

# WORKING WITH TC ENERGY

Contractor Code of Business Ethics (COBE) Policy

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# MESSAGE FROM FRANÇOIS POIRIER

At TC Energy, we know what we do, and more importantly, how we do it, matters. The actions and decisions we make every day impact the Company and the communities we serve. That's why we must ensure our actions are aligned with our values. It is important that stakeholders, rightsholders and the public are confident they can count on us to act with integrity in every situation.

Our core values – *safety in every step, personal accountability, one team* and *active learning* – form the foundation of how we do business. Our Code of Business Ethics (COBE) and this Contractor COBE, provide clear guidance on what ethical conduct looks like in action.

As a Contractor with TC Energy, you are expected to read, understand and comply with the principles and requirements set out in COBE, and refer to COBE and this Policy regularly to help guide your decisions at work.

COBE and this Policy also provide a framework for asking questions and highlight resources in place to report concerns.

TC Energy's purpose is clear – we are proud to connect the world to the energy it needs. Our continued success relies on our reputation as a safe, reliable and ethical company that moves, generates and stores the critical energy North America relies on. By living our values every day, you help ensure TC Energy continues to be a company that is trusted to make the right choices and do the right thing.



**François Poirier**  
President & CEO

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# OUR EXPECTATIONS AND YOUR RESPONSIBILITIES

This Contractor Code of Business Ethics (COBE) Policy reinforces TC Energy Corporation's (the Company's or TC Energy's) requirements and expectations for conducting business with us or on our behalf. This Policy is intended to supplement the terms and conditions of your agreement with TC Energy and to serve as a reference and provide guidance on our requirements and expectations. The Policy does not supersede our policies, but rather functions together with them. As such, if there are any conflicts or ambiguities between this Policy and other TC Energy policies, TC Energy policies will prevail.

We expect you to understand these requirements and to be knowledgeable on how you are required to meet TC Energy's standards. We expect compliance with all applicable laws, regulations, policies and rules.

We expect our Contractors to meet the same standards as TC Energy. If you are unsure of what standard you need to comply with, you should contact your TC Energy representative.

TC Energy reserves the right to monitor and assess compliance by Contractors with this Policy, and Contractors must be able to demonstrate compliance with this Policy on request and cooperate with any such requests. Failure to comply with the requirements set out in this document, or any TC Energy rules and guidelines, may lead to serious consequences including termination of the business relationship.

In the context of this Policy, "Contractor" is limited to Excluded Contractors.

"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.



Look for this symbol throughout the Contractor COBE Policy to guide you to relevant policies available on our website at [TCEnergy.com/vendors](https://www.tceenergy.com/vendors)



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## ETHICS HELP LINE

Canada / U.S.: 1-888-920-2042

Mexico: 800-283-2783 (if calling from a cell phone)

0-800-283-2783 (if calling from a land line)

[TCEnergy.com/about/governance/code-of-business-ethics](https://www.tcenenergy.com/about/governance/code-of-business-ethics)

# OUR VALUES

Our values guide our behaviours, decisions and actions every day.



## SAFETY IN EVERY STEP

**I put safety first** to protect myself, my teammates, the public and the environment.



## PERSONAL ACCOUNTABILITY

**I act with integrity** and own my commitments and outcomes.



## ONE TEAM

**I am part of the greater whole,** where our unique skills enable us to achieve more together.



## ACTIVE LEARNING


**I embrace learning** in all aspects of my work with curiosity and creativity.

 **Our Commitment Statement**



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# LIVING OUR VALUES

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- + Human rights
- + Employment equity and equal opportunity'
- + Harassment and violence-free workplace
- + Protecting everyone from weapons in the workplace



## MAKING THE RIGHT CHOICES AND DOING THE RIGHT THING

At TC Energy, making the right choices and doing the right thing aren't just words – it's fundamental to how we do business. But, what does it really mean to make the right choices and do the right thing? At a minimum, it means following the principles set out in this Policy, including:

- Reporting all health, safety and environment related hazards, potential hazards, incidents, near hits and unsafe acts
- Complying with the applicable legal requirements and corporate policies that impact your daily work
- Reporting, through TC Energy's Ethics Help Line, any instances of actual or potential non-compliance with legal requirements or with this Policy that you become aware of
- Not retaliating against anyone for good-faith reporting
- Supporting others in making the right choices and doing the right thing

### If you're ever unsure, ask...

If you are ever unsure of how to make the right choices and do the right thing, it is always better to ask. The consequences of violating the law, this Policy or any corporate policy are very serious and can include disciplinary action up to and including termination of the business relationship. In some circumstances, inappropriate conduct may also need to be reported to the authorities, and TC Energy could bring legal action against those involved. By asking before you act, you protect both yourself and the Company.

