

Policy.



Artificial Intelligence Policy.

Purpose and scope

This Policy describes TC Energy's expectations and requirements for the trustworthy, ethical and responsible development and use of Artificial Intelligence (AI) Solutions, in alignment with TC Energy's core values and corporate governance documents.

Implementation of this Policy is consistent with TC Energy's Responsible AI Standard, which is guided by the following principles for managing AI Risk:

- **Accountability** – Clear ownership and responsibility for AI Solutions throughout their lifecycle, promoting transparency and trust.
- **Bias and Fairness** – Treat individuals and groups equitably, without discrimination or favoritism.
- **Compliance** – Ethical design and use of AI Solutions that adhere to applicable laws, regulations and international standards.
- **Data and Information Protection** – Use of AI Solutions maintains the security of Confidential Information.
- **Explainability** – Clear explanations of decision criteria and outputs, enabling human understanding and validation.
- **Reliability** – Consistent and accurate performance of AI Solutions that meet stakeholder expectations.
- **Security** – AI Solutions conform to established security requirements.
- **Transparency** – Appropriate levels of disclosure regarding an AI Solution's purpose, design and impact, empowering stakeholders to understand and utilize them effectively.

This Policy applies to all Employees and Contractors of TC Energy.

Policy

1 General provisions

- 1.1 Subject to Section 1.4, when using an AI Solution for Company Business, Employees and Contractors must only use Company-approved AI Solutions on TC Energy Digital Assets in accordance with the Acceptable Use Policy and as outlined on the AI Learning Hub;
- 1.2 Employees and Contractors must:
 - a) use AI Solutions in compliance with TC Energy's Code of Business Ethics Policy and all other applicable corporate governance documents, including but not limited to, the Acceptable Use Policy, Communications Policy, Cybersecurity Policy, Equal Employment Opportunity and Non-Discrimination Policy, Harassment-Free Workplace policies, Information Management Policy, Inter-Affiliate Codes and Protection of Personal Information Policy;
 - b) ensure the AI Solution is used appropriately and for its intended purpose; and
 - c) apply human verification, judgement and expertise within their area of competency to validate AI Solution input and output accuracy, and solve potentially erroneous, incomplete, or otherwise problematic AI solution inputs and outputs identified.
- 1.3 Employees and Contractors are prohibited from inputting any Confidential Information into any AI Solution that is not in accordance with Section 1.2.
- 1.4 Employees and Contractors may only use publicly available AI Solutions (e.g., AI-enhanced search engines, public research assistants) for Company Business if conducting general research using currently publicly available information, and such use must comply with Sections 1.2 and 1.3.
- 1.5 All Data and Information generated as an output of an AI Solution used for Company Business is property of TC Energy.

2 AI Risk management

- 2.1 Prior to implementation and/or deployment, Employees and Contractors involved in an AI Solution's lifecycle, as defined in the AI Governance Framework, must complete all required compliance assessment requirements for matters such as cybersecurity, data governance, information governance, Inter-Affiliate compliance, protection of Personal Information and security of Confidential Information, as well as comply with TC Energy's AI Governance Standards, including when modifying the scope or decommissioning existing AI Solutions.
- 2.2 Third-party AI Solutions must be procured in accordance with TC Energy's Procurement Policy.
- 2.3 All recipients of Data and Information from TC Energy, including but not limited to Employees, Contractors, customers, rightsowners and landowners, must be informed

when they are interacting with an AI Solution or receiving automated AI-generated Data and Information that does not have human oversight, such as chatbots.

3 Non-conformance reporting

3.1 In addition to the reporting requirements described in the *Your Responsibility* section of this Policy, Employees and Contractors involved in an AI Solution's lifecycle, as defined in the AI Governance Framework, must also report all known non-conformances with this Policy to [AI Governance](#).

Your responsibility

Employees and Contractors must follow all applicable provisions and the spirit and intent of this corporate governance document and support others in doing so. Employees and Contractors 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. Employees and Contractors 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 Employees and Contractors 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 Employees and Contractors making reports in good faith will be protected from retaliation, and all Employees and Contractors must report if they or someone they know is being or has been retaliated against for reporting. Good Faith Reporting will not protect Employees and Contractors 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

Artificial Intelligence (AI) means the ability of machines to perform tasks that normally require human intelligence (e.g., decision-making, pattern recognition, language understanding).

