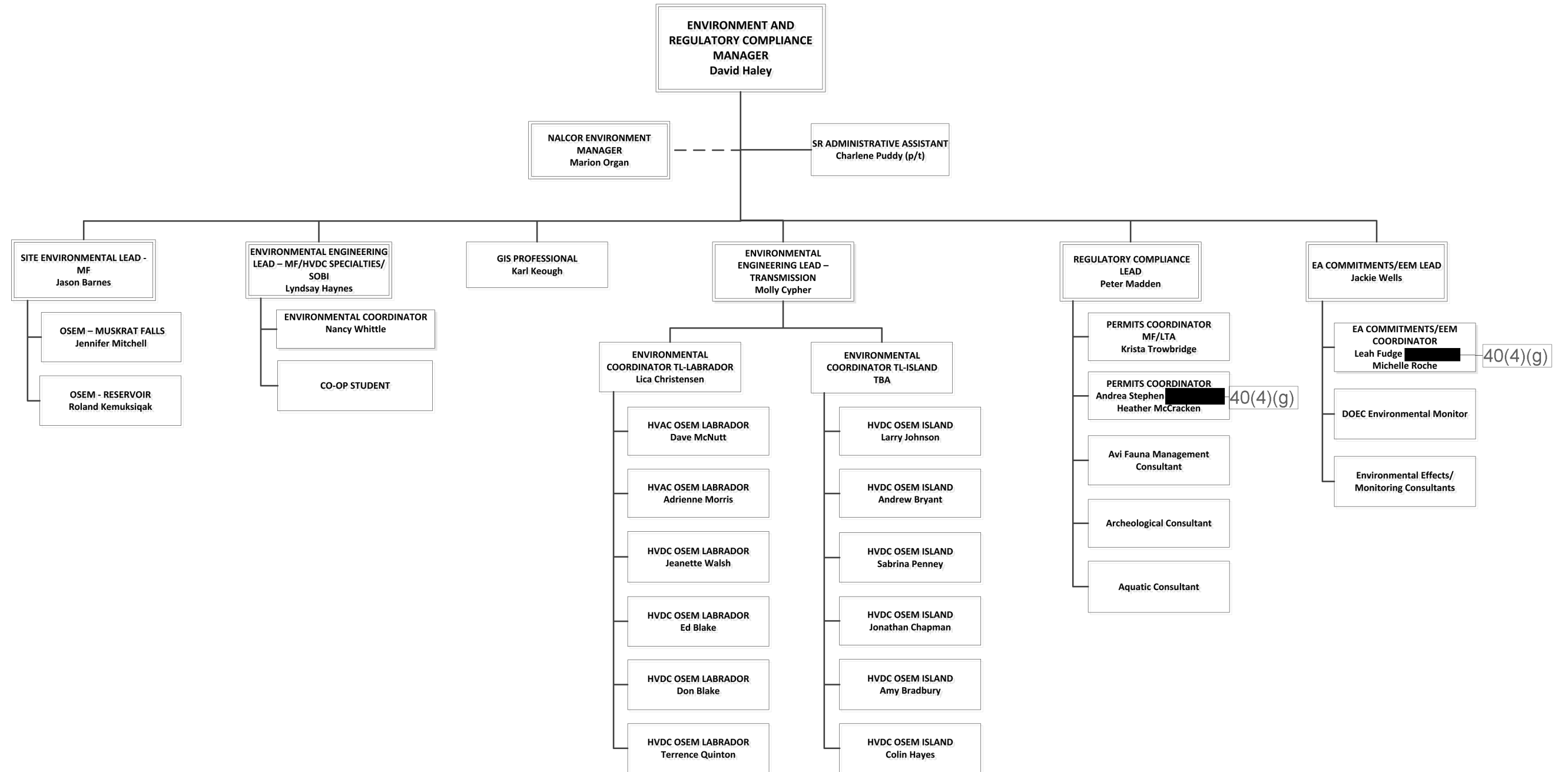
— Direct Management Reporting Line

- - Indirect Reporting Line

10

Lower Churchill Project

Chart LCP10: Environment and Regulatory Compliance Functional Organization

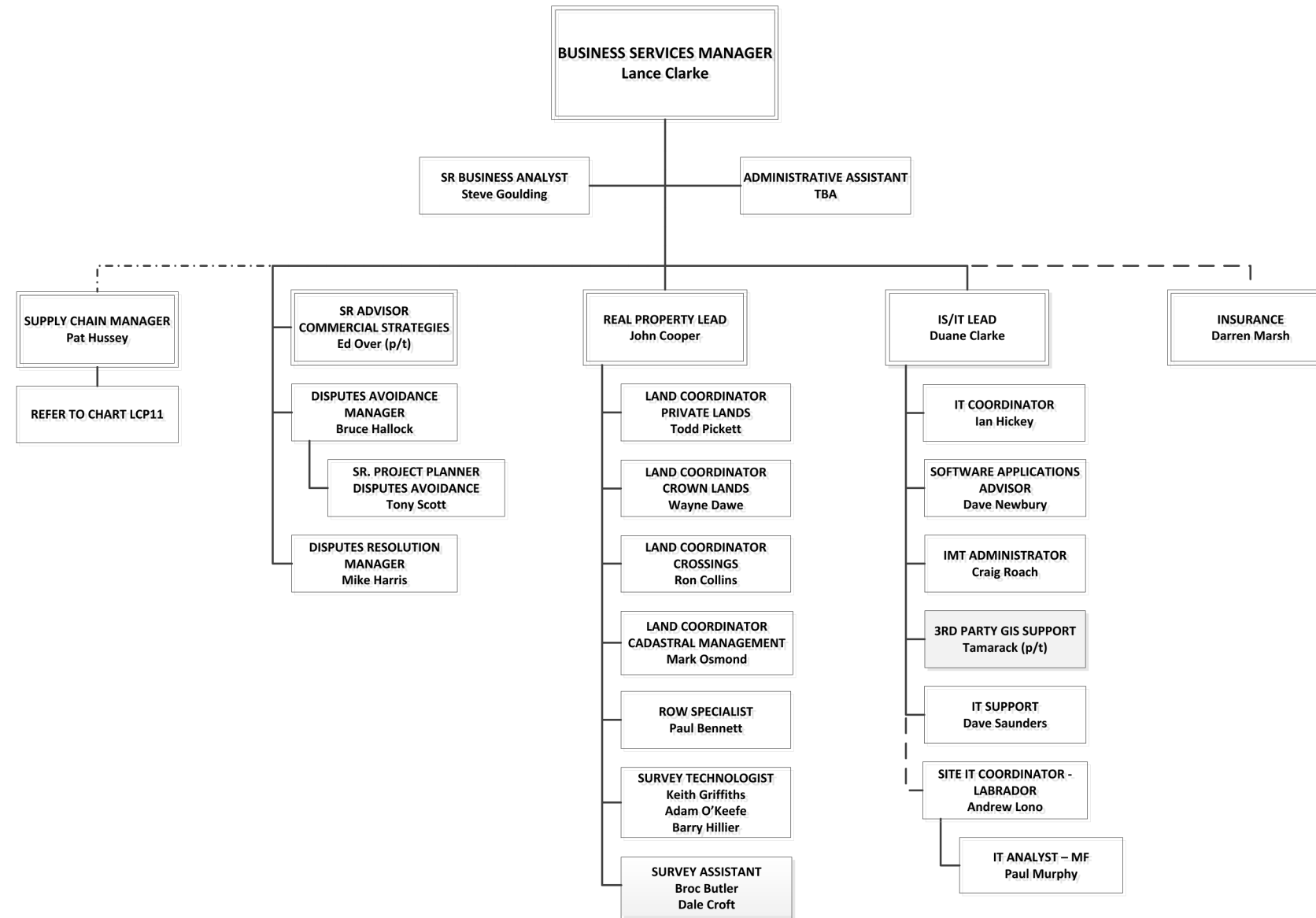


REPORTING LEGEND

— Direct Management Reporting Line

- - Indirect Reporting Line

Chart LCP11: Business Services Functional Organization



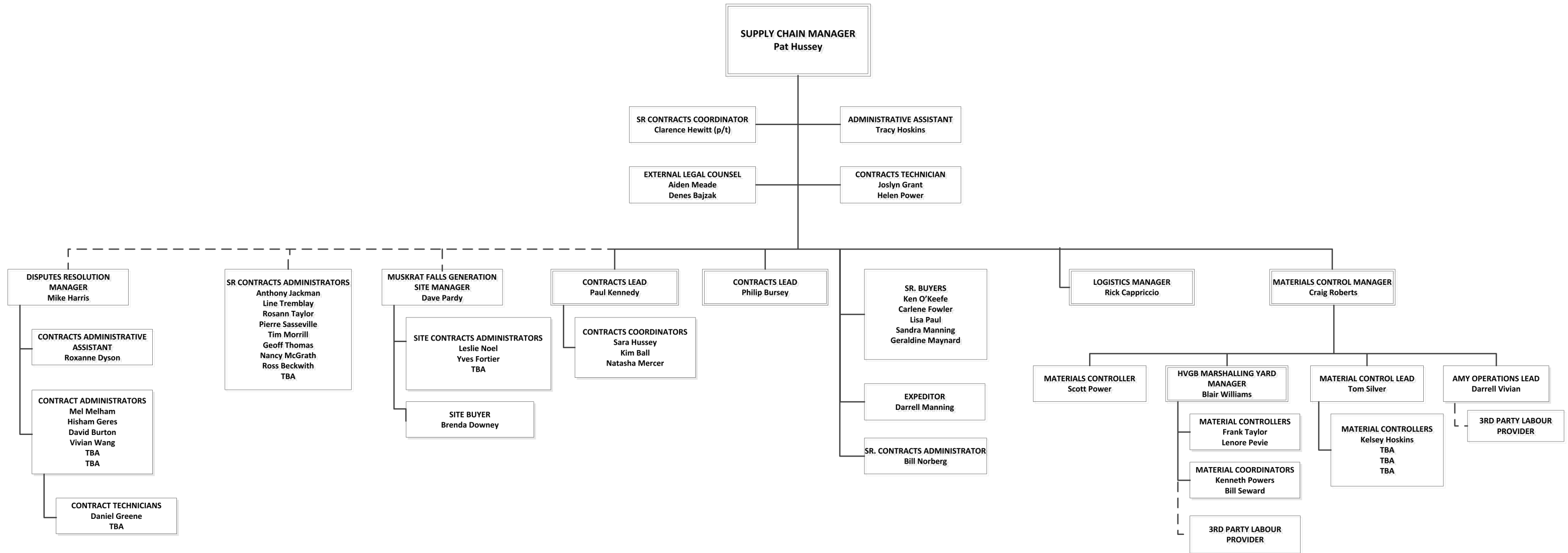
REPORTING LEGEND

— Direct Management Reporting Line

- - Indirect Reporting Line

Lower Churchill Project

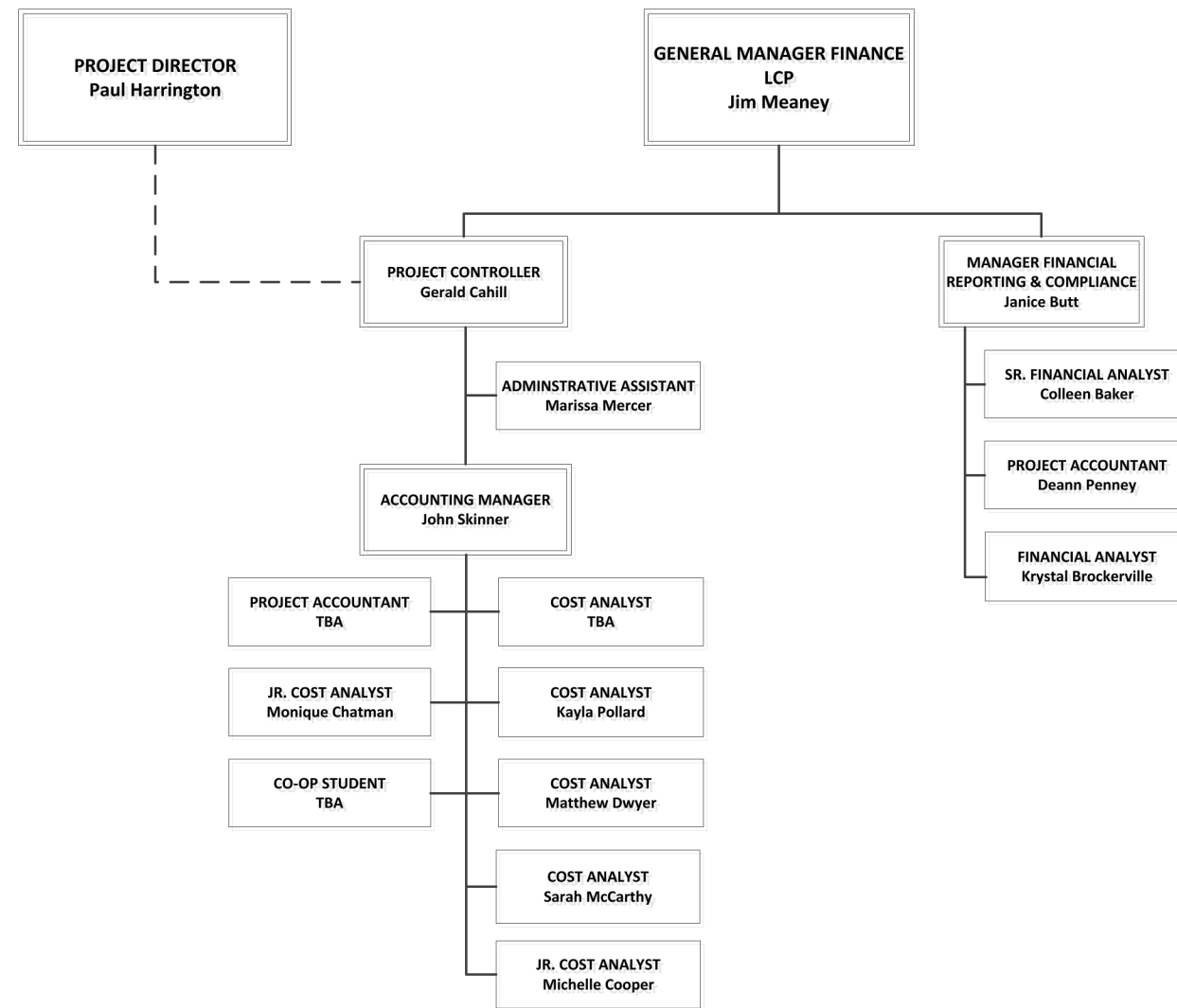
Chart LCP12: Supply Chain Management Functional Organization