### ETHICS HELP LINE

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# SAFETY IN EVERY STEP

## Protect myself, my teammates, the public and the environment

Our commitment to safety isn't just a mantra – it's how we work 24/7, 365 days of the year across our entire organization. What started as a foundational value within our safety department decades ago has now come to mean much more to our Company. We ensure that when doing our work we put safety in every step to prevent all harm, loss and incidents.

We expect that our Contractors share TC Energy's commitment to safety.

Learning from both achievements and challenges is essential for continuous improvement and growth. By reflecting on successes we can replicate effective safety strategies, and analyzing setbacks allows us to avoid repeating mistakes.

Whether you work in a field location or in an office setting, you must always ensure that you comply with all health, safety and environment related legal requirements, as well as the requirements set out by TC Energy in this Policy and applicable policies.

❖ If it isn't safe, we won't do it. By reinforcing a disciplined set of rules and providing rigorous training, we approach everything we do with safety and performance at the forefront.

We report all health, safety and environment related hazards, potential hazards, incidents, near hits and unsafe acts. We take every report seriously, investigate to identify facts and ensure immunity from disciplinary action for the Good Faith Reporting of all incidents and issues.

QUESTION: I'm working on a big project and it's very important to the Company that it be completed on-time and on-budget. I'm concerned that I might be injured if I rush my work, but I'm feeling a lot of pressure to do so. What should I do?

ANSWER: You should never compromise your or anyone else's safety. If someone is pressuring you to do so, you must report the issue.



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## ALCOHOL AND DRUG USE AND BEING FIT FOR WORK

TC Energy does not compromise our ability to do our jobs or the safety of others through the use of intoxicants, including alcohol, drugs or medications, whether they are legal or not.

Given the nature of TC Energy’s business, it is essential that all workers be fit to perform their jobs. The use of drugs and alcohol can impair your judgment and productivity and can lead to serious accidents and health and safety concerns – not only for yourself, but also for your coworkers and the public.

••• **TC Energy takes a zero-tolerance approach toward the use of alcohol, drugs, and intoxication while working on our behalf. You must always report fit for work and remain fit for work while engaged in any TC Energy business. Inability to do so will result in serious consequences including being removed from our site(s) and possible termination of our business relationship.**

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### Contractor Alcohol and Drug Guideline

#### What does being fit for work mean?

Fit for work means being able to safely and acceptably perform your assigned duties without any limitations due to the use or after-effects of any intoxicants. This can include legally-obtained medications (prescription and over-the-counter) which has the potential to change or adversely affect the way a person thinks, feels, or acts.



# HUMAN RIGHTS

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Consistent with Our Commitment Statement, TC Energy does not tolerate human rights abuses. In our business activities, including engaging with Indigenous groups and stakeholders across Canada, the United States and Mexico, we are committed to respecting human rights. We will not be complicit with, nor engage in, any business activity that supports or facilitates abuse of human rights.

As a participant in the United Nations (UN) Global Compact, TC Energy supports the Ten Principles of the UN Global Compact on human rights, labour, environment and anti-corruption. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our Company, and to engage in collaborative projects which advance the broader development goals of the UN, particularly the Sustainable Development Goals.

TC Energy considers the International Bill of Human Rights, which consists of the Universal Declaration of Human Rights, and the core International Labour Organization (ILO) Conventions when adopting human rights best practices. This enables the Company, including our Contractors, to comply with all applicable international standards, federal, provincial, state, and local laws, rules, regulations, orders, and ordinances, including, without limitation, environmental protection, energy, health and safety, and labor laws and regulations, as well as applicable industry codes and standards.

We stand firmly against any third party who uses forced labour, including child labour, prison labour, bonded labour, military labour, modern forms of slavery, human trafficking and any form of physical or mental abuse within our business and operations.

TC Energy expects our Contractors to comply with applicable legislated standards such as minimum wage, minimum age, wage payment, maximum work hours, mandatory holidays, progressive remuneration in case of overtime and benefits laws.

 **Our Commitment Statement**

 **Indigenous Relations Policy**

TC Energy monitors and assesses its Contractors for compliance with human rights requirements, and may terminate business relationships in the event violations are confirmed.



## HARASSMENT AND VIOLENCE-FREE WORKPLACE

Everyone deserves to do their job in a safe, respectful, and inclusive workplace, without fear of harassment or violence.

You must always be respectful to our Employees and Contractors and be sensitive to the way in which others may react to your behaviours, comments, gestures or contacts. Always try to resolve differences in a calm and respectful manner, without resorting to insults, threats or violence.

TC Energy prohibits any behaviour that is:

- Intimidating
- Hostile
- Offensive
- Threatening
- Violent
- Demeaning or humiliating
- Of a sexual nature
- Creating an inappropriate work environment

This includes displaying any statements, messages, or images (e.g., on clothing, stickers on hard hats, decals on vehicles, etc.) which are prohibited by TC Energy or which create an inappropriate work environment.

