

Policy.



Indigenous Relations Policy.

Purpose and scope

The purpose of this Policy is to ensure that Personnel pursue and develop long-term mutually beneficial relationships with Indigenous Groups in support of the Company's business and corporate social responsibility objectives across Canada, the United States, and Mexico.

This Policy sets expectations for and guides the Company's collaborative partnerships with Indigenous Groups aimed at achieving regulatory certainty and maintaining access to land, while supporting such Indigenous Group's capacity-building initiatives and participation in economic opportunities.

Personnel will ensure that implementation of this Policy is consistent with TC Energy's Indigenous Relations Commitment Statement.

This Policy applies to all Personnel.

Policy

1 General provisions

- 1.1 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.
- 1.2 All Personnel conducting business activities on behalf of TC Energy will recognize and respect that Indigenous Peoples may have a collective attachment to the land and resources associated with TC Energy's business activities, and that there are often separate organizational and governance structures and political institutions from those of the jurisdictions they fall under. Personnel will ensure that they are conducting any such business activities with integrity, mutual responsibility, and collaboration.
- 1.3 When engaging in consultation related activities with Indigenous Groups, Personnel will engage with Indigenous Groups in a timely manner, to allow them to identify interests, understand the potential impacts of our business activities and make

decisions freely and openly. Personnel must ensure meaningful and respectful Engagement and dialogue through the use of a principled, transparent and adequate approach, as set out in TC Energy's Indigenous Relations Strategy.

- 1.4 Personnel who are working with Indigenous Groups are expected to take the Company's Indigenous cultural awareness training to help them work more effectively and collaboratively with Indigenous groups.
- 1.5 All Personnel will use every opportunity to engage Indigenous Groups' leadership to:
 - a) align their capacity and capabilities with the Company's project requirements and qualifications;
 - b) support community-led initiatives tailored to local priorities;
 - c) develop skills in the local workforce compatible with industry needs; and
 - d) develop community-led innovative project strategies, reflecting engagement and regulatory outcomes that are defensible and commercially reasonable.

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 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

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

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.

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

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

Indian means an individual who is a member of an Indian tribe, band, or community that is recognized by the United States federal government; who may live on a reservation; who is of 1/4 or more Indian ancestry and includes Native Americans who fall within this description.

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

Personnel means full-time, temporary, and part-time employees and contractors.

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
- Indigenous Relations Strategy

Other references

- [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