REPORTING LEGEND
 — Direct Management Reporting Line
 - - Indirect Reporting Line

Lower Churchill Project

Chart LCP13: Finance Functional Organization

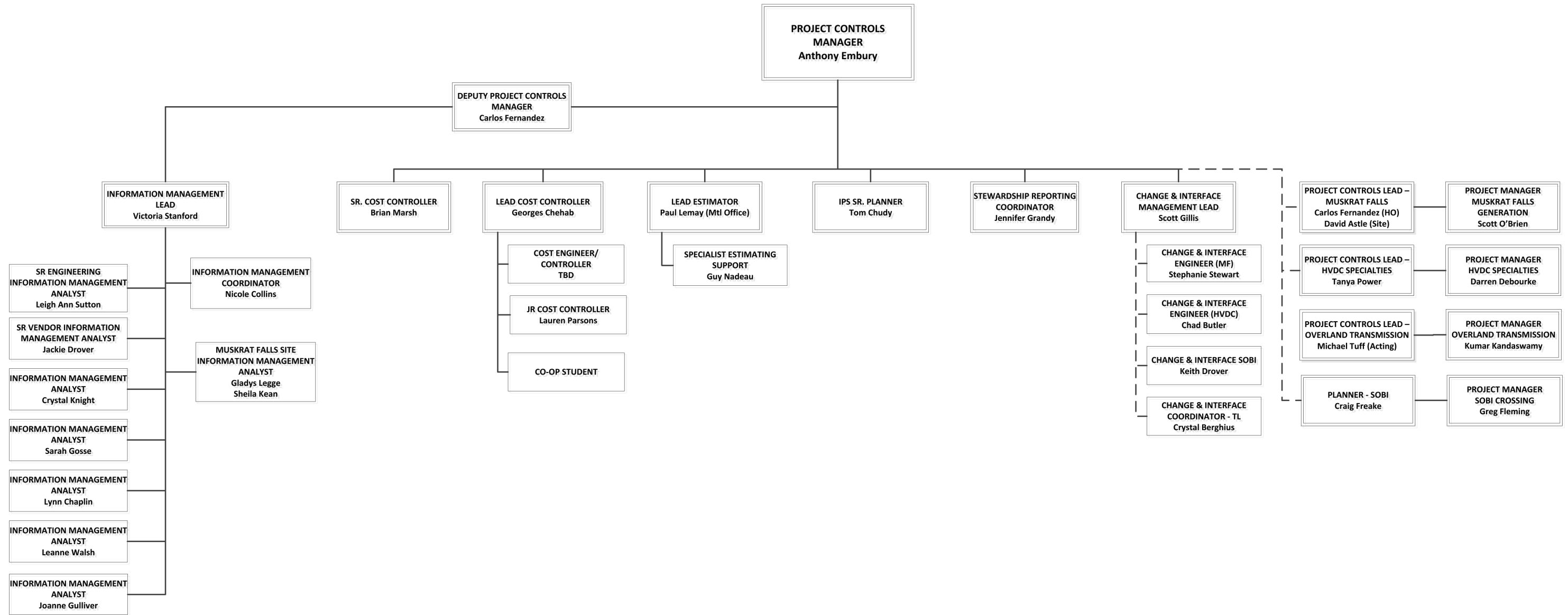


REPORTING LEGEND

- Direct Management Reporting Line
- - Indirect Reporting Line

Lower Churchill Project

Chart LCP14: Project Controls Functional Organization



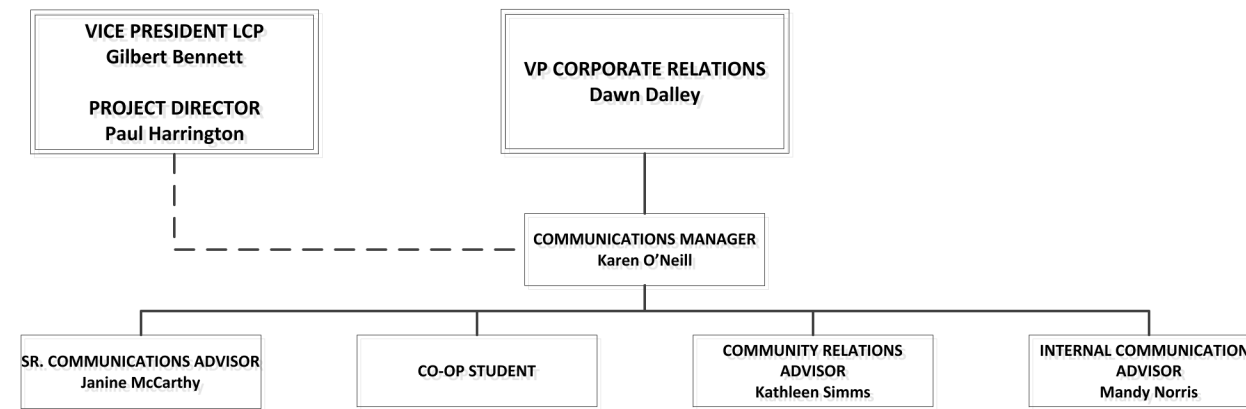
REPORTING LEGEND

— Direct Management Reporting Line

- - Indirect Reporting Line

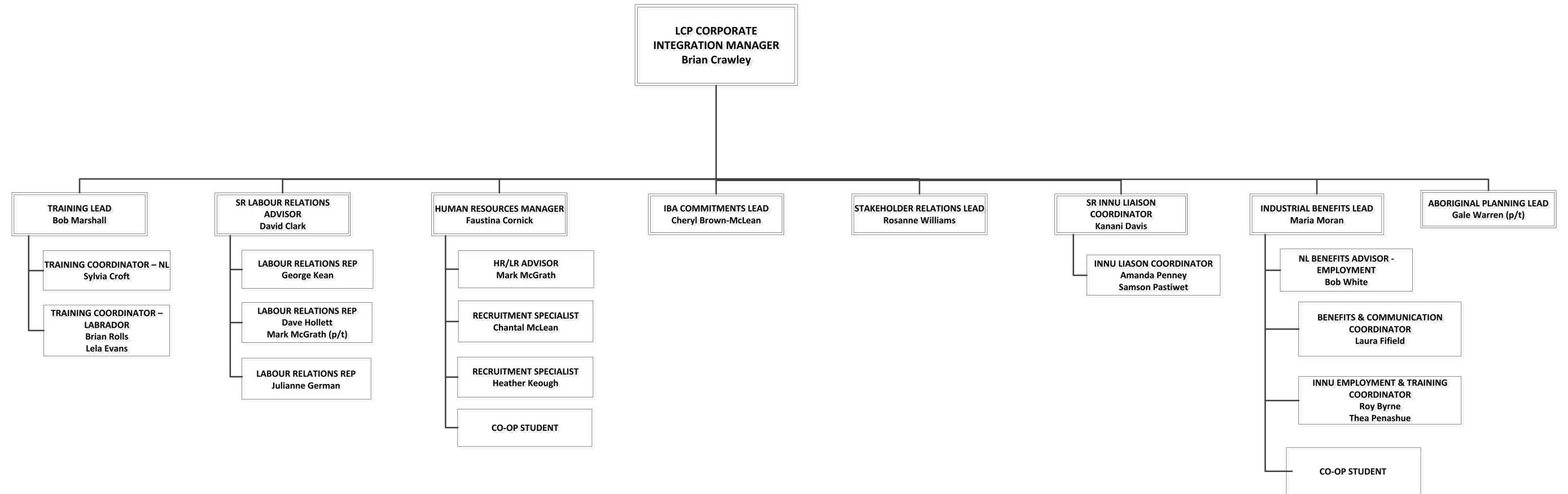
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Chart LCP15: Communications Team



Lower Churchill Project

Chart LCP16: People Relations Team



REPORTING LEGEND

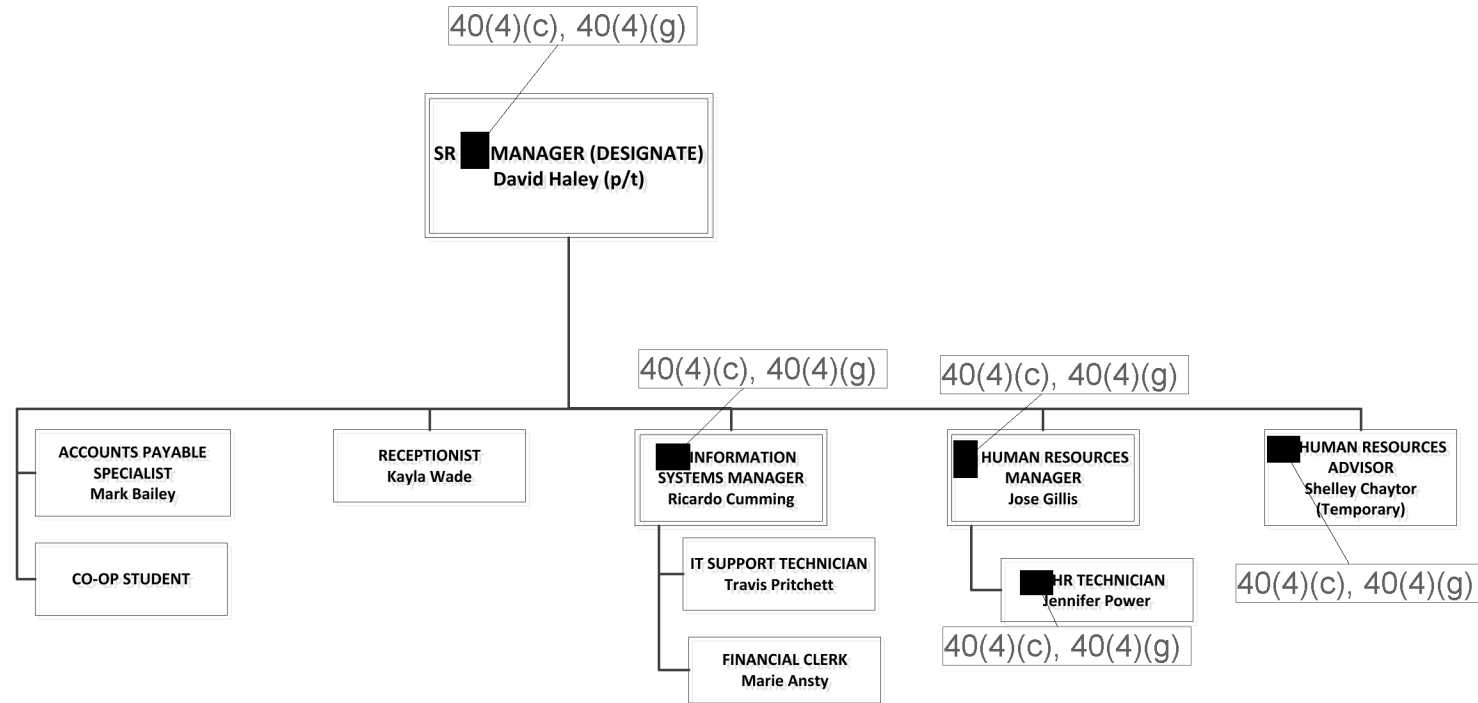
— Direct Management Reporting Line

- - Indirect Reporting Line

Lower Churchill Project

Chart LCP17: Office Administration, Human Resources & IT Services

40(4)(c), 40(4)(g)



REPORTING LEGEND

- Direct Management Reporting Line
- - Functional Reporting Line

APPENDIX B

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Aboriginal Planning Lead	Warren	Gale		1	
Accounting Manager	Skinner	John		1	
Accounts Payable Specialist	Bailey	Mark	1		
Admin Assistant/Office Services Supervisor	Sutton	Colleen		1	
Administrative Assistant	Ansty	Brenda		1	
	Hoskins	Tracey		1	
	LeRoux	Trina	1		
	Mercer	Marissa			1
	Murray	Valerie	1		
	Rumbolt	Doreen			1
Administrative Assistant - HVdc TL	Locke	Nova			1
	Walsh	Sharon			1
Area Construction Coordinator - Churchill Falls	Byrne	Dennis			1
Area Construction Coordinator - Muskrat Falls	Struge	Peter			1
Area Construction Coordinator - Soldiers Pond	Greening	Robert	1		
Area Construction Manager - Churchill Falls	Samson	Donald			1
Area Construction Manager - HVAC	Hacker	Allan	1		
Area Construction Manager - HVDC TL Labrador	Lever	Dennis	1		
Area Construction Manager - Muskrat Falls	Lewis	Donald			1
Area Construction Manager - North Spur	Turpin	Mark			1
Area Construction Manager - ROW (Island)	Evans	Bill	1		
Area Construction Manager Powerhouse/Spillway	Tsekouras	Peter	1		
Area Construction Manager ROW (Labrador)	Armstrong	Bruce			1
Area Constructor Manager- Soldiers Pond	Boote	Patrick			1
Area Engineer Mechanical	Koob	Randy	1		
Area Manager - HVAC TL	Parmar	Snehal			1
Area Manager - HVdc TL	Healey	Keenan	1		
Area Manager - Mechanical & Electrical	Gillespie	Frank	1		
Area Manager AC Substations	Ellis	Mark	1		