## EMPLOYMENT EQUITY AND EQUAL OPPORTUNITY

TC Energy believes that our differences make us stronger and encourages a culture of inclusion and belonging. We prohibit any form of discrimination and provide reasonable accommodation of differences. We expect Personnel to create and reinforce an inclusive, creative and productive work environment in which everyone is accepted and respected.

TC Energy reserves the right to conduct independent investigations depending on the severity of the allegations or the complexity of the investigation, and also reserves the right to remove any person from its property.

- TC Energy requires you to be tolerant, inclusive and to demonstrate respect for others.
- TC Energy requires that we treat one another with dignity and respect, and we are committed to maintaining an inclusive and respectful environment that is free of harassment and violence.

### Harassment-Free Workplace Policy Canada • U.S. • Mexico

In particular, you must never take actions or make unwanted comments or gestures or discriminate against anyone on the basis of:

- Gender
- Gender identity
- Race
- Marital status
- National or ethnic origin
- Family status
- Colour
- Veteran status
- Disability
- National Guard or reserve unit obligations
- Religion
- A criminal conviction
- Age
- Or any other legally protected grounds
- Sexual orientation



# PROTECTING EVERYONE FROM WEAPONS IN THE WORKPLACE

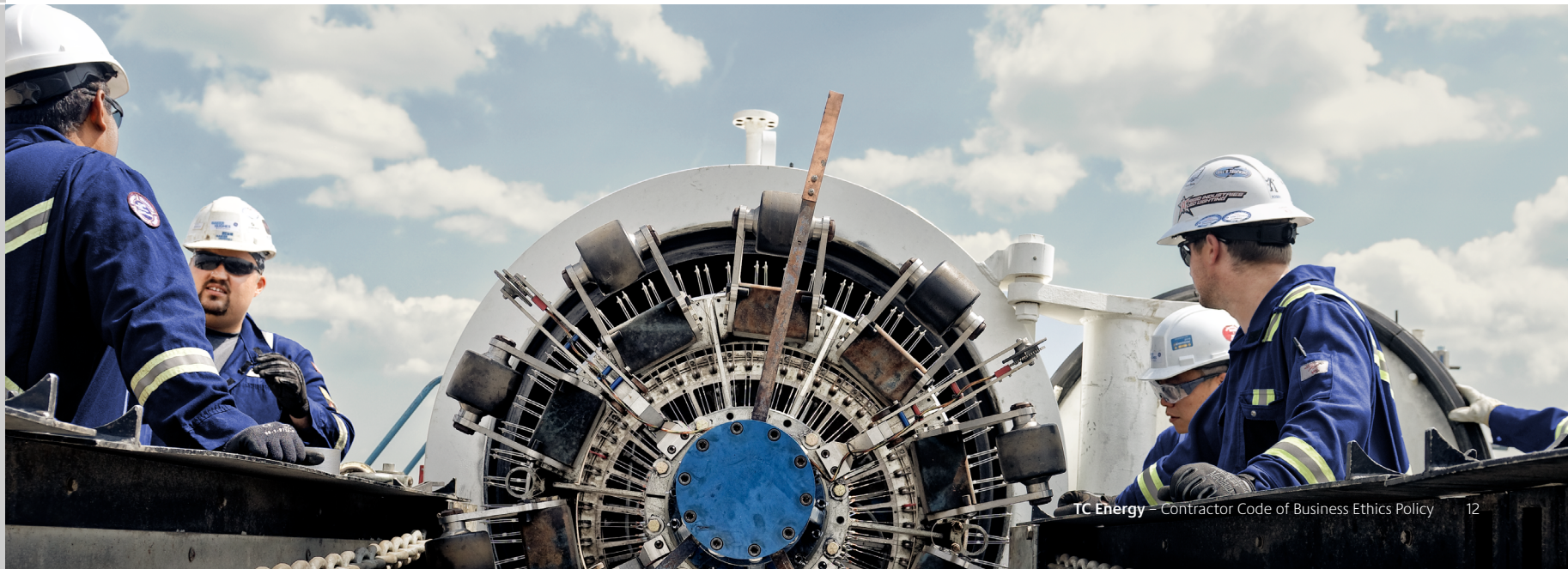
We prohibit the possession, use, carrying or transportation of any dangerous or potentially dangerous weapons, as defined by TC Energy's Weapons in the Workplace Policy, when conducting Company business:

- On or off all Company owned or controlled premises
- In all Company vehicles (whether owned, leased or rented)
- In all personal vehicles being used while conducting Company business

For individuals in jurisdictions that permit firearms to be kept in personal vehicles, when in a Company parking lot the vehicle must be locked, firearms must be hidden from plain view and be kept within a locked case or container within the vehicle.



••• Individuals who are licensed to carry firearms (openly or in a concealed manner) are not exempt from our Policy.