AI Risk means the potential for negative financial, reputational, environmental, health and safety, or regulatory consequences, arising from inadequate controls in the design, development, deployment or use of an AI Solution. Potential sources of AI Risks include, but are not limited to:

- misalignment with business needs;
- improper use or sharing of Confidential Information (Data leaks);
- incorrect parameter estimation;
- flawed hypotheses or assumptions;
- computational errors;
- inaccurate, incomplete, or inappropriate Data;
- improper or unintended use; and
- insufficient monitoring or governance controls.

AI Solution means a machine-based system that, without being explicitly programmed for each specific task, uses input data to generate outputs, such as predictions, content, recommendations, or decisions, with the goal of solving a specific problem, or automating a task or influencing physical or digital environments. AI Solutions typically leverage technologies such as:

- Generative AI: systems that focus on creating new content, such as text, images, or code, based on patterns learned from existing data. Examples include using large language models to draft reports, summarize regulatory documents, or assist with stakeholder communications; and
- Machine Learning: systems that learn from data to make predictions or decisions without being explicitly programmed. These models are typically used for tasks such as forecasting energy demand, detecting anomalies in pipeline operations, or optimizing maintenance schedules.

Company Business means all business activities undertaken by Employees and Contractors during the Company's operations or on the Company's behalf, on or off TC Energy's premises.

Confidential Information means all of TC Energy's non-public Data and Information because, if disclosed, it may be misused, of use to competitors, or harmful to TC Energy or its customers, suppliers, or other stakeholders. It can include, but is not limited to, Data and Information regarding TC Energy's business, operations, finances, marketing activities, strategies or business plans, customers, Employees, Contractors, contracts, projects, proposed mergers, acquisitions and divestitures, technical and economic data, engineering designs and reports, specifications, models, field notes, sketches, photographs, legal

proceedings including legally privileged information, environmental reports, land and lease information, electronic information assets (including emails, voicemails, short message service [SMS], and text messages), Personal Information, Regulated Information, computer records or software, or any other Data or Information, including Data and Information generated by an AI Solution, which is or may be either applicable to or related in any way to the assets, business or affairs of TC Energy.

Contractor means a third party hired by TC Energy to perform services for or supply equipment, materials, or goods to the Company. Contractors include, without limitation, Contingent Workforce Contractors and Excluded Contractors.

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 (Canada and the U.S.) and monthly (Mexico); and
- works under the direction of a TC Energy leader.

Data means facts represented as text, numbers, graphics, images, sound, or video. Data is the raw material used to represent Information, or from which Information is derived.

Digital Asset means any network device, computer system, application, data storage systems, or service (and associated data required for operation). This includes, but is not limited to, laptops, tablets, smartphones and removable media.

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

Excluded Contractor means a third party or individual employed by a third party who:

- delivers services, equipment, materials, or goods to the Company using their own tools and assets (e.g., work station, laptop, email, phone, PPE, vehicle);
- does not increase TC Energy corporate headcount and overhead costs;
- does not use TC Energy's assets and corporate services; and
- directs their own work or receives direction from their employer.

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

Information means any content, Data, materials or document created or received during Company Business, regardless of the source, medium or form (printed or electronic, including instant and text messages). For the full definition and related governance, see the Information Management Policy.

Personal Information means any information on its own or when combined with other information, which can be used to identify an individual. For the full definition, see the Protection of Personal Information Policy.

Regulated Information means certain information as defined in TC Energy’s Inter-Affiliate Codes and which is generally understood as non-public, shipper specific information such as shipper names or contract volumes, terms or paths, nominations or credit information, as well as non-public information regarding operations, outages, capacity availability, and maintenance, and also includes planning, financial or strategic information belonging to TC Energy’s regulated pipelines that is not fully and currently publicly available.

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

- AI Governance Framework
- AI Governance Solution Delivery Process
- AI Tools & Technology Standard
- Acceptable Use Policy
- Code of Business Ethics Policy
- Communications Policy
- Cybersecurity Policy
- Equal Employment Opportunity and Non-Discrimination Policy
- Harassment-Free Workplace in Canada | the U.S. | Mexico Policy
- Information Management Policy
- Inter-Affiliate Codes
- Procurement Policy
- Protection of Personal Information Policy
- Responsible AI Standard

Other References

- [AI Governance](#)
- AI Learning Hub

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