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Area Manager Clearing and Access	Sparkes	Ken		1	
Area Manager Converters and Transition Compounds	Almon	Ken			1
Area Manager River Management/Habitat/Site Restoration	McLean	Clyde	1		
Area Manager Synchronous Condensers and Electrodes	Stanski	Devin			1
Area Manager System Integration/Telecoms	Winsor	Glenn		1	
Benefits & Communication Coordinator	Fifield	Laura		1	
Business Services Manager	Clarke	Lance	1		
Buyer	Downey	Brenda			1
Cable Design and Supply Lead	Ralph	Tim			1
Cable Engineer	Driscoll	Stephen			1
CAD Construction Coordinator	Yetman	Jason			1
CAD Technician	Russell	Chris	1		
Change & Technical Interface Engineer	Butler	Chad			1
	Stewart	Stephanie	1		
Change & Technical Interface Specialist	Berghuis	Crystal			1
Change Management & Interface Lead	Gillis	Scott			1
Civil Construction Monitor	Babstock	Glen	1		
	Bessey	James			1
	Button	Michael			1
	O'Grady	Kyle			1
	Rideout	Scott			1
	Turnbull	Rodney			1
	Wall	Garrett			1
Civil Engineering Lead	McNiven	Blair			1
Communications Advisor	Norris	Mandy		1	
Communications Manager	O'Neill	Karen		1	
Community Relations Advisor	Simms	Kathleen		1	
Completions Lead MF Generation	Edwards	Wayne			1
Construction Advisor	Butt	Des			1
	Mulcahy	John			1
Construction Coordinator	Andrew	William Glenn			1
	Best	Wade			1

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
	Felhazi	Richard			1
	Himmelman	Andrew			1
	Kercher	Terry			1
	McClarty	Mitch			1
	Stein	Stan			1
	Suley	John			1
Construction Manager HVdc Specialties	Butler	Ray	1		
Construction Monitor	Thibeault	Pierre	1		
Contract Technician	Greene	Daniel			1
Contracts Administrative Assistant	Dyson	Roxanne			1
Contracts Administrator	Beckwith	Ross	1		
	Burton	David			1
	Geres	Hisham	1		
	Melhem	Mel	1		
	Sasseville	Pierre	1		
	Thomas	Geoff	1		
	Wang	Vivian			1
Contracts Coordinator	Ball	Kimberly		1	
	Hussey	Sara			1
	Mercer	Natasha			1
Contracts Lead	Burse	Philip	1		
	Kennedy	Paul	1		
Contracts Technician	Grant	Joslyn	1		
	Osmond	Christa			1
Cost Analyst	Chatman	Monique			1
	Dwyer	Matthew			1
	McCarthy	Sarah			1
	Pollard	Kayla			1
Cost Controller	Batten	Amanda	1		
	Powers	Lisa			1
Data Cost Analyst	Lacey	Devin	1		
Deputy General Project Manager	Bush	Ed	1		

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
	Kean	Jason	1		
Deputy HSS & ER Lead	Browne	Chris	1		
Deputy Laboratory Supervisor	Biega	Tim	1		
Deputy Lead Surveyor	Leighton	Shelly			1
Deputy Project Manager	Woolgar	Robert			1
Deputy Project Manager - HVdc Specialties	Troke	Trina	1		
Dispute Avoidance Manager	Hallock	Bruce	1		
Dispute Resolution Manager	Harris	Michael	1		
Drafting Support	Zessi	Oliver	1		
EA Commitments/EEM Coordinator	Roche	Michele		1	
EA Commitments/EEM Lead	Wells	Jackie		1	
Electrical / P&C Engineer	Keough	Nick		1	
Electrical Engineer	Mbakwe	Somekene		1	
	Peddle	Matthew			1
	Strong	Jennifer		1	
Electrical Engineer Auxiliaries	Gagnon	Dennis	1		
Electrical Engineer Controls & Protection	Gagnon	Antoine	1		
Electrical Engineering Lead	Chavez	Luis	1		
Electrical Lead	Layden	Dawn		1	
Electrical Services	Clark	Gord	1		
	Vien	Marc	1		
Electrical Technologist	Noseworthy	Robert	1		
Emergency Response & Security Coordinator	Morrison	Scott	1		
Engineering Deliverables Coordinator	Power	Sherry			1
Engineering Manager	Saltan	Gokhan	1		
	Snyder	Greg	1		
Environment & Regulatory Compliance Manager	Haley	David	1		
Environmental Coordinator	Whittle	Nancy			1
Environmental Coordinator - Labrador TL	Christensen	Lica			1
Environmental Engineering Lead	Hynes	Lyndsay			1
Environmental Engineering Lead - Transmission	Cypher	Molly			1
Environmental Monitor	Mitchell	Jennifer			1

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Estimator	Lemay	Paul	1		
	Nadeau	Guy	1		
	Senn	Michael	1		
Expeditor	Manning	Darrell			1
External Legal Counsel	Bajzak	Denes	1		
	Meade	Aiden	1		
Field Engineer	Asokan	Ajanthan			1
	Boran	Nazmi	1		
	Butt	Ian			1
	Hossain	Awlad			1
	Joseph	Leo			1
	Mercer	David			1
	Saleem	Mohameed	1		
Financial Analyst	Brockerville	Krystal		1	
Financial Clerk	Ansty	Marie	1		
Fleet Coordinator	Fifield	Rod			1
General Manager Finance	Meaney	James		1	
General Project Manager	Power	Ron	1		
Geologist	Kar	Abir	1		
GIS Professional	Keough	Karl	1		
GIS Specialist	Roberts	Stephen	1		
H&S Advisor - Reservoir Clearing	Noseworthy	Terry			1
Health & Safety Advisor	Bryan	Patrick			1
	Dunne	Mark	1		
	French	Greg			1
	Harrington	Joseph	1		
	Hunt	David			1
	Joyce	Sean			1
	Paetkau	Arwit	1		
	Peddle	Darrell			1
	Ryan	Karla			1
Steele	Jeff			1	

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Health & Safety Lead	Skinner	Grant			1
HR/LR Advisor	McGrath	Mark		1	
HSS & ER Advisor	Dungan	Matt			1
	Eastwood	Dwayne			1
	Elliott	Ryan			1
	Evans	Harold	1		
	Kent	Neil			1
	McClevis	Robert			1
	Miller	Kevin	1		
	Mullins	Kevin	1		
HSS & ER Lead	Bishop	William	1		
	Lee	Sean	1		
HSS & ER Manager	Riffe	David			1
Human Resources Advisor	Chaytor	Shelley	1		
Human Resources Manager	Cornick	Faustina	1		
IBA Commitments Lead	McLean	Cheryl		1	
IMT Administrator	Roach	Craig			1
Industrial Benefits Lead	Moran	Moria		1	
Information Management Analyst	Chaplin	Lynn	1		
	Gosse	Sarah			1
	Gulliver	Joanne			1
	Kean	Sheila			1
	Knight	Crystal			1
	Legge	Gladys			1
	Walsh	Leanne			1
Information Management Coordinator	Collins	Nicole			1
Information Management Lead	Stanford	Victoria		1	
Information Systems Manager	Cumming	Ricardo	1		
Innu Liaison Coordinator	Pastiwet	Samson		1	
	Penney	Amanda		1	
Inspection Coordinator	Snook	Perry			1
Inspector	Acreman	Neil			1

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
	Beckett	Paul	1		
	Edmunds	James			1
	O'Keefe	Kyle			1
	O'Keefe	Peter			1
	Tobin	Robert	1		
	Wilson	Gerard			1
	Cole	Jonathan			1
	Pottle	Mark			1
Installation Engineer	Roberts	Michael	1		
Installation Project Engineer	Groves	Mitchell			1
Insurance	Marsh	Darren		1	
Intermediate Engineer Transmission Lines	Aybars	Baris	1		
Intermediate Tower Design Engineer	Yahiaoui	Abdeallah	1		
Innu Employment & Training Coordinator	Byrne	Roy		1	
	Penashue	Thea		1	
IPS SR. Planner	Chudy	Tom			1
IS/IT Lead	Clarke	Duane			1
IT Analyst	Murphy	Paul			1
IT Coordinator	Lono	Andrew		1	
	Hickey	Ian		1	
IT Support	Pritchell	Travis	1		
IT Support / Day to Day Operations	Saunders	Dave	1		
JR HSS & ER Advisor/Admin Assistant	Coombs	Brittany			1
Jr. Contracts Admin/Cost Analyst	Power	Helen			1
JR. Package EIT	Vithuranan	Jeyachandra		1	
Junior Cost Analyst	Cooper	Michelle			1
	Gregory	Brandon			1
Junior Cost Controller	Parsons	Lauren			1
Junior Installation Engineer	Follett	Daniel	1		
Laboratory Supervisor	Hassanein	Tayseer	1		
Labour Relations Rep	Hollett	David			1
	Kean	George			1

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Labrador Material Yard Manager	Williams	Blair			1
Land Coordinator Cadastral Management	Osmond	Mark			1
Land Coordinator Crossings	Collins	Ron			1
Land Coordinator Crown Lands	Dawe	Wayne			1
Land Coordinator Private Lands	Pickett	Todd			1
LCP Corporate Interface Manager	Crawley	Brian	1		
Lead Civil Engineer	Karem	Ayad			1
Lead Cost Controller	Chehab	George	1		
Lead Electrical	Pike	Leonard			1
Lead Engineer Foundations	Petal	Mahendra	1		
Lead Engineer Towers	Khan	Shahid	1		
Lead Engineer Transmission Lines	Meziane	Mourad	1		
Lead Mechanical	Trillo	Ramiro	1		
Lead Site Planner	Gouthro	John			1
Lead Surveyor	Slade	Ralph			1
Logistics Manager	Caporiccio	Rick	1		
Maintenance Supervisor	Efford	Dale			1
	Hodgson	Leonard			1
Manager - Civil Coordination	Collins	Mike			1
Manager Financial Reporting & Compliance	Butt	Janice		1	
Materials Control Lead	Silver	Tom			1
Materials Control Manager	Roberts	Craig	1		
Materials Controller	Power	Scott			1
Materials Coordinator	Powers	Kenneth	1		
	Seaward	Bill			1
	Taylor	Frank			1
Mechanical EIT	Rumbolt	Stephen	1		
Mechanical Engineer	Hussain	Jakiul		1	
MF Generation Cost Controller	Hawkins	Jill	1		
MF Site Environmental Lead	Barnes	Jason	1		
MF Site Manager	Pardy	Dave			1
Muskrat Falls Site Deputy Manager	Healey	Dave	1		

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Nalcor Environment Manager	Organ	Marion		1	
NL Benefits Advisor - Employment	White	Bob		1	
North Spur/DAMS Coordinator	Horwood	Grant	1		
NS Geotechnical Engineer	Caballos	Alvaro	1		
	Larrivee	Sonia	1		
NS Health & Safety Advisor	Rubia	Joseph			1
NS Health and Safety Advisor	Freake	Adam			1
NS Quality Advisor/Lab Supervisor	Cobo	Juan Hiedra			1
Office Administrator - Marshalling Yard	Winsor	Rhonda			1
Offshore Area Manager	Follett	Stephen	1		
Offshore Installation Lead	Hunt	Tim			1
On Site Environmental Monitor	Blake	Donald	1		
	Blake	Edward			1
	Bradbury	Amy			1
	Bryant	Andrew			1
	Chapman	Jonathan	1		
	Hayes	Colin			1
	Johnston	Larry			1
	McNutt	David	1		
	Morris	Adrienne			1
	Quinton	Terrance	1		
	Walsh	Jeanette			1
On Site Environmental Monitor Reservoir	Kamuksiqak	Roland	1		
Onshore Area Manager	Whelan	Peter	1		
P&C Engineer	Kavanagh	Dena		1	
P&C Engineering Lead	Quijada	Ricardo	1		
Package EIT	Payne	Vincent			1
Package Engineer	El Bensi	Abdellah	1		
	Islam	Sheikl	1		
	Mosser	Andre	1		
	O'Keefe	Michael	1		
	Rossy	Timothy	1		

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
	Shenoy	Shiva	1		
	Tobin	Samantha		1	
	Trica	Alexandre	1		
Package Engineer - Electrical	Slade	Jim			1
Package Engineer - HVdc Access Coordination	Murphy	Russell			1
Package Engineer Construction	Vitch	Maria		1	
Package Engineer Construction Power	Haines	Gordon	1		
Package Engineer Mechanical	Mitchelmore	Albert			1
Package Engineer Transformers	Chubbs	Adam			1
Package Leader	Coady	Jeff		1	
	Grant	Tim		1	
Package Leader - Balance of Plant	Wright	David			1
Package Leader AC Rebuilds & Outage Planning	Walsh	John		1	
Package Leader Hydro Mechanical Equipment	Drover	Bruce	1		
Package Leader River Management	Hiscock	Julia		1	
Package Leader Substations	Crane	Steven			1
Package Leader Turbines and Generator	Severs	Richard			1
PCS Coordinator	Shallow	Gerald			1
Permits Coordinator	McCracken	Heather	1		
	Trowbridge	Krista	1		
Planner	Moriarity	Lynn			1
Planner SOBI	Freake	Craig			1
Project Accountant	Penney	Deann			1
Project Control Lead	Astle	David			1
Project Controller	Cahill	Gerald	1		
Project Controls Coordinator - Construction	Davis	Gary			1
Project Controls Lead	Aucoin	Paul	1		
	Tuff	Mike			1
Project Controls Lead - HVDC Specialties	Power	Tanya	1		
Project Controls Manager	Embury	Anthony	1		
	Fernandez	Carlos	1		
Project Coordinator	Sullivan	Shannon			1

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Project Director	Harrington	Paul	1		
Project Engineer	Porter	Evan			1
	Rogers	Kris		1	
Project Manager HVdc Specialties	Debourke	Darren	1		
Project Manager Muskrat Falls Generation	O'Brien	Scott	1		
Project Manager- Overland Transmission	Kandaswamy	Kumar	1		
Project Manager SOBI Crossing	Fleming	Greg	1		
Project Manager TL267	Tucker	Kyle		1	
Protection & Control Engineer	Walsh	A. Chris	1		
Protection Coordinator	Dawe	Justin			1
PST Engineering	Couturier	Francois	1		
QA Survey Support	Hillier	Barry			1
QA Survey Support	Griffiths	Keith			1
QA Survey Support (Lead)	O'Keefe	Adam			1
QC Inspector	Baxter	Lee			1
	Bonnington	Jordan			1
	Flynn	Eugene			1
	Hopkins	Chris			1
	Organ	Brian			1
	Parrott	David			1
	Pinacate	Joel			1
	Reid	Rex			1
	Ryan	Clifford			1
	Ryan	Jonathan			1
	Snelgrove	Terrence			1
Snow	Paul			1	
Quality Advisor	Allaire	Frank	1		
	Andrews	Zach		1	
	Gillard	Michael			1
	Woodland	Terry			1
Quality Assurance Lead Muskrat Falls	Bennett	Chris			1
Quality Coordinator	Alexander	Michelle			1