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# ETHICAL BUSINESS CONDUCT

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- + Insider trading
- + Complying with regulatory requirements
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## AVOIDING CONFLICTS OF INTEREST

We must act in the best interest of TC Energy, avoiding situations that could place us in a conflict of interest, or create the perception of a conflict of interest. If, and when, a conflict of interest arises, you are required to report the conflict in a timely manner so it can be appropriately investigated and addressed. See the "Asking Questions and Reporting Concerns" section of this Policy for more information.

You should never make or influence business decisions on behalf of TC Energy based on personal relationships, bias or the potential for personal gain.

- Personal accountability is a our core value at TC Energy. In simple terms, this means acting with integrity and owning your commitments and outcomes. To act with integrity means we make the right choices and do the right thing – always. This is part of who we are and how we do business, every day.



## GIFTS, INVITATIONS AND ENTERTAINMENT

Corruption in both business and government is a problem since it prevents fair and open competition based on merit. All Contractors acting on our behalf must comply with all applicable anti-corruption laws and TC Energy's COBE Policy, including with respect to giving and accepting any gifts, meals, entertainment and invitations.

Contractors are prohibited from offering, paying, promising or authorizing a bribe or kickback to anyone, including to any government official, directly or indirectly, to influence a government official's decisions or actions in TC Energy's favour, or to otherwise secure any contract, concession or other improper advantage for TC Energy. Such action is prohibited even if the intent is not to influence the government officials, but it could appear to be improper.

If there is any doubt about whether offering, paying, promising, or authorizing compensation, payments or benefits to anyone, directly or indirectly, is prohibited under this Policy or applicable anti-corruption laws, Contractors must not provide or agree to provide it. Contractors must instead contact TC Energy's [Corporate Compliance](#) department for interpretation and guidance.

Since TC Energy can be held responsible for improper payments and benefits provided by Contractors and other third parties acting on TC Energy's behalf, Contractors must also ensure that the subcontractors with whom they have agreements are legitimate, reputable parties who understand their obligations not to provide any improper payments or benefits in connection with the business they do for TC Energy.

### What gifts, invitations and entertainment can TC Energy personnel accept?

Accepting gifts or invitations can affect the way TC Energy is perceived and can compromise our business objectives and values.

Keep the following requirements in mind when deciding whether or not to give gifts or entertainment to TC Energy personnel:

- The provision of gifts, meals or entertainment should occur infrequently and must not be lavish.
- Never offer cash, cash equivalents (such as gift cards), shares or securities.
- Never give a gift, entertainment or other benefit that could be considered offensive or in poor taste, or that could damage TC Energy's image and reputation.
- Never give a gift, entertainment or other benefit in exchange for a business advantage.
- During the normal course of business, invitations for meetings over meals and beverages are acceptable provided they are not lavish in nature.
- Other types of invitations, such as sporting events, golf rounds or other types of trips are acceptable after TC Energy personnel obtain the required approvals.
- Occasional promotional gifts (such as pens, coffee mugs, calendars) may be accepted as a customary business courtesy, provided that the frequency of gift must not exceed four times per calendar year and a value of CAD \$150/ USD \$150/ MXN \$1000 per gift or total more than CAD \$300/ USD \$300/ MXN \$2000 in aggregate for the calendar year.



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## ENGAGING GOVERNMENT OFFICIALS

Engaging with government officials is an important part of TC Energy's business, and during those engagements, expenses for government officials may be incurred. You should never provide government officials with bribes, payments, kickbacks, gifts or anything else of value for the purpose of improperly influencing their actions or decisions in TC Energy's favour. These benefits can include entertainment, private parties, charitable contributions or employment opportunities.

In the event that a legitimate expense for a government official is incurred, it must always be appropriately accounted for in TC Energy's books and records.

Even if there is no intent to influence, you should not provide a payment or benefit to any third party if it could appear to be improper.

Contractors must not provide gifts, meals, entertainment, or other business hospitality, including travel and related expenses, to government officials except where permitted under local law and when approved in advance and in writing by a TC Energy Vice-President. Per diems for government officials are not permitted under any circumstances.

In accordance with the Mexico General Law of Administrative Responsibilities (GLAR), and the strict requirements therein, Contractors are strictly prohibited from providing any gifts, entertainment, or travel to a government official of Mexico. Where reasonable, customary meals may be provided to a government official of Mexico when approved in advance and in writing by a TC Energy Vice-President.

All expenses for government officials must be accurately and separately described with complete detail, including a copy of the TC Energy Vice-President's written approval, in all invoicing submitted to TC Energy. Contractors must provide the names of the applicable government officials for which the specific expenses were incurred.

Contractors are strictly prohibited from making political contributions on behalf of TC Energy, or relating to TC Energy.

⋮ If you have any questions or concerns about engaging with government officials or tracking necessary expenses, contact your TC Energy representative.

