

Policy.



Indigenous Relations Policy.

Purpose and scope

The purpose of this Policy is to assist Personnel to develop long-term, mutually beneficial relationships with Indigenous Groups in support of TC Energy's business and sustainability objectives across Canada, the United States and Mexico.

This Policy defines the Company's collaborative approach to relationships with Indigenous Groups aimed at achieving regulatory certainty and maintaining access to land, while supporting such Indigenous Groups' capacity-building initiatives and participation in economic opportunities.

Implementation of this Policy is consistent with Our Commitment Statement and is guided by the following principles of Indigenous Relations at TC Energy:

- Those most impacted should benefit most.
- Mutual benefit for TC Energy and the Indigenous Groups with whom the Company engages.
- Being a partner of choice for Indigenous Groups.
- Early and honest communication.

These principles support execution of the following objectives:

- Build and sustain support from Indigenous Groups for TC Energy's projects and operations.
- Indigenous Groups and TC Energy succeed and benefit when each other succeeds and benefits.
- Provide clarity to Personnel on TC Energy's approach for the most effective ways to engage, consult and achieve support through alignment of interests.
- Abide by conventions, laws and regulations, but recognize that this alone is insufficient to build and sustain support.
- Develop long-term, value-based relationships built on trust, respect and integrity.

This Policy applies to all Personnel.

Policy

- 1.1 Any specific strategies and practices developed will align with this Policy and the applicable jurisdiction in which the Company is operating or building.
- 1.2 When engaging and collaborating with Indigenous Groups, all Personnel will respect the spirit and intent of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and its guiding principles within the context of existing Canadian, U.S. and Mexican law and the associated commitments and roles that governments in those jurisdictions have, relative to Indigenous Groups.
- 1.3 All Personnel conducting business activities on behalf of TC Energy will recognize and respect that Indigenous Peoples:
 - a) are often guided by separate political institutions and traditional and/or hereditary organizational and governance structures in addition to those of the jurisdictions where they are located; and
 - b) have a unique relationship with the land and resources associated with TC Energy's business activities.
- 1.4 When engaging with Indigenous Groups, Personnel will use a principled and transparent approach to engage at the earliest possible opportunity to share information, allow them to identify interests, understand the potential impacts of the Company's business activities and make decisions freely and openly.
- 1.5 Personnel will use every reasonable opportunity to engage Indigenous Groups' leadership to identify opportunities in pursuit of mutually-beneficial partnerships to:
 - a) seek out Indigenous Groups' business capacity and capabilities with the Company's project requirements and qualifications;
 - b) develop skills in the local workforce compatible with industry need and the development of energy-related infrastructure;
 - c) develop community-led innovative project strategies, reflecting engagement and regulatory outcomes that are defensible and commercially reasonable;
 - d) explore opportunities for economic partnerships; and
 - e) support community-led initiatives tailored to local priorities.
- 1.6 Personnel working with Indigenous Groups are required to take the Company's foundational Indigenous cultural awareness training to enhance their effectiveness and collaboration.

Your responsibility

Personnel must follow all applicable provisions and the spirit and intent of this corporate governance document and support others in doing so. Personnel must promptly report any suspected or actual violation of this corporate governance document through available channels so that TC Energy can investigate and address it appropriately. Personnel who

violate this corporate governance document or knowingly permit others under their supervision to violate it, may be subject to appropriate corrective action, up to and including termination of employment or contract, as applicable, in accordance with the Company's corporate governance documents, employment practices, contracts, collective bargaining agreements and processes.

Interpretation and administration

The Company has sole discretion to interpret, administer and apply this corporate governance document and to change it at any time to address new or changed legal requirements or business circumstances.

Non-retaliation

TC Energy supports and encourages Personnel to report suspected violations of corporate governance documents, applicable laws, regulations, and authorizations, as well as hazards, potential hazards, incidents involving health and safety or the environment, and near hits. Such reports can be made through available [channels](#). TC Energy takes every report seriously and investigates it to identify facts and, when warranted, makes improvements to our corporate governance documents and practices. All Personnel making reports in good faith will be protected from retaliation, and all Personnel must report if they or someone they know is being or has been retaliated against for reporting. Good Faith Reporting will not protect Personnel who make intentionally false or malicious reports, or who seek to exempt their own negligence or willful misconduct by the act of making a report.

Definitions

Aboriginal Peoples means the First Nations, Métis, and Inuit peoples whose rights are recognized and affirmed in the Canada Constitution Act, 1982.

Contingent Workforce Contractor (CWC) means an individual who:

- is employed by a third party to work on behalf of TC Energy;
- uses TC Energy's assets (e.g., workstation, email, phone) and corporate services;
- is compensated on an hourly or daily rate basis; and
- works under the direction of a TC Energy leader.

Employee means full-time, part-time, temporary and student employees of TC Energy.

Engagement means the activities conducted by TC Energy to identify, understand and consider the potential effects of TC Energy's business activities on Indigenous groups, with the intention to substantively address them.

Good Faith Reporting means an open, honest, fair and reasonable report without malice or ulterior motive.

Indian means an individual who is a member of an Indian tribe, band, or community that is recognized by the United States federal government.

Indígenas of Mexico include those who descend from populations that inhabited the current territory of Mexico at the beginning of colonization and preserve their own social, economic and political institutions, or part of them. They include individuals that self-identify as Indigenous.

Indigenous Groups means any combination of Aboriginal, Indigenous and Indígenas Peoples, communities or organizations.

Indigenous Peoples means Aboriginal Peoples, Indians, and Indígenas peoples of Canada, the United States and Mexico, respectively.

Personnel means full-time, part-time and temporary Employees and Contingent Workforce Contractors of TC Energy.

TC Energy or the **Company** means TC Energy Corporation and its wholly owned subsidiaries and/ or operated entities.

References

Related corporate governance and supporting documents

- Code of Business Ethics Policy
- Our Commitment Statement
- Supplier Diversity and Local Participation Policy

Other references

- [Indigenous Relations Brochure](#)
- [Reconciliation Action Plan](#)
- [United Nations Declaration on the Rights of Indigenous Peoples](#)

How to contact us

- [Policy Questions and Comments](#)

TC Energy's reporting channels

- [Ethics Helpline](#)
- [Corporate Compliance](#)
- [Internal Audit](#)
- Human Resources
- Legal department
- Compliance Coordinators