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
	Carter	Ned			1
	Fraser	Paul	1		
	Piercey	Glenn	1		
Quality Lead - TL Construction	Guha	Goutham			1
Quality Lead China	Zhang	Franklin			1
Quality Management Systems Coordinator	Murphy	Leslie			1
Quality Manager	Green	David	1		
	Morrison	Ken	1		
Quality Manager - MF Generation	Peddle	Mark	1		
Quantity Coordinator	Wight	Scott			1
Ready for Operations Lead	Smith	Brian			1
Ready for Operations Manager	Jennings	Malcolm	1		
Real Property Lead	Cooper	John		1	
Receptionist	Wade	Kayla	1		
Recruitment Specialist	Keough	Heather			1
	McLean	Chantal			1
Regulatory Compliance Lead	Madden	Peter		1	
Resident Engineer	Ferguson	Neil	1		
ROW Coordinator	Alward	Christopher			1
	Butler	Robert			1
	Carr	Alexander		1	
	Cashin	Cory			1
	Fudge	Woodrow	1		
	Gordon	Christopher			1
	Griffin	Chris			1
	Lingard	Merle			1
	McCallum	Shamus			1
	Oldford	Paul	1		
	Paul	Roy	1		
	Walsh	Kirk	1		
	Wicks	Colin	1		
Young	Shane			1	

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
ROW Specialist	Bennett	Paul	1		
Senior Administrative Assistant	Puddy	Charlene			1
Senior Business Analyst	Goulding	Steve	1		
Senior Civil Construction Monitor	Lewis	Gus			1
Senior Contracts Administrator	McGrath	Nancy			1
	Norberg	Bill			1
	Taylor	Rosann			1
	Tremblay	Line	1		
Senior Contracts Coordinator	Hewitt	Clarence	1		
Senior Electrical Engineer	Power	Geoff			1
Senior Installation Engineer	Murphy	Michael			1
Senior Labour Relations Advisor	Clark	David	1		
Senior Mechanical Engineer	Curl	Sarah			1
Senior Onshore Project Engineer	Cooke	Rodney			1
Senior P&C Engineer	Lopez	Jorge	1		
Senior Project Engineer	Drover	Keith	1		
Senior Technical Advisor	Raissi-Fard	Mostafa (Max)			1
Services Contract Administrator	Noel	Leslie			1
Services Contracts Administrator	Fortier	Yves			1
Shift Engineer	Cooper	Stephen	1		
	Heffern	Neil			1
	Kavanagh	Adam	1		
Site Administrative Assistant	Hoskins	Nadine	1		
Site Coordinator	Woodford	Vaughan	1		
Site Cost Engineer	Frassetto	Juliana			1
	Mulcahy	Peter			1
Site Engineering Geologist	Kar	Abir	1		
Site Materials Controller	Pevive	Lenore			1
	Vivian	Darrell			1
Site Materials Coordinator	Hoskins	Kelsey			1
Site Project Controls Coordinator	Evans	Michelle			1
	Hamlyn	Patrick	1		

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
	Hynes	Justin			1
Site Services Lead	Carbery	Fergus	1		
	Hoberg	Les	1		
SLI HR Manager	Gillis	Jose	1		
SLI HR Technician	Power	Jennifer	1		
Software Applications Advisor	Newbury	Dave			1
Special Project/Third Party Coordination Manager	Pellerin	Steve	1		
SR Buyer	Hefford-Fowler	Carlene			1
	Manning	Sandra			1
	Maynard	Geraldine			1
	O'Keefe	Ken			1
	Paul	Lisa			1
SR Civil Construction Monitor	Sweeney	Michael			1
SR Civil Engineer	Colpitts	Bruce	1		
SR Construction Engineer	O'Brien	Jason			1
SR Contracts Administrator	Jackman	Anthony			1
	Morrill	Tim	1		
SR Cost Controller	Marsh	Brian			1
SR Electrical Engineer	Dariani	Ali	1		
	Sheng	Yuan	1		
SR Engineer Transmission	Yang	Jixiang	1		
SR HSS & ER Advisor	O'Neill	Glen			1
	Peddle	Bill	1		
SR Innu Liaison Coordinator	Davis	Kanani	1		
SR Mechanical Engineer	Marshall	Shaun	1		
SR Planner - Muskrat Falls	Whitty	Andrew	1		
SR Structural/Architectural Technician	McCarthy	Charles	1		
SR Substation Designer	Ascencio	Ovidio	1		
SR Vendor Information Management Analyst	Drover	Jackie	1		
SR. Administrative Assistant	Wilson	Sherry	1		
Sr. Advisor Commercial Strategies	Over	Edward	1		
Sr. Communications Advisor	McCarthy	Janine		1	

POSITION	INDIVIDUAL		Contractor	Nalcor Employee	Recruitment Service Provider
Sr. Engineering Information Management Analyst	Sutton	Leigh Anne			1
Sr. Financial Analyst	Baker	Colleen		1	
Sr. Project Planner - Dispute Avoidance	Scott	Tony			1
Stakeholder Relations Lead	Williams	Rosanne		1	
Stewardship Reporting Coordinator	Grandy	Jennifer			1
Structural Designer	Camplin	Stephen	1		
Structural Engineer	Kazi	Enam	1		
	Smith	Todd	1		
Supply Chain Manager	Hussey	Pat	1		
Survey Assistant	Butler	Broc			1
	Croft	Dale			1
System Integration Lead Telecoms	Wareham	Keith			1
T&DI Manager	Kaushik	Raj		1	
TDI Mechanical Advisor	Besaw	Bob	1		
Telecoms Engineer	De Gonzague	Gilles	1		
Telecoms Lead	Nugent	Jim			1
Telecoms Specialist	O'Dell	Joseph	1		
Training Coordinator - Labrador	Evans	Lela			1
Training Coordinator - NL	Croft	Sylvia			1
Training Coordinator, Labrador	Rolls	Brian			1
Training Lead	Marshall	Bob			1
VP Corporate Relations	Dalley	Dawn		1	
VP Lower Churchill Project	Bennett	Gilbert		1	
Grand Total			180	55	233

Administrative Assistant	7
Air Resources Canada Ltd	1
Dovre Canada Group	2
Noramtec Consultants Inc.	2
NSB Energy	2
Advisor	3
Dovre Canada Group	2
NSB Energy	1
Buyer	7
Acquaint Contracting Services Inc.	2
NSB Energy	5
Construction Coordinator	10
Air Resources Canada Ltd	1
Networkers International (Canada) Inc.	1
NSB Energy	1
Project Talent Acquisition Group Inc.	7
Construction Monitor	8
Acquaint Contracting Services Inc.	1
Dovre Canada Group	2
NSB Energy	4
Tiller Engineering	1
Contracts Administrator	8
Air Resources Canada Ltd	1
Dovre Canada Group	2
Noramtec Consultants Inc.	1
NSB Energy	2
Rider Hunt International (Alberta) Inc.	2
Contracts Support	5
Dovre Canada Group	2
NSB Energy	2
Project Talent Acquisition Group Inc.	1
Cost Analyst	7
Dovre Canada Group	4
NSB Energy	3
Cost Controller	3
NSB Energy	2
Upstream Solutions Inc.	1
Engineer	39
Acquaint Contracting Services Inc.	1
Air Resources Canada Ltd	1
Dovre Canada Group	10
Maderra Engineering Inc.	7
Noramtec Consultants Inc.	2

NSB Energy	13
Project Talent Acquisition Group Inc.	4
Upstream Solutions Inc.	1
Environmental Monitor/Coordinator	10
Air Resources Canada Ltd	1
Dovre Canada Group	1
Fircroft Canada	1
NSB Energy	7
Health & Safety Advisors/Leads	18
Acquaint Contracting Services Inc.	4
Air Resources Canada Ltd	4
Dovre Canada Group	1
Networkers International (Canada) Inc.	1
Noramtec Consultants Inc.	1
NSB Energy	4
Project Talent Acquisition Group Inc.	1
Upstream Solutions Inc.	2
HR/LR	4
Air Resources Canada Ltd	1
Fircroft Canada	1
Newfound Recruiting	1
NSB Energy	1
Information Management	8
Acquaint Contracting Services Inc.	1
Air Resources Canada Ltd	2
Dovre Canada Group	4
NSB Energy	1
Inspector	20
Acquaint Contracting Services Inc.	4
Dovre Canada Group	5
Newfound Recruiting	1
Noramtec Consultants Inc.	1
NSB Energy	5
Project Talent Acquisition Group Inc.	1
Tiller Engineering	3
IT Support	3
NSB Energy	3
Land Coordinator	4
Dovre Canada Group	4
Manager/Specialist	16
Acquaint Contracting Services Inc.	1
Dovre Canada Group	4
Networkers International (Canada) Inc.	2
Noramtec Consultants Inc.	1
NSB Energy	5
Project Talent Acquisition Group Inc.	1
Upstream Solutions Inc.	2

Materials Controller	3
Acquaint Contracting Services Inc.	1
NSB Energy	1
Upstream Solutions Inc.	1
Materials Coordinator	4
NSB Energy	4
Planner	4
Dovre Canada Group	1
Fircroft Canada	1
NSB Energy	2
Project Controls	9
Air Resources Canada Ltd	1
Dovre Canada Group	1
Maderra Engineering Inc.	2
Newfound Recruiting	1
NSB Energy	3
Project Talent Acquisition Group Inc.	1
Project Coordinator	3
Dovre Canada Group	2
Maderra Engineering Inc.	1
Quality Advisor/Lead/Coordinator	9
Air Resources Canada Ltd	1
Dovre Canada Group	1
Networkers International (Canada) Inc.	1
Newfound Recruiting	2
NSB Energy	2
Project Talent Acquisition Group Inc.	1
Upstream Solutions Inc.	1
ROW Coordinator	8
Acquaint Contracting Services Inc.	1
Noramtec Consultants Inc.	1
NSB Energy	6
Supervisor	2
NSB Energy	1
Project Talent Acquisition Group Inc.	1
Survey Support	7
Dovre Canada Group	3
Fircroft Canada	1
Maderra Engineering Inc.	1
Noramtec Consultants Inc.	1
NSB Energy	1
Training	4
Acquaint Contracting Services Inc.	1
Air Resources Canada Ltd	1
Maderra Engineering Inc.	1
Upstream Solutions Inc.	1
Grand Total	233

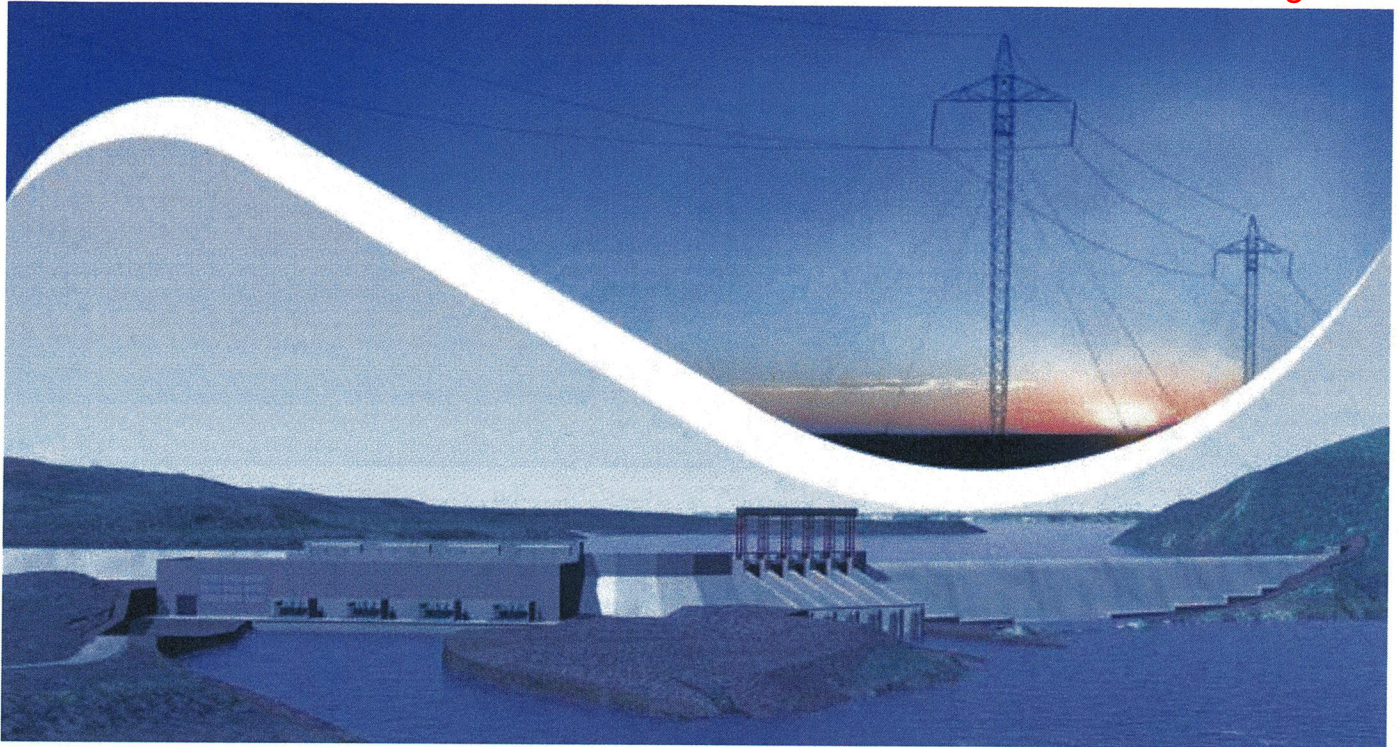
Appendix D

CIMFP Exhibit P-03965

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Positions Provided by Recruitment Agency	#	Min. Rate	Max. Rate
Administrative Assistant	7	197	455
Advisor	3	780	1,279
Buyer	7	602	1,015
Construction Coordinator	10	852	1,128
Construction Monitor	8	450	1,076
Contracts Administrator	8	764	1,429
Contracts Support	5	337	520
Cost Analyst	7	207	477
Cost Controller	3	329	1,065
Engineer	39	432	1,599
Environmental Monitor/Coordinator	10	426	883
Health & Safety Advisors/Leads	18	325	1,058
HR/LR	4	519	1,128
Information Management	8	368	809
Inspector	20	450	1,100
IT Support	3	523	1,128
Land Coordinator	4	1,002	1,033
Manager/Specialist	16	1,037	1,938
Materials Controller	3	675	1,050
Materials Coordinator	4	557	636
Planner	4	822	1,415
Project Controls	9	450	1,115
Project Coordinator	3	630	692
Quality Advisor/Lead/Coordinator	9	700	1,523
ROW Coordinator	8	704	863
Supervisor	2	810	857
Survey Support	7	377	967
Training	4	625	1,093

Recruitment Agency	2011	2012	2013	2014	2015	Total
Acquaint Contracting Services Inc.			1	5	11	17
Air Resources Canada Ltd	1		1	3	10	15
Dovre Canada Group	11	7	7	14	12	51
Fircroft Canada		1		2	1	4
Maderra Engineering Inc.		1	2	3	6	12
Networkers International (Canada) Inc.					5	5
Noramtec Consultants Inc.	2		1	3	4	10
NSB Energy	4	2	24	23	30	83
Project Talent Acquisition Group Inc.				9	12	21
Tiller Engineering				2	4	6
Upstream Solutions Inc.	1	1	1	2	4	9
Grand Total	19	12	37	66	99	233



Lower Churchill Project

Internal Audit Project # 15-22

Report Name : LCP Human Resources Audit

Person Responsible: [REDACTED]
Auditor: [REDACTED]
Audit Manager: [REDACTED] 40(1)

Date: February 18, 2016





AUDIT REPORT

Line of Business	Lower Churchill Project	
Department	Human Resources	
Audit	LCP Human Resources Audit	
Audit Risk Level	Medium	
Person Responsible	[REDACTED] – Human Resources Manager	40(1)
Copy		
Supervisor	[REDACTED] – LCP Corporate Integration Manager	40(1)
Auditor	[REDACTED]	
Audit Manager	[REDACTED]	40(1)

Executive Summary

An audit was conducted to assess the hiring process as well as the orientation processes implemented by the Human Resources (HR) function on the Lower Churchill Project (LCP).