Contractors must report in a timely manner, any violations or suspected violations of Anti-Corruption Laws or this Policy which arise in the provision of work or other activities for TC Energy or in the course of their duties acting as an agent of TC Energy. This includes reporting of any request that the Contractor make a bribe, kickback, facilitation payment, or other type of payment or other provision of a benefit which is prohibited under applicable anti-corruption laws or this Policy, as well as any offer to the Contractor of a bribe, kickback, facilitation payment, or other provision of a benefit which is prohibited under applicable anti-corruption laws or this Policy. All such incidents shall be immediately reported to TC Energy's [Corporate Compliance](#) department.

Nothing in this Policy prohibits the making of cash or in-kind payments to government officials or anyone else when the life, safety, or health of any person are at imminent risk. The making of any such payments must be immediately reported to TC Energy's [Corporate Compliance](#) department and accurately recorded in the Contractor's books and records. No such payments may be made for the purpose of protecting property.

### Examples of government officials relevant to TC Energy's business include:

- Government ministers and their staff
- Members of legislative bodies or other elected officials
- Officials or employees of government departments
- Employees of regulatory agencies
- Judges and judicial officials
- Employees of government-owned or controlled corporations
- Customs, immigration, tax, and police personnel
- Indigenous government officials
- Employees of public international organizations, such as the United Nations or World Bank

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## INSIDER TRADING

Through the course of your business with TC Energy, you may have access to non-public information regarding TC Energy, our customers, Contractors and other business partners.

You must always maintain the confidentiality of any non-public information encountered through the course of business with TC Energy. To the extent non-public information that you are aware of could be material to a decision to buy or sell shares in TC Energy or another company:

- You and your immediate family members must not trade TC Energy shares or other securities based on that information
- You must not share material non-public information with another person, except as necessary in the course of business. If you are unsure of what confidentiality requirements you need to comply with, you should contact your TC Energy representative.

Insider trading is a serious offence and can have significant reputational and legal impacts.

Confidential information about TC Energy's projects and operations, such as project delays, costs or outage timing and the resulting system capacity impacts can influence the decisions of participants in the gas market. Such information must be disclosed to all customers and other gas market participants at the same time through the Company's typical communication protocols, such as a bulletin.

## COMPLYING WITH REGULATORY REQUIREMENTS

As a regulated Company, TC Energy is subject to many regulatory requirements, including those of the Canada Energy Regulator (CER), the Federal Energy Regulatory Commission (FERC), the North American Energy Reliability Corporation (NERC), and the Comisión Nacional de Hidrocarburos, among others. In addition, TC Energy's transmission providers are subject to tariffs that we must comply with.

Although it is impossible to list all of these requirements here, you must ensure you are familiar with the specific requirements applicable to you in your job. These can include reporting requirements and compliance with technical or other standards.

To the extent the requirements of more than one jurisdiction apply, you must comply with the highest of the various standards.

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## INTER-AFFILIATE INTERACTIONS

As a transmission provider, TC Energy is subject to the Canadian Gas Pipelines Code of Conduct (Code) in Canada, the Federal Energy Regulatory Commission (FERC) Standards of Conduct (SOC) in the U.S., and the TC Energía Code of Conduct in Mexico (Inter-Affiliate Codes). These Inter-Affiliate Codes are intended to ensure that our non-regulated affiliates do not receive an unfair advantage over other customers, whether as a result of discriminatory treatment or the sharing of information, personnel or resources. The Inter-Affiliate Codes also prohibit cross-subsidization at the expense of our transmission customers.

In order to ensure compliance with the Inter-Affiliate Codes, you must observe the following rules in your day-to-day activities:

### All customers must be treated equally

Regulated transmission providers must not give undue preference to any customer, whether affiliated with a TC Energy entity or not.

### Independent functioning

Regulated personnel and affiliates must function independently of non-regulated personnel and affiliates (e.g., they must function without coordination or the sharing of non-public Regulated Information\*).

### No conduit of information

Regulated and shared personnel must not share, or act as a conduit for the sharing of Regulated Information with non-regulated personnel (e.g. by way of SharePoint links, Power Apps, Power Bi reports, meetings etc.).

### Pay fair share

Non-regulated affiliates must pay their fair share of any costs incurred by our regulated transmission providers, so as not to burden our transmission customers with costs our non-regulated entities benefit from.

### Reporting violations

Any violations of the Inter-Affiliate Codes must be reported to the Inter-Affiliate Compliance department, since TC Energy may be legally required to either publicly post such information on its electronic bulletin boards, websites or report it to our regulators.

*\*Regulated Information (which may not be shared with non-regulated personnel or affiliates) includes commercial, financial, strategic, planning, operational and customer information of our transmission providers.*



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## COMPETING FAIRLY

A competitive marketplace in the energy and transmission services that TC Energy provides helps ensure fair prices and customer choice and, in turn, results in the industry as a whole providing more effective and better service. We believe in vigorous, fair competition and comply with all laws designed to protect the ability of companies to compete freely.

### You should never enter into agreements to:

- Fix prices
- Decrease capacity or volume available to customers
- Allocate customers or markets among competitors
- Boycott certain customers or Contractors

As such, you need to be very careful whenever you have contact with competitors (whether in trade association meetings, at conferences, through participation in benchmarking groups or in negotiating or otherwise dealing with actual or potential joint venture partners who are also TC Energy competitors) to avoid sharing competitively sensitive information. You must never enter into an agreement to reduce competition, or that is likely to have that effect.



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# ACCOUNTING, FINANCIAL REPORTING AND FRAUD PREVENTION

TC Energy ensures that our accounting, financial records and reporting are true, fair, accurate, understandable and complete, and we do not falsify financial documents or records, or misstate or misrepresent the nature of costs or expenditures. We expect our Contractors to have similar policies and procedures in place to ensure their accounting and financial reporting comply with appropriate accounting principles and best practices.

You must ensure all transactions that you engage in, or that you approve, whether under a TC Energy contract or as an individual business expense, are reported and that the reporting is true, accurate, complete and complies with all applicable accounting and legal requirements. You must also follow all relevant corporate policies and other requirements respecting the transaction (for example, obtaining of approvals).

You must never engage in “off-the-record” or other transactions or accounts that do not fully and accurately state the nature and amount of specific transactions.

You must also never falsify any invoice, expenditure, time sheet, benefits claim or other document related to the Company, our stakeholders, contractors or benefits providers. Doing so constitutes fraud and may result in appropriate corrective action, up to and including termination of employment or contract.

## Avoiding Bribery and Corruption Policy



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# COMMUNICATION

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- + Being socially responsible and a good ambassador



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## DEALING FAIRLY WITH STAKEHOLDERS

We are proud of our long-standing reputation in dealing fairly and honestly with our customers, Contractors and other stakeholders, and we honour our obligations and commitments to them.

As a representative of TC Energy, treating customers, Contractors and other stakeholders fairly requires that you enter into business relationships based on merit and objective criteria, such as price, quality and service. It also requires that you are honest and forthright when dealing with others (never omitting important facts, manipulating another person or situation, or misrepresenting yourself or TC Energy), and that you honour TC Energy's contractual, regulatory and other commitments.

- You should never make business decisions on behalf of TC Energy based on personal relationships, bias or the potential for personal gain.
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## SOCIAL MEDIA AND COMMUNICATIONS WITH THE PUBLIC

In the age of social media, it is easy to communicate information broadly and publicly. You need to be particularly aware of your obligations and our expectations when it comes to the disclosure of Company information and ensuring it is in accordance with legal and internal requirements.

When sharing information on social media, keep the following requirements in mind:

- Do not speak on behalf of or give the impression that you are speaking on behalf of TC Energy, unless you have been authorized to do so
- Be clear that your comments represent your opinion and are not written on behalf of TC Energy
- Use good judgement and ensure you do not post anything that reflects negatively on TC Energy or yourself, or that is discriminatory, offensive, or in poor taste
- Be respectful of others, keeping in mind our Harassment-Free Workplace policies and make sure your comments cannot be seen in a negative light
- Share only approved TC Energy content to ensure you are accurate and add value to the conversation
- Do not disclose confidential, proprietary, or non-public information about TC Energy
- Do not post pictures of TC Energy's facilities or operations unless you are authorized to do so and have received the required approvals
- Never falsely represent yourself

✦ TC Energy recognizes that our personnel use social media for personal use. Personal use of social media must not interfere with your job. Employees should be mindful that personal use of social media can also impact TC Energy, its business relationships, and reputation in the communities it serves.

### Public disclosure of information

TC Energy ensures that public statements regarding the Company are provided in a timely manner, are fair, accurate and complete, comply with legal requirements and corporate policies, and preserve and protect our reputation and brand.

TC Energy has prescribed personnel who are authorized to speak on our behalf. If you receive an inquiry for information or comment, you should direct it to our media line 1-800-608-7859 or by [email](#). Our Communications team will direct the inquiry to the appropriate Company representative for response.




# BEING SOCIALLY RESPONSIBLE AND A GOOD AMBASSADOR

We recognize that we are ambassadors of TC Energy and conduct ourselves in a manner that is respectful and appropriate, and will not harm TC Energy's reputation.

You must always keep in mind that you are a representative of TC Energy. The things you say and do should reflect the Company's core values. You should not speak publicly on behalf of TC Energy unless authorized to do so by the Communications team. Any posting or statement on an external website, including personal sites, social channels or in other media, should be considered a public statement.

Even on your personal time, you must not participate in any illegal or inappropriate statements or activities that could be detrimental to the Company or its reputation.

 You must keep in mind that you are a representative of TC Energy. The things you say and do should reflect the Company's core values.

 **Our Commitment Statement**

 **Indigenous Relations Policy**



# ASSETS AND INFORMATION

- + Protecting personal information
- + Managing and maintaining the security of information
- + Use and protection of TC Energy assets



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## PROTECTING PERSONAL INFORMATION


TC Energy takes seriously the fact that its employees , Contractors, customers and other stakeholders have entrusted the Company with their personal information.