Based on this audit, Internal Audit concluded that Human Resources is operating within a sound control environment within the Lower Churchill Project. One low risk issue was identified. This focused on missing documentation to confirm reference checks had occurred for a significant number of employees.

Please see attached audit report for further details on the audit program that was executed.

This audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing as developed by the Institute of Internal Auditors (IIA).

Objectives

This audit had two objectives:

- 1) To ensure that staff on the Lower Churchill Project are adequately qualified and experienced to fulfill the duties of their job descriptions.
- 2) To ensure that LCP HR Management is fulfilling its responsibility to introduce employees to the concepts of the Code of Conduct and Business Ethics Handbook, and the Respectful Workplace Standard.



Scope

In light of the objective(s); the following LCP Plan & Procedures and reviewed:

- i. Code of Conduct and Business Ethics Handbooks (LCP-PT-MD-0000-HR-SD-0003-01, Rev B1)
- ii. Lower Churchill Respectful Workplace Standard (LCP-PT-MD-0000-HR-SD-0002-01, Rev B2)
- iii. Project Delivery Team Organization Charts (LCP-PT-MD-0000-PM-CR-0001-01, Rev B6)
- iv. LCP Site Handbook (LCP-PT-MD-0000-HR-MN-0001-01 , Rev B1)

Additionally, a variety of scope descriptions, related resumes, and orientation documents were randomly sampled and examined.

Background

The main focus of this audit was assessing resumes for current employees against the relevant scope descriptions for their positions. The auditor randomly selected 25 positions from the Project Delivery Team Organization Charts for review. If this initial testing presented significant concerns, additional samples would be requested to determine if trends existed. As part of this testing, the auditor also confirmed that references were appropriately completed for the 25 positions.

After assessing the suitability of each employee in the sample for their respective position, a review of their documentation was conducted to ensure that they had been introduced to the Respectful Workplace Standard and the Code of Conduct. This included confirming formal sign off of the Code of Conduct were applicable (formal sign off has only been required since 2014).

The last aspect of the audit involved taking a small sample of complaints logged under the Respectful Workplace Standard. These complaints were then assessed to ensure that it fit the requirements of the Standard and that it was investigated and addressed in a timely manner.

Analysis

The Human Resources audit was performed by examining the following areas:

Hiring

As mentioned, 25 positions were sampled and tested. The results of this testing were largely positive. Of the 25 positions tested, 14 were deemed to exceed the position requirements; 7 met the position requirements, and 4 did not appear to meet the requirements but had a combination of skills and education that compensated for that.



An employee was defined as exceeding the scope description requirements if both their education and experience were at higher levels than what was included in the scope description. Employees who met the requirements simply had the relevant education and years of experience required.

The four individuals who did not appear to meet the requirements of the job description generally were lacking in either the required education or the required number of years of experience. Three of the employees classified as such did not have the required degree described in the education section of the scope description. However, two of these individuals had in excess of 20 years' experience while the other had 7 years' experience that related directly to the roles for which they were selected. The remaining individual clearly met the education requirements, but was lacking in total years of experience. However, the limited experience they did have was extremely specific and relevant to the role. Based on these additional competencies, no issues were noted with the hiring process or the suitability of the employees sampled for their particular role on the LCP.

Code of Conduct

All of the employees sampled had been adequately introduced to the Code of Conduct and Business Ethics Handbook. 12 of the 25 employees sampled had completed a formal sign off of the Code of Conduct and Business Ethics Handbook; acknowledging that they had read it and fully understood how it applied to them. This procedure was instituted in 2014. Prior to that time, it was not a requirement that employees complete a formal sign off of the Code. Testing identified 13 employees hired prior to this practice being implemented, and as such they had not completed a formal sign off of the Code of Conduct. However, it was confirmed through documentation (i.e. orientation session attendance sheets) that each of these employees was introduced to the Code of Conduct upon their hiring.

Respectful Workplace Standard

All of the employees sampled had been adequately introduced to the Respectful Workplace Standard. All of the 25 employees sampled had been introduced to the Standard through either Respectful Workplace Awareness sessions, new hire orientation, or formal sign off of the Code of Conduct and Business Ethics Handbook (which included a section on respect and dignity in the workplace).

A complaints register for complaints lodged under the Respectful Workplace Standard was also reviewed. A number of complaints were reviewed in detail with the Human Resources Manager. Each of the complaints appeared to fit the requirements laid out in the Standard; and they were handled in a timely manner as defined in the Standard.



Conclusion

It can be concluded that Human Resources is operating within a sound control environment within the Lower Churchill Project.

Final Comments

The Human Resources Management function on the Lower Churchill Project appears to have an adequate hiring process in place which leads to hiring individuals with a high degree of suitability for their relevant positions. Orientation processes with respect to the Code of Conduct and the Respectful Workplace Standard also appear to be functioning quite well. Lastly, complaints logged under the Respectful Workplace Standard appear to be well managed and addressed within an acceptable timeframe. The Audit Team would like to extend its thanks to the management and staff involved in this audit for their cooperation throughout the audit process. There was one low risk issue related to a lack of documentation related to the recruitment process, the details of which can be found in the attached issue report below.



AUDIT ISSUE REPORT

Line of Business	Lower Churchill Project	
Department	Human Resources	
Audit	LCP Human Resources Audit	
Audit Issue Risk Level	Low	
Person Responsible	[REDACTED]	Human Resources Manager 40(1)
Copy		
Supervisor	[REDACTED]	LCP Corporate Integration Manager 40(1)
Auditor	[REDACTED]	
Audit Manager	[REDACTED] 40(1)	

Issue #1

Issue Title: Lack of documentation to confirm reference checks have occurred

Risk Level: Low

Issue:

All employees hired to work on the Lower Churchill Project should be subjected to reference checks during the recruitment process. During audit testing, 25 employees were sampled and evidence of reference checks for these employees was requested from Human Resources. 4 employees from this sample were identified for which documentation could not be provided by Human Resources to confirm that they had been subjected to reference checks. A further 6 hires were known to management from past work experience on other projects. The 6 individuals were recommended for their positions by management; however these internal reference checks were not formally documented at the time. A formal process for hires that are known to management has since been established. A secondary reference for the potential hire in question is sought, and the LCP team member providing the reference must formally document it.

By conducting reference checks on potential employees during the recruiting process Human Resources is attempting to verify the experience, credentials, and overall suitability of the candidate for the position. While this appears to simply be a case of misplaced documentation, there is still a risk that these reference checks were not actually conducted, which could in turn lead to under-qualified employees being hired on the LCP.

Recommendation:

It is recommended that Human Resources address this issue by storing hard copies of all reference checks on site at the Torbay Road Office and by saving electronic copies of email confirmations of



reference checks. Procedures should also be implemented to ensure continuity of business and regular access to documents.

Information on this page has been redacted under s.40(1)



Re: Fw: Information

03/06/2014 12:20 PM

We are bringing [redacted] on the Project though PMX as a senior planner (under [redacted] org), that will make 4 people under PMX including [redacted]

[redacted] - Madera

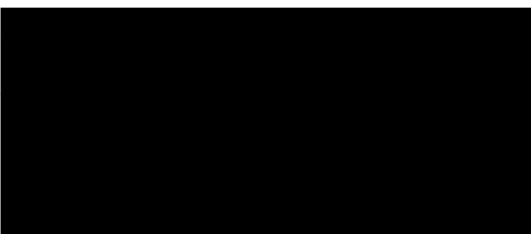
Newfound - all correct, except [redacted]. He was in the first Training Coordinator recruitment effort (we hired [redacted]. Currently not looking at [redacted] for 2nd coordinator for Labrador - too much money. Not sure why [redacted] has him included.

[redacted] - my info same as [redacted]

FYI, [redacted] maintains a master spreadsheet for all the contractors. [redacted] is not on my version.

FYI, I spoke to [redacted] this morning about [redacted]. Short story, [redacted] spoke to [redacted] about the position and provided her with his recruitment agency. I advised him of potential conflict and apparently [redacted] is in the loop through [redacted] and told her to contact [redacted] to choose another agency.

Hope this helps!



[w. muskratfalls.nalcorenergy.com](http://w.muskatfalls.nalcorenergy.com)

You owe it to yourself, and your family, to make it home safely every day. What have you done today so that nobody gets hurt?

[redacted] I have reviewed the contracts discussed last night. 03/06/2014 11:54:27 AM

From: [redacted]
To: [redacted]
Date: 03/06/2014 11:54 AM
Subject: Fw: Information

Is this consistent with your files? [redacted]

Sent from my BlackBerry 10 smartphone on the Bell network.

Information on this page has been redacted under s.40(1)

From: [REDACTED]
Sent: Thursday, March 6, 2014 7:03 AM
To: [REDACTED]
Subject: Information

I have reviewed the contracts discussed last night

We have a master services contract with PMX Inc which allows us to bring personnel onto the project. We do this by completing a requisition and issuing a PO for each individual person. Currently we only have two people through PMX- [REDACTED] (he is a senior contracts administrator at site). We interviewed another person yesterday from PMX for another CA position at site

[REDACTED] is in through Maderra Inc

Newfound Recruiting currently has the following people on the project

[REDACTED]

[REDACTED] is in through Nexus Energy Inc [REDACTED] is the contact person on the contract with Nexus)

[REDACTED] is in through SFO Subsea

[REDACTED]

w. muskratfalls.nalcoreenergy.com

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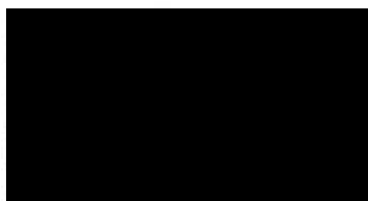


Fw: Summary of Apr 8/14 meet re recent LCP related anonymous letters

04/23/2014 01:58 PM

Hi [redacted]

[redacted] asked me to see you for this documentation?

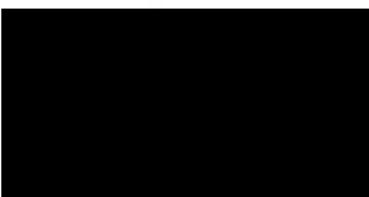


/NLHydro on 04/23/2014 01:58 PM -----

From: [redacted]
To: [redacted]
Date: 04/23/2014 08:37 AM
Subject: Fw: Summary of Apr 8/14 meet re recent LCP related anonymous letters

Hi [redacted]

Just trying to close the loop on this. Could you advise re item #'s 1 & 2 below? Thanks.



/NLHydro on 04/23/2014 08:34 AM -----

From: [redacted]

Information on this page has been redacted under s.40(1)

To:

Cc:

Date:

04/10/2014 12:37 PM

Subject:

Summary of Apr 8/14 meet re recent LCP related anonymous letters

Hi Folks

A short summary of our recent discussion is set out below. Please advise of errors or omissions.

The facts of the matter to date were reiterated. [REDACTED] asked a number of questions around the recruiting efforts of the sub and whether the appearance of conflict of interest was still present. There was also discussion around whether additional reporting to the CEO or the Audit Committee is necessary. It was explained that the matter will be reported anyway to the Board by virtue of a requirement to report all Code of Conduct infractions, but that this would not take place until early 2015.

In addition to the action that has already been taken to have the parent transfer any of their personnel working for Nalcor Energy to another unrelated personnel company, the following additional actions were agreed to:

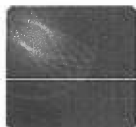
1. Obtain written confirmation from the parties involved that (a) they have received no benefit from the subsidiary or the parent by virtue of their contract with Nalcor Energy and; (b) that they have not solicited any Nalcor personnel or contractors for the subsidiary or the parent and that they will not do so as long as they are under contract with Nalcor energy. ([REDACTED] responsible)
2. Provide Internal Audit with copies of any documentation pertaining to commitments made by individuals involved. ([REDACTED] responsible)
3. Design and deliver information sessions pertaining to the Corporate Code of Conduct. ([REDACTED] responsible)
4. Consider amending the standard contract for contractors to ensure the contractor has an obligation to have familiarity with and agree to adhere to the Nalcor Energy Code of Conduct. ([REDACTED] responsible)
5. Further reporting of the matter to the CEO or the Chair of the Audit Committee will be considered once all documentation pertaining to commitments noted in # 1 above have been examined and considered. ([REDACTED] responsible)

[REDACTED]

Information on this page has been redacted under s.40(1)



Information on this page has been redacted under s.40(1)



Re: NewFound Recruiting

05/12/2014 01:10 PM

Hi

I was asking because one of the four people who were released by Newfound Recruiting to other body shops was not with the SOBI Team. I initially took this to mean that the Team did not consider it appropriate for Newfound to be supplying personnel to any LCP department, but in re-reading [redacted] email, I wonder if that decision was more driven by the fact that the person was working with a family member of [redacted]

[redacted]



[redacted]

05/04/2014 10:52:47 AM

From:
To:
Cc:

[redacted]

Date: 05/04/2014 10:52 AM
Subject: Re: NewFound Recruiting

With respect to item 3, I don't see any implication. Decision making rests with LCMC, not Newfound...