Personal information is any information that on its own or when combined with other information, can be used to identify an individual. Personal information may include, but is not limited to, name, contact information, date of birth, demographics, biometrics, employment history, performance appraisals, training records, Employee or national identification numbers, health or medical records, and banking information.

Use of personal information must be limited to the business purposes for which the information was provided. To the extent that you collect, store, access, or use personal information of any individual as a result of your work with TC Energy, you may not disclose that personal information to others, or use it for a purpose other than that for which it was collected, without the express approval of TC Energy's Privacy Office or the individual's written consent. You should never collect, store, access, use, or disclose personal information for an inappropriate purpose or by inappropriate or illegal means.

If you are ever unsure if information can be disclosed or used for a new purpose, check with TC Energy's [Privacy Office](#) before taking any action.

For more information, please see the Protection of Personal Information Policy.

 **TC Energy is committed to protecting personal information in compliance with all legal requirements and requires that our Contractors share this commitment to information security.**

 **Protection of Personal Information Policy**

You should protect and safeguard personal information from inappropriate access by applying physical, administrative, and technological safeguards (e.g., keeping physical records in a locked cabinet, and keeping electronic records in a password protected or otherwise restricted folder).



# MANAGING AND MAINTAINING THE SECURITY OF INFORMATION

Corporate records are valuable assets of TC Energy and you must ensure appropriate and reasonable efforts are made to manage, protect and preserve these assets.

All of these information assets are important Company records that TC Energy may be required to produce in the event of a legal or regulatory proceeding, audit or investigation. It is important that you manage and retain these assets in accordance with all legal requirements and corporate policies. In particular, you must never destroy an information asset in the event of an actual or pending legal or regulatory proceeding.

All Contractors are responsible for keeping accurate records of their Company business.

## GENERATIVE ARTIFICIAL INTELLIGENCE (AI)

The use of generative AI presents many opportunities; however, misuse can also present potential threats to information assets. To further protect information assets, you must never create, transmit or store non-public Company information on non-TC Energy accounts and must use only Company-approved generative AI software on TC Energy computer systems.

### What are information assets?

- Memos
- Emails
- Accounting records
- Invoices and contracts
- Technical drawings
- Recordings of trade-related phone calls
- Records of safety or other incidents
- Marketing literature
- Other similar protected internal documents

### What form can an information asset take?

An information asset can take any form or on any media, including:

- Paper
- Digital files
- Voice or video recordings
- Text and instant messages
- Other electronic formats



## USE AND PROTECTION OF TC ENERGY ASSETS

If you have been assigned TC Energy assets in order to assist in completion of your contract assignment, you must protect TC Energy's assets and use them only for legitimate contract assignment purposes.

You have an obligation to be a good steward of the assets that TC Energy provides to help you complete your contract assignment and you must protect these assets from loss, theft, damage and misuse.

Additionally, using Company facilities, equipment and/or Company time to work on your personal assets or for personal activities or to store personal information is not allowed.

TC Energy regularly monitors Company internet use, and individuals should not assume any right of privacy with respect to either their use of or data stored on TC Energy's computer systems. Any misuse of Company assets or services, including inappropriate use of TC Energy's computer equipment and systems, may lead to serious consequences including corrective disciplinary action, removal from our site(s) in accordance with the TC Energy's policies and processes, or to termination of the business relationship.

### What are Company assets?

Company assets can include:

- Company time
- Equipment
- Facilities
- Furniture
- Computers
- Telephones
- Supplies
- Tools
- Personal protective equipment
- Corporate credit cards
- Other resources