Sent from my BlackBerry 10 smartphone on the Bell network.

From: [redacted]
Sent: Sunday, May 4, 2014 7:43 AM
To: [redacted]
Cc: [redacted]

[redacted]

Information on this page has been redacted under s.40(1)

Subject: Re: NewFound Recruiting

Hi [REDACTED]

Thanks for this. We have some questions/recommendations:

1. The Newfound Recruiting letters are not dated. We suggest that you at least ensure that the documentation on file includes a note thereon as to when you received the correspondence.
2. Only [REDACTED] has provided a letter attesting to his involvement There is no letter from [REDACTED] - Perhaps the easiest thing to do here is to have [REDACTED] sign the [REDACTED] letter as well.
3. One of the Newfound Recruiting letters says that they would have no involvement in SOBI, but they mention nothing of any other parts of the Project The implication here of course is that it would be OK for Newfound Recruiting to supply personnel to other project components. Was this your intention?

[REDACTED]



[REDACTED]

[REDACTED]-05/01/2014 08:21:03 AM-[REDACTED] As requested attached pls. find correspondence related to [REDACTED]

[REDACTED]

Date: 05/01/2014 08:21 AM
Subject: NewFound Recruiting

[REDACTED]

Information on this page has been redacted under s.40(1)

As requested attached pls. find correspondence related to [REDACTED] involvement in Newfound NL Inc. As discussed, [REDACTED] work in the LCP Marine Crossing Team. The other organization we looked at was Newfound Recruiting Corporation, whose owners partnered with [REDACTED] and [REDACTED] in Newfound NL Inc. While Newfound NL Inc. has not supplied people to the LCP, Newfound Recruiting Corporation does. For clarity, [REDACTED] are not involved with Newfound Recruiting Corporation

As a result of our discussions with both organizations, Newfound Recruiting Corporation agreed to release four of their employees to other body shops. Three worked in the Marine Crossing Team, and one worked in another department with a family member of [REDACTED]. The Project can confirm three of these individuals have already changed employers, while the change for the fourth individual takes effect today, May 1.

We also confirmed that [REDACTED] did not play a role in the recruitment of these individuals. Both groups also stated in writing that [REDACTED] did not receive any benefit from Newfound Recruitings involvement with Nalcor.

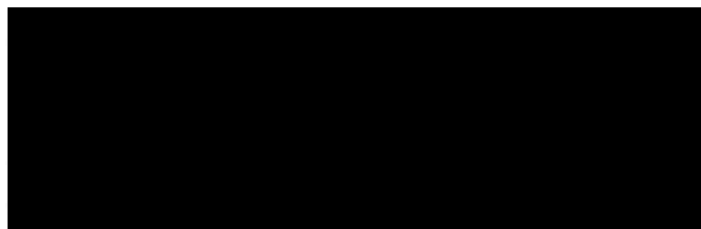
[REDACTED] have also advised that they are in the process of terminating Newfound NL Inc. and will be operating their business under another corporate entity of a different name. They will not attempt to supply personnel to support any aspect of the project. As you will see from the attached correspondence, Newfound Recruiting Corporation has also agreed not to supply people to the Marine Crossings Team in the future. This arrangement is acceptable to the Project Team.

Pls. let me know if you have any questions.

Thanks

[attachment "img-311154700-0001.pdf" deleted by [REDACTED]
[attachment "img-429133406-0001.pdf" deleted by [REDACTED]
[attachment "~8818759.pdf" deleted by [REDACTED]

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w. muskratfalls.nalcoreenergy.com

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Fw: NewFound Recruiting

[Redacted]

05/13/2014 11:54 AM

Hi [Redacted]

With regard to [Redacted] note below providing us with an update in this matter, I believe this, along with attention to my added suggestion #'s 1 & 2 to [Redacted] in my May 4 note, address the additional actions that were considered advisable and as outlined in my April 10 memo on this subject. As part of that memo, I had indicated that upon receiving this information, I would consider the advisability of reporting of the matter to the CEO and possibly the Chair of the Audit Committee. Personally I feel that the matter has been adequately dealt with and now feel that [Redacted] should be made aware of the facts.

With respect to notification to the Audit Committee, I will ask for [Redacted] thoughts, but I personally feel that appropriate action has been taken and the matter addressed and hence consider it appropriate that they be notified in due course as part of the formal annual disclosure of Conflict of Interest reporting protocol that is already in place within the Corporation [Redacted] it is my understanding that you will ensure that this matter is included in that disclosure document.

Please advise if you have any difficulties with this proposed course of action. Thanks.

[Redacted]



[Redacted]

NLHydro on 05/13/2014 11:36 AM -----

From:
To:
Cc:

[Redacted]

Date: 05/01/2014 08:23 AM
Subject: NewFound Recruiting

Information on this page has been redacted under s.40(1)

[REDACTED]

As requested attached pls. find correspondence related to [REDACTED] involvement in Newfound NL Inc. As discussed, [REDACTED] work in the LCP Marine Crossing Team. The other organization we looked at was Newfound Recruiting Corporation, whose owners partnered with [REDACTED] in Newfound NL Inc. While Newfound NL Inc. has not supplied people to the LCP, Newfound Recruiting Corporation does. For clarity, [REDACTED] are not involved with Newfound Recruiting Corporation.

As a result of our discussions with both organizations, Newfound Recruiting Corporation agreed to release four of their employees to other body shops. Three worked in the Marine Crossing Team, and one worked in another department with a family member of [REDACTED]. The Project can confirm three of these individuals have already changed employers, while the change for the fourth individual takes effect today, May 1.

We also confirmed that [REDACTED] did not play a role in the recruitment of these individuals. Both groups also stated in writing that [REDACTED] did not receive any benefit from Newfound Recruiting's involvement with Nalcor.

[REDACTED] have also advised that they are in the process of terminating Newfound NL Inc. and will be operating their business under another corporate entity of a different name. They will not attempt to supply personnel to support any aspect of the project. As you will see from the attached correspondence, Newfound Recruiting Corporation has also agreed not to supply people to the Marine Crossings Team in the future. This arrangement is acceptable to the Project Team.

Pls. let me know if you have any questions.

Thanks



~8818759.pdf



img-311154700-0001.pdf



img-429133406-0001.pdf

[REDACTED]

[REDACTED]

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Newfound Recruiting and related anonymous letter

05/14/2014 01:43 PM

History:

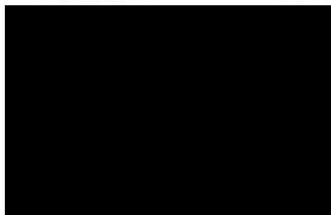
This message has been replied to.

Hi Folks

█ has been advised of the facts and is satisfied that due process was followed. As there are some matters for follow-up, Internal Audit will document the facts in a confidential working paper file. Matters I have for follow-up are:

1. Delivery of information sessions to the LCP Team re the Nalcor Code of Conduct and Business Ethics - █
2. Inclusion of the facts of the matter in the 2014 Board report re Code of Conduct and Business Ethics compliance - █
3. Note the date of receipt on Newfound Recruiting letters - █
4. Letter from █ similar to that received from █
5. Evidence of consideration given to having standard contract for contractors amended to ensure contractor familiarity with Nalcor Code of Conduct and Business Ethics - █ (not sure on this one?)

Please let me know of any errors or omissions.



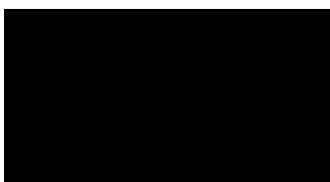
Information on this page has been redacted under s.40(1)



Re: Newfound Recruiting and related anonymous letter

05/20/2014 04:14 PM

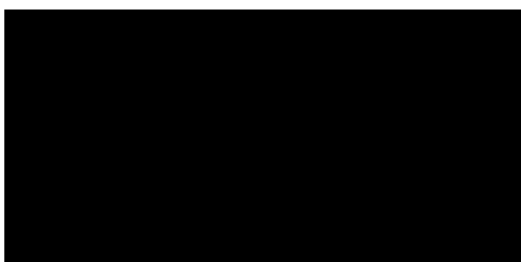
Thanks a lot [redacted] Welcome back!



[redacted] I'm back from vacation and will request t... 05/20/2014 01:13:09 PM

From: [redacted]
To: [redacted]
Date: 05/20/2014 01:13 PM
Subject: Re: Newfound Recruiting and related anonymous letter

[redacted] I'm back from vacation and will request the additional documentation.



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[redacted] Hi Folks [redacted] has been advised of the facts and is... 05/14/2014 01:43:12 PM

From: [redacted]
To: [redacted]

Information on this page has been redacted under s.40(1)

Date: [REDACTED]
05/14/2014 01:43 PM
Subject: Newfound Recruiting and related anonymous letter

Hi Folks

[REDACTED] has been advised of the facts and is satisfied that due process was followed. As there are some matters for follow-up, Internal Audit will document the facts in a confidential working paper file. Matters I have for follow-up are:

1. Delivery of information sessions to the LCP Team re the Nalcor Code of Conduct and Business Ethics - [REDACTED]
2. Inclusion of the facts of the matter in the 2014 Board report re Code of Conduct and Business Ethics compliance - [REDACTED]
3. Note the date of receipt on Newfound Recruiting letters - [REDACTED]
4. Letter from [REDACTED] similar to that received from [REDACTED]
5. Evidence of consideration given to having standard contract for contractors amended to ensure contractor familiarity with Nalcor Code of Conduct and Business Ethics - [REDACTED] (not sure on this one?)

Please let me know of any errors or omissions.

[REDACTED]



[REDACTED]

Information on this page has been redacted under s.40(1)

Re: NewFound Recruiting

CIMFP Exhibit P-03965

Page 61

to:

05/04/2014 10:52 AM

Cc:

Hide Details

With respect to item 3, I don't see any implication. Decision making rests with LCMC, not Newfound...

Sent from my BlackBerry 10 smartphone on the Bell network.

From:

Sent: Sunday, May 4, 2014 7:43 AM

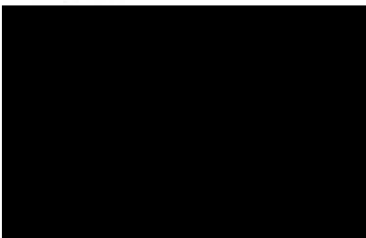
Subject: Re: NewFound Recruiting

Hi

Thanks for this. We have some questions/recommendations:

1. The Newfound Recruiting letters are not dated. We suggest that you at least ensure that the documentation on file includes a note thereon as to when you received the correspondence.
2. Only [redacted] has provided a letter attesting to his involvement. There is no letter from [redacted] - Perhaps the easiest thing to do here is to have [redacted] sign the [redacted] letter as well.
3. One of the Newfound Recruiting letters says that they would have no involvement in SOBI, but they mention nothing of any other parts of the Project. The implication here of course is that it would be OK for Newfound Recruiting to supply personnel to other project components. Was this your intention?

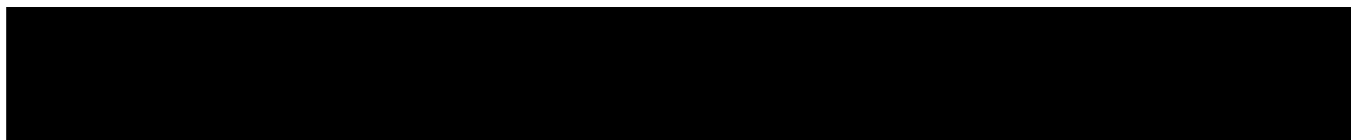
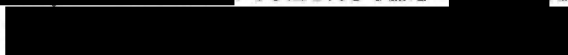
Information on this page has been redacted under s.40(1)



4 08:21:03 AM--



As requested attached pls. find correspondence related to



Date: 05/01/2014 08:21 AM
Subject: NewFound Recruiting



As requested attached pls. find correspondence related to involvement in Newfound NL Inc. As discussed, work in the LCP Marine Crossing Team. The other organization we looked at was Newfound Recruiting Corporation, whose owners partnered with in Newfound NL Inc. While Newfound NL Inc. has not supplied people to the LCP, Newfound Recruiting Corporation does. For clarity, are not involved with Newfound Recruiting Corporation.

As a result of our discussions with both organizations, Newfound Recruiting Corporation agreed to release four of their employees to other body shops. Three worked in the Marine Crossing Team, and one worked in another department with a family member of . The Project can confirm three of these individuals have already changed employers, while the change for the fourth individual takes effect today, May 1.

We also confirmed that did not play a role in the recruitment of these individuals. Both groups also stated in writing that did not receive any benefit from Newfound Recruiting's involvement with Nalcor.

have also advised that they are in the process of terminating Newfound NL Inc. and will be operating their business under another corporate entity of a different name. They will not attempt to supply personnel to support any aspect of the project. As you will see from the attached correspondence, Newfound Recruiting Corporation has also agreed not to supply people to the Marine Crossings Team in the

Information on this page has been redacted under s.40(1)

future. This arrangement is acceptable to the Project Team.

CIMFP Exhibit P-03965

Page 63

Pls. let me know if you have any questions.

Thanks



[attachment "img-311154700-0001.pdf" deleted by [redacted] NLHydro] [attachment "img-429133406-0001.pdf" deleted by [redacted] NLHydro] [attachment "~8818759.pdf" deleted by [redacted] NLHydro]



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[REDACTED]

Nalcor Energy
500 Columbus Drive
St. John's, NL
A1E 1T3

Dear [REDACTED]

This is to confirm that NewFound Recruiting agrees not to directly engage in the placement of consultants in the Strait of Belle Isle (SOBI) group within Nalcor Energy. This would entail consultants that would be deemed as permanently working within the SOBI Group.

Thanks

[REDACTED]

Managing Partner
NewFound Recruiting Corporation

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Re: Fw: Letter

04/02/2014 04:26 PM

History: This message has been forwarded.

[Redacted] would like to introduced the red wording. He has a concern that if he has brought in a candidate for a position not related to our work and then they could be shifted into a role on our team. Ala quality HSE working at Torbay rd gets allocated to our work. Let me know if this is ok
Thanks

[Redacted]

w. muskratfalls.nalcoreenergy.com

[Redacted] a couple of points... - NewFound Recr... 04/01/2014 12:17:16 PM

From: [Redacted]
To: [Redacted]
Date: 04/01/2014 12:17 PM
Subject: Re: Fw: Letter

[Redacted]. a couple of points...
- NewFound Recruiting should not engage either directly or indirectly in the original placement of consultants in the SOBI group.
- This should include all staff and consultants - either temporary or long term.
If you have any questions pls. call. Thanks

[Redacted]

[Redacted]

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[Redacted]

03/27/2014 04:04:39 PM

From: [Redacted]
To: [Redacted]
Date: 03/27/2014 04:04 PM
Subject: Fw: Letter

Good afternoon [Redacted]

[Redacted] has compiled the attached. I wanted to send to you prior to submitting to [Redacted] to ensure this is all that you require. Could you confirm the attached satisfies everything you need?


Thanks so much

[Redacted]

Sent from my BlackBerry 10 smartphone on the Bell network.

From: [Redacted]


(Document "NYL Letter.doc" Added by Sales County/ML/MLH)


Nalcor Energy
500 Columbus Drive
St. John's, NL
A1E 1T3

Dear 

This is to confirm that NewFound Recruiting agrees not to directly engage in the placement of consultants in the Strait of Belle Isle (SOBI) group within Nalcor Energy. This would entail consultants that would be deemed as permanently working within the SOBI Group.

Thanks


Managing Partner
NewFound Recruiting Corporation



Fw: Newfound Letter

[Redacted]

04/29/2014 04:16 PM

Hey [Redacted]

See attached signed letter from [Redacted] as requested.

In future, I would appreciate if [Redacted] were not involved in any correspondence between Nalcor and Newfound Recruiting to ensure we comply with Nalcors Code of Ethics.

Thanks, [Redacted]

[Redacted]

[w. muskratfalls.nalcorenergy.com](http://w.muskatfalls.nalcorenergy.com)



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Information on this page has been redacted under s.40(1)



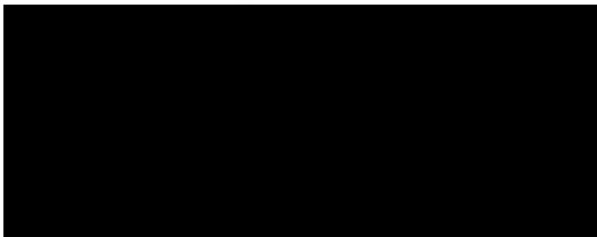
Newfound NL Inc. Termination

04/30/2014 11:14 AM

[REDACTED]

As per the email sent to you on March 23rd, 2014, I confirm that [REDACTED] will be terminating Newfound NL Inc. and will operate our business under another corporate entity of a different name.

Cheers [REDACTED]



w. muskratfalls.nalcoreenergy.com

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Re: follow-up

[Redacted]

05/21/2014 07:42 AM

History: This message has been replied to.

No problem

[Redacted]

[Redacted] has another meeting in the afternoon, so I can drop in and see you at 2 pm if that works for you? I assume your office is in the same place by the Tower Room.

Cheers,

[Redacted]

[Redacted]

[w. muskratfalls.nalcorenergy.com](http://w.muskatfalls.nalcorenergy.com)

[Redacted]

I'm in a meeting from 3.00 to 5.00. Can we do it...

05/20/2014 03:11:27 PM

From: [Redacted]
To: [Redacted]
Cc: [Redacted]
Date: 05/20/2014 03:11 PM
Subject: Re: follow-up

I'm in a meeting from 3.00 to 5.00. Can we do it before then? We only need five mins.

[Redacted]

[Redacted]

[w. muskratfalls.nalcorenergy.com](http://w.muskatfalls.nalcorenergy.com)

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[Redacted]

would you have five minutes lat...

05/20/2014 02:55:07 PM

From: [Redacted]

Information on this page has been redacted under s.40(1)

To: [REDACTED]
Date: 05/20/2014 02:55 PM
Subject: Re: follow-up

Hey [REDACTED]

I'll check with [REDACTED] and revert as soon as I speak with him.

I'd suggest anytime tomorrow afternoon if that suits you though?

Cheers, [REDACTED]

Sent from my BlackBerry 10 smartphone on the Bell network.

From [REDACTED]

Sent: Tuesday, May 20, 2014 1:16 PM

Subject: follow-up

[REDACTED] would you have five minutes later today or tomorrow to close out our conversation on NewFound? There are no issues or concerns, just an additional request from Nalcor. I'm just back from vacation so I'm pretty flexible. Perhaps you could propose a time that works for you both?

[REDACTED]

[REDACTED]

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March 24th, 2014

[REDACTED]

Nalcor Energy
500 Columbus Drive
P.O Box 13000, Stn A
St. John's, NL, Canada
A1B 0M1

Dear [REDACTED]

I am writing this letter to confirm that [REDACTED] have not received any benefit from Newfoundland Recruiting Inc.'s business with the Lower Churchill Project.

Furthermore, [REDACTED] will not provide any services or personnel to the Lower Churchill Project through any entity in which we have ownership for the duration of our employment by the Labrador Island Link Limited Partnership.

Yours truly,

[REDACTED]



Re: outstanding documentation

05/21/2014 10:41 AM

[Redacted]

History: This message has been forwarded.



20140521102639.pdf

[Redacted]

As requested, see attached letter sent previously inclusive of [Redacted]

Also, please note that the paperwork has been filed with government to dissolve the Newfound NL Inc. corporate entity, thus, it is my expectation that the dissolution should be executed in short order.

Cheers, [Redacted]

[Redacted]

w. muskratfalls.nalcoreenergy.com

[Redacted] See attached signed letter as requestec 03/24/2014 11:23:15 AM

From: [Redacted]
To: [Redacted]
Cc: [Redacted]
Date: 03/24/2014 11:23 AM
Subject: Re: outstanding documentation

[Redacted]

See attached signed letter as requested.

Note that I have not included item 5 in the letter, but I confirm that we will be dissolving Newfound NL Inc., as you've requested, and will operate under another corporate entity of a different name.

Cheers [Redacted]

[attachment " [redacted] Nalcor Letter_20140324.pdf" deleted by [redacted] (NLHydro)]

w. muskratfalls.nalcorenergy.com

[redacted] We have the letter from Newfound Recr... 03/19/2014 05:04:18 PM

From:
To:
Cc:

Date: 03/19/2014 05:04 PM
Subject: Re: outstanding documentation

[redacted]
I am out of office until Friday but will ensure you receive the appropriate letter from [redacted] by the coming Monday at the latest.

I had thought that Nalcor was dealing with Newfound directly regarding the other letter, but I will certainly contact them myself and coordinate as well.

Cheers, [redacted]

Sent from my BlackBerry 10 smartphone on the Bell network.

From: [redacted]
Sent: Wednesday, March 19, 2014 3:20 PM

Subject: Re: outstanding documentation

[redacted] We have the letter from Newfound Recruiting stating you have not received any financial benefit from Newfound Recruiting's dealings with Nalcor.

We still require:

1. A letter from [redacted] confirming that you have not received benefit from Newfound Recruiting's dealings with Nalcor.
2. A letter from Newfound Recruiting stating they will not provide any further individuals to the Marine Crossings Team.
3. A letter from Newfound Recruiting stating the three individuals currently supplied by Newfound to the MCT and the individual in Environment will be referred to another agency.
4. A letter from [redacted] stating that the company [redacted] partially own will not supply people to the LCP.

5. A letter from [REDACTED] stating that you will change the name of this company.

I don't think it matters if your undertakings are in one letter or several as long as we have it in writing. However, it was our understanding that you were chasing down the other letter(s) from Newfound. Can you confirm? We really do need to wrap this up.

Thanks

[REDACTED]

[REDACTED]

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[REDACTED] -03/17/2014 08:43:23 AM-- [REDACTED] We were waiting to ensure [REDACTED] had a chance to discuss with [REDACTED] and had received th

[REDACTED]

Date: 03/17/2014 08:43 AM

Subject: Re: outstanding documentation

[REDACTED]

We were waiting to ensure [REDACTED] had a chance to discuss with [REDACTED] and had received the letter from Newfound Recruiting

My understanding is that you require a letter from [REDACTED] stating that

we have received no benefit from any business arrangement between Newfound Recruiting and Nalcor, in addition, Newfound NL will not perform any services for Nalcor while we are employed here.

If this is sufficient, please let me know and we will send over the letter in short order.

Cheers,

[Redacted]

[Redacted]

w. muskratfalls.nalcorenergy.com

[Redacted] --03/17/2014 08:29:46 AM-

[Redacted]

I have yet to receive the documentation you committed to provide the last time we s

[Redacted]

Date: 03/17/2014 08:29 AM

Subject: outstanding documentation

[Redacted]

I have yet to receive the documentation you committed to provide the last time we spoke. When do you expect this to be ready? If there is an issue pls. let me know. We need to clue this up as quickly as possible Thanks

[Redacted]

[Redacted]



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Information

03/06/2014 07:03 AM

History: This message has been forwarded.

I have reviewed the contracts discussed last night.

We have a master services contract with PMX Inc which allows us to bring personnel onto the project. We do this by completing a requisition and issuing a PO for each individual person. Currently we only have two people through PMX - [REDACTED] (he is a senior contracts administrator at site). We interviewed another person yesterday from PMX for another CA position at site.

[REDACTED] is in through Maderra Inc.

Newfound Recruiting currently has the following people on the project;

[REDACTED]

[REDACTED] is in through Nexus Energy Inc [REDACTED] is the contact person on the contract with Nexus)

[REDACTED] is in through SFO Subsea

[REDACTED]

[w. muskratfalls.nalcoreenergy.com](http://w.muskratfalls.nalcoreenergy.com)

[REDACTED]
Nalcor Energy
500 Columbus Drive
St. John's, NL
A1E 1T3

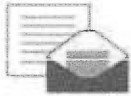
Dear [REDACTED]

Based on our conversation on March 11, 2014, this letter is to confirm that both [REDACTED] [REDACTED] have received no financial benefit from NewFound Recruiting with respect to any placements that have been made with Nalcor Energy.

I hope this meets with your approval.

Sincerely,

[REDACTED]
Managing Partner
NewFound Recruiting Corporation

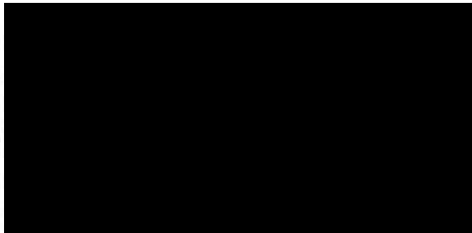


Re: Fw: Letter from NewFound Recruiting

03/19/2014 11:02 AM

History: This message has been replied to.

Yes but [redacted] was getting those letters from them. - my understanding



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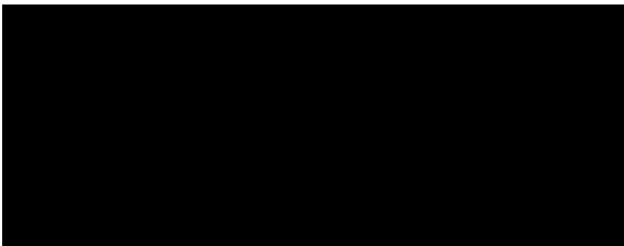
Thanks. Can we have a quick chat today? I tho...

03/19/2014 10:42:28 AM

From: [redacted]
To: [redacted]
Date: 03/19/2014 10:42 AM
Subject: Re: Fw: Letter from NewFound Recruiting

Thanks. Can we have a quick chat today? I thought they were also going to agree to:
- not provide anyone else to the MCT
- release the three people they have in the MCT plus the one individual in Environment

Thanks



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I rec'd this while I was away.



03/17/2014 08:47:50 AM

From: [redacted]
To: [redacted]
Date: 03/17/2014 08:47 AM

Subject: Fw: Letter from NewFound Recruiting

[REDACTED] I rec'd this while I was away.

[REDACTED]

w. musktratfalls.nalcoreenergy.com

----- Forwarded by [REDACTED] on 03/17/2014 08:47 AM -----

From: [REDACTED]
To: [REDACTED]
Date: 03/11/2014 05:23 PM
Subject: Letter from NewFound Recruiting

Hi [REDACTED]
Thanks again for taking the time to chat today. I understand how busy you are, so I appreciate the time you gave me.

Please let me know if you need anything else from me

[REDACTED]

[REDACTED]

Managing Partner
NewFound Recruiting Corporation
320-303 Moodie Drive | Ottawa, ON | K2H 9R4

[REDACTED]

steve@newfoundrecruiting.com <<http://www.newfoundrecruiting.com/>>

>

[attachment "img-311154700-0001.pdf" deleted by [REDACTED]]

Information on this page has been redacted under s.40(1)



Re: heads up

[Redacted]

04/09/2014 06:24 AM

I have reviewed the situation that Newfound Recruiting brings up. I think we are ok with this wording. If they supply someone to the project in a discipline outside the SOBI team and that person gets assigned a role within the SOBI team then [Redacted] are really not involved in that decision or control that person.

Since this is so sensitive I have copied [Redacted] for his opinion. I am available to discuss further if required.