### What can Company assets NOT be used for?

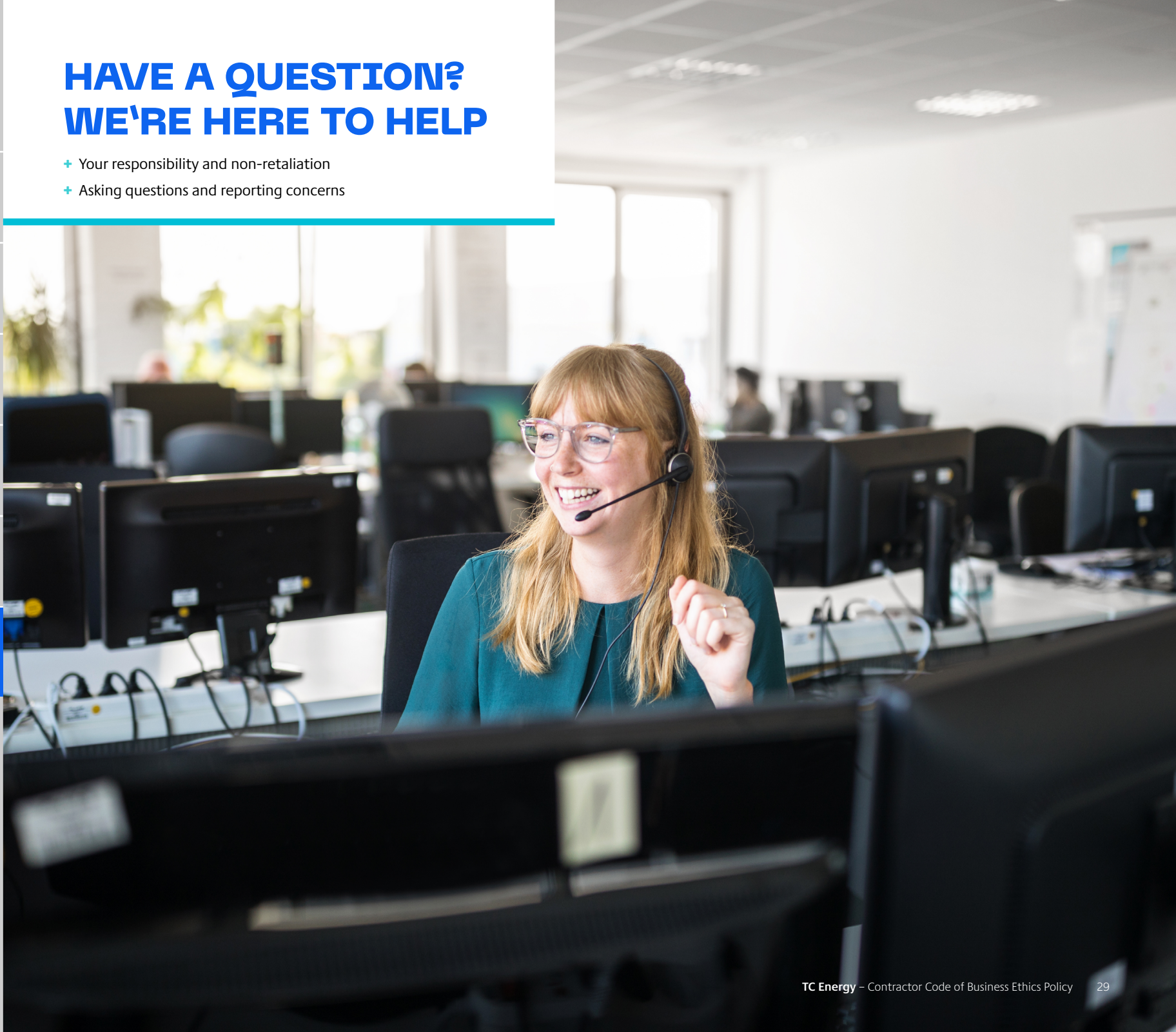
Company assets must never be used for:

- Work on your personal assets or for personal activities
- Engaging in hate-based activities
- Downloading illegal material
- Viewing pornography
- Other inappropriate uses



# HAVE A QUESTION? WE'RE HERE TO HELP

- + Your responsibility and non-retaliation
- + Asking questions and reporting concerns



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## 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 <https://secure.ethicspoint.com/domain/media/en/gui/17825/index.html>. 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.

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# ASKING QUESTIONS AND REPORTING CONCERNS

You are required to report in a timely manner any actual or potential non-compliance with this Policy or any legal obligation so it can be appropriately investigated and addressed. You can do so with confidence that your confidentiality and identity will be protected to the greatest extent possible and that retaliation for good faith reporting is prohibited.

## Ethics Help Line

There may be times when you are not comfortable raising concerns with your TC Energy representative; this is why we have the TC Energy Ethics Help Line.

### ETHICS HELP LINE

Canada / U.S.: 1-888-920-2042

Mexico: 800-283-2783 (if calling from a cell phone)

0-800-283-2783 (if calling from a land line)

[TCEnergy.com/about/governance/code-of-business-ethics](https://www.tce.com/about/governance/code-of-business-ethics)

The Ethics Help Line is operated by an independent third-party service provider and reporting through the Ethics Help Line is confidential and may be done anonymously.

All calls to the Ethics Help Line are free of charge, and can be made in English, French, or Spanish 24 hours a day, seven days a week, 365 days a year.

You may use the Ethics Help Line either to report any actual or suspected issues or to ask questions, including topics such as:

- Accounting irregularities
- Alcohol and drug abuse
- Conflict of interest
- Engineering concerns
- Environment concerns
- Harassment
- Human rights
- Safety
- Theft and fraud
- Workplace violence
- Other improprieties

If the issue raises an immediate threat to safety or security, you should contact Corporate Security, local police or other emergency services as appropriate.

## All reports are taken seriously

Regardless of the means used to report, your report will be taken seriously and it will be investigated and addressed appropriately. If you are reporting through the Ethics Help Line, please make note of your key code for your case file since the investigator may contact you through your case file for further information or clarification prior to initiating an investigation.



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# MAKING THE RIGHT CHOICES — DOING THE RIGHT THING