[Redacted]

w. muskratfalls.nalcoreenergy.com

[Redacted] can we discuss this when you get a secon... 04/08/2014 02:42:00 PM

From: [Redacted]
To: [Redacted]
Date: 04/08/2014 02:42 PM
Subject: heads up

[Redacted]. can we discuss this when you get a second? It has come up with corporate.
[Redacted]

[Redacted]

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----- Forwarded by [Redacted] on 04/08/2014 02:41 PM -----

From: [Redacted]
To: [Redacted]

Date: 04/02/2014 05:08 PM
Subject: Fw: Letter

[REDACTED] can we discuss? Brian

[REDACTED]

w. muskratfalls.nalcoreenergy.com

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----- Forwarded by [REDACTED] on 04/02/2014 05:08 PM -----

From: [REDACTED]
To: [REDACTED]
Date: 04/02/2014 04:26 PM
Subject: Re: Fw: Letter

[REDACTED]
[REDACTED] would like to introduced the red wording. He has a concern that if he has brought in a candidate for a position not related to our work and then they could be shifted into a role on our team. Ala quality HSE working at Torbay rd gets allocated to our work.
Let me know if this is ok
Thanks

[REDACTED]

w. muskratfalls.nalcoreenergy.com

[REDACTED] a couple of points... - NewFound Recr... 04/01/2014 12:17:16 PM

From: [REDACTED]
To: [REDACTED]
Date: 04/01/2014 12:17 PM
Subject: Re: Fw: Letter

[REDACTED]. a couple of points...
- NewFound Recruiting should not engage either directly or indirectly in the original placement of consultants in the SOBI group.

- This should include all staff and consultants - either temporary or long term.
If you have any questions pls. call. Thanks

[Redacted]

[Redacted]

w. muskratfalls.nalcoreenergy.com

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[Redacted]

03/27/2014 04:04:39 PM

From: [Redacted]
To: [Redacted]
Date: 03/27/2014 04:04 PM
Subject: Fw: Letter

Good afternoon [Redacted]

[Redacted] has compiled the attached. I wanted to send to you prior to submitting to [Redacted] to ensure this is all that you require. Could you confirm the attached satisfies everything you need?

Thanks so much

[Redacted]

Sent from my BlackBerry 10 smartphone on the Bell network.

From: [Redacted]

[Redacted]

Information on this page has been redacted under s.40(1)

Fwd: NewFound Recruiting

CIMFP Exhibit P-03965

Page 85

to:

03/05/2015 06:53 AM

Hide Details

fyi

Sent from my iPad

Begin forwarded message:

From: [Redacted]
Date: March 4, 2015 at 1:14:50 PM EST
To: [Redacted]
Subject: Re: NewFound Recruiting

Thanks

Sent from my BlackBerry 10 smartphone on the Bell network.

From: [Redacted]
Sent: Wednesday, March 4, 2015 10:57 AM
To: [Redacted]
Subject: NewFound Recruiting

Hi [Redacted]


I hope things are well and I am sure you enjoying having the Grandson around.

I just left you a quick voice mail, but as a courtesy, I wanted to follow up with this note as well. It is just to let you know that [Redacted] no longer have any affiliation whatsoever with NewFound Recruiting. I know this was a concern for you last year, and I just wanted to let you know that this affiliation has been terminated amicably by the three of us.

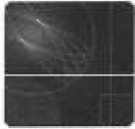
[Redacted]

[Redacted]



 927C27A7-90FB-4EE8-9B70-5E5E4EBE9949[51].png





Newfound Recruiting and related anonymous letter

[Redacted]

05/14/2014 01:43 PM

History: This message has been replied to.

Hi Folks

[Redacted] has been advised of the facts and is satisfied that due process was followed . As there are some matters for follow-up, Internal Audit will document the facts in a confidential working paper file. Matters I have for follow-up are:

1. Delivery of information sessions to the LCP Team re the Nalcor Code of Conduct and Business Ethics - [Redacted]
2. Inclusion of the facts of the matter in the 2014 Board report re Code of Conduct and Business Ethics compliance - [Redacted]
3. Note the date of receipt on Newfound Recruiting letters - [Redacted]
4. Letter from [Redacted] similar to that received from [Redacted] - [Redacted]
5. Evidence of consideration given to having standard contract for contractors amended o ensure contractor familiarity with Nalcor Code of Conduct and Business Ethics - [Redacted] (not sure on this one?)

Please let me know of any errors or omissions.

[Redacted]



[Redacted]



Information on this page has been redacted under s.40(1)

NALCOR ENERGY - LOWER CHURCHILL PROJECT

RECEIPT OF ANONYMOUS LETTER

SUMMARY OF FACTS

- Matter has been rectified to the satisfaction of the Manager Internal Audit, the Vice president Human Resources and Organizational Effectiveness, General Counsel and Corporate Secretary and the Vice President Lower Churchill Project
- Anonymous letter received Feb 26/14 stating: "It has been reported to me that there may be unethical and / or fraudulent hiring practices taking place within the Lower Churchill Project. I am not personally aware of the legality of these claims but thought it proper to have this situation made known to Internal Audit to substantiate or deny the rumors that continue to arise. It has been reported that some project leaders/Managers, who have been hired as contractors, have companies formed and it is through these companies that employees are hired under their direct supervision. The potential conflict of interest is that these persons directly receive financial gain through the hiring of their own employees, for which the company receives a "head hunting or administrative" fee for the hire."
- Per policy, the VP LCP was advised, who then conducted an internal investigation
- It was subsequently determined that there was some merit to the complaint and steps were immediately taken to rectify the situation
- Per policy, the Vice president Human Resources and Organizational Effectiveness and the General Counsel and Corporate Secretary were advised and briefed
- Some further steps were considered necessary
- All parties, including the Manager Internal Audit expressed comfort with the steps taken
- Matter was then reported to the President and CEO
- Immediate reporting to Board was not considered appropriate, but rather it will be reported under existing protocols for the reporting of breaches of conflict of interest policy
- Details of findings and steps taken
 - [REDACTED] work in the LCP Marine Crossing Team and are involved in Newfound NL Inc.
 - Newfound Recruiting Corporation owners partnered with [REDACTED] in Newfound NL Inc.
 - While Newfound NL Inc. has not supplied people to the LCP, Newfound Recruiting Corporation has.
 - For clarity, [REDACTED] are not involved with Newfound Recruiting Corporation.
 - Discussion held with both organizations
 - Newfound Recruiting Corporation agreed to release four of their employees to other recruitment agencies. Internal Audit was informed that this has occurred.
 - [REDACTED] did not play a role in the recruitment of the four individuals transferred to other recruitment agencies.

Information on this page has been redacted under s.40(1)

- Both groups also stated in writing that [REDACTED] did not receive any benefit from Newfound Recruiting's involvement with Nalcor.
- [REDACTED] have also advised that they are in the process of terminating Newfound NL Inc. and will be operating their business under another corporate entity of a different name.
- They have confirmed in writing that they will not attempt to supply personnel to support any aspect of the project.
- Newfound Recruiting Corporation has also agreed not to supply people to the Marine Crossings Team in the future.
- Internal Audit has received copies of all written undertakings.
- Further recommended steps
 - Include details of matter in the 2014 report to the Board re Code of Business Conduct and Ethics compliance.
 - Deliver information sessions to the LCP Team re the Nalcor Code of Conduct and Business Ethics
 - Note the date of receipt on Newfound Recruiting letters
 - Obtain letter from [REDACTED] similar to that received from [REDACTED]
 - Give consideration to having standard contract for contractors amended to ensure contractor familiarity with Nalcor Code of Conduct and Business Ethics



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P.O. Box 12800, St. John's, NL
Canada A1B 0C9
t. 709.737.1440 f. 709.737.1800
nalcorenergy.com

May 20, 2016

[REDACTED] 40(1)

VIA EMAIL

Attention: [REDACTED] 40(1)

Dear [REDACTED] 40(1)

Re: Your request for access to information under Part II of the *Access to Information and Protection of Privacy Act, 2015* (File #: PB/320/2016)

On April 22, 2016, Nalcor Energy (Nalcor) received your request for access to the following records:

Please provide the following information related to the Lower Churchill Project:

1. The latest Project Delivery Team Organization Charts for the LCMC.
2. Listing of names, positions / titles, salaries, compensation of all individuals listed in organization chart.
3. Designation of each individual listed in organization chart as either Contractor or Nalcor Employee and their mode of employment (ie. hired from within Nalcor such as transfer, hired via a recruitment agency, hired via LCP HR department not via recruitment agency).
4. Listing of all employees who have been hired via a recruitment agency and the name of the recruitment agency, the charge out rate from the recruitment agency to LCP and salary actually payed to the employee.
5. Total 2015 salary / compensation for the entire Project Deliver Team listed in item 1 above.
6. Listing of recruitment agencies used by LCP and a breakdown of the number of employees hired per agency.
7. Any internal Nalcor documentation / correspondence related to any internal audit of potential conflict of interest or improper hiring practices by the LCP through recruitment agencies.

On May 2, 2016, through clarification discussions with you, the following items of your request were narrowed as follows:

- Item 2 – narrowed to taxable earnings over \$100,000 for 2015.
- Item 4 – narrowed to the charge out rates for 2015.
- Item 6 – narrowed the time period to the last 5 years.
- Item 7 – narrowed the time period to the last 5 years.

Please be advised that your request has been granted in part, as detailed below.

1. The latest Project Delivery Team Organization Charts for the LCMC.

Response: Please see the attached Appendix A. This is Nalcor's latest Organization Chart for the Lower Churchill Management Corporation (LCMC) Project Delivery Team and is current as of November 2015. Please note that these charts reflect the reporting relationship of individuals and includes individuals that are employed by Nalcor Energy, LCMC, third party contractors and recruitment agencies.

Please be advised that there are a few instances where personal information has been withheld from disclosure as the release of that information is presumed to be an unreasonable invasion of an individual's privacy in accordance with section 40(4)(c) of the Act as it would reveal information about a person's employment history. Information has also been withheld in accordance with section 40(4)(g) of the Act as it would reveal an individual's name and other personal information about that individual.

2. Listing of names, positions / titles, salaries, compensation (taxable earnings over \$100, 000) of all individuals listed in organization chart.

Response: For the names and positions/titles of individuals that are part of the Project Development Team for LCMC, please see Nalcor's response to item 1.

With respect to the taxable earnings of employees of Nalcor Energy, Nalcor has already publicly disclosed the names, title and total taxable earnings for all Nalcor employees with compensation over \$100,000, including Nalcor employees working with the LCMC. This information has been published on *The Telegram's* website, located here: <http://www.thetelegram.com/FlyingPage/7571/Newfoundland-and-Labrador-sunshine-list-public-employees-earning-100000>.

A number of individuals who work on the Muskrat Falls Project are hired via external companies and recruitment agencies. LCMC contracts with the company or recruitment agency for a particular position or positions. That company/recruitment agency then provides suitable personnel for the position(s) requested. Those individuals are neither employees of LCMC nor Nalcor. Therefore their salary/compensation is not paid to them directly by either LCMC or Nalcor. Any employment contract that might exist is between the person and the company/recruitment agency. Therefore, Nalcor does not have any records that are responsive to this portion of this request.

- 3. Designation of each individual listed in organization chart as either Contractor or Nalcor Employee and their mode of employment (ie. hired from within Nalcor such as transfer, hired via a recruitment agency, hired via LCP HR department not via recruitment agency).*

Response: Please see the attached Appendix B.

- 4. Listing of all employees who have been hired via a recruitment agency and the name of the recruitment agency, the charge out rate (for 2015) from the recruitment agency to LCP and salary actually payed to the employee.*

Response: Please see the attached Appendices C and D.

Please be advised that Nalcor has provided the name of the recruitment agencies and the generic positions provided by each agency. Nalcor is unable to disclose who is employed by a particular agency as the release of that information is presumed to be an unreasonable invasion of an individual's privacy in accordance with sections 40(4)(c) and 40(4)(g) of the Act. In order to be as responsive to this item as possible, Nalcor has provided generic titles for the positions provided by the listed recruitment agencies and a range of the charge out rates for each position.

Further, as stated above in Response 2, individuals employed by recruitment agencies are neither employees of LCMC nor Nalcor. Therefore, their salary/compensation is not paid to them directly by either LCMC or Nalcor. Any employment contract that might exist is between the person and the recruitment agency. Nalcor does not have any records that are responsive to this portion of this request.

5. *Total 2015 salary / compensation for the entire Project Delivery Team listed in item 1 above.*

Response: The total taxable earnings for individuals directly employed by LCMC is \$5,769, 682.54.

As noted above, Nalcor does not pay the salary or compensation for individuals that are not employees of LCMC or Nalcor, and therefore does not have any records that are responsive to this portion of this request.

6. *Listing of recruitment agencies used by LCP (for the last five years) and a breakdown of the number of employees hired per agency.*

Response: Please see attached Appendix E.

7. *Any internal Nalcor documentation / correspondence related to any internal audit of potential conflict of interest or improper hiring practices by the LCP through recruitment agencies (for the last five years).*

Response: Please see attached Appendix F for the results of an internal audit that assessed the hiring process and orientation processes of the Lower Churchill Project. It commenced in 2015 and concluded 18 February 2016. The audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing as developed by the Institute of Internal Auditors. The audit concluded that LCP Human Resources, which manages the recruiting function, is operating with a sound control environment.

Also in Appendix F are emails related to an anonymous complaint sent to Nalcor Energy in 2014. Please note that personal information has been withheld from disclosure pursuant to section 40(1).

Please be advised that the responsive records for this request will be published following a 72 hour period after the response is sent electronically to you or five business days in the case where records are mailed to you. It is the goal to have the responsive records posted to Nalcor Energy's website within one business day following the applicable period of time.

Please be advised that you may ask the Information and Privacy Commissioner to review the processing of your access request, as set out in section 42 of the *Access to Information and Protection of Privacy Act* (the "Act"). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner.

The address and contact information of the Information and Privacy Commissioner is as follows:

Office of the Information and Privacy Commissioner
2 Canada Drive
P. O. Box 13004, Stn. A
St. John's, NL. A1B 3V8

Telephone: (709) 729-6309
Toll-Free: 1-877-729-6309
Facsimile: (709) 729-6500

You may also appeal directly to the Supreme Court Trial Division within 15 business days after you receive the decision of the public body, pursuant to section 52 of the *Act*.

If you have any further questions, please feel free to contact the undersigned by telephone at (709) 778-6671 or by e-mail at traceypennell@nalcorenergy.com.

Sincerely,



Tracey L. Pennell
Access to Information Coordinator