

# Policy.



## Communications Policy.

### Purpose and scope

The purpose of this Policy is to outline expectations regarding internal and external communications, including Personnel's personal use of social media to the extent that Personnel may refer to TC Energy or be perceived to be speaking on behalf of the Company.

This Policy applies to all TC Energy Personnel.

### Policy

#### 1 General provisions

- 1.1 The focus of TC Energy communications is to protect and enhance the Company's reputation. Clear communication internally and externally is key to facilitating transparent and informed dialogue with a diverse audience.
- 1.2 TC Energy's communications will be:
  - integrated – reflecting broad communication goals and the needs of all internal parties who have a role in communicating;
  - consistent – aligned with the Brand and consistent across all audiences;
  - timely – providing stakeholders with relevant information in a timely manner and consistent with applicable Securities Laws;
  - clear – reflective of our Company values and clear, concise, relevant, and understandable; and
  - current – external and internal messaging must be accurate and aligned with the Company's communications strategy.
- 1.3 The creation of official Company pages on social media must be approved by the Director of Corporate Communications. All external communications messaging must be approved by the Director for the applicable business unit.

## 2 Designated spokespersons

- 2.1 In order for TC Energy's communications to accurately reflect the Company's policies, goals and objectives, it is essential that Company spokespersons are those individuals who are subject matter experts with comprehensive Company knowledge and formal Media training.
- 2.2 Authorized spokespersons are established in the Public Disclosure Policy.
- 2.3 The authorized spokespersons act as TC Energy's principal spokespersons on Company-wide matters and industry issues, as applicable. TC Energy does not allow the use of third party/external spokespersons for marketing or other communications activities without prior approval by the Director of Corporate Communications and the Vice President of the applicable business unit.
- 2.4 The spokesperson will be directed and permitted by the Communications Department to make statements and/or to issue statements on behalf of TC Energy to the Media. Messaging will be developed and approved by the Communications Department, in consultation with the appropriate content experts.
- 2.5 Company spokespersons must be kept informed about pertinent activities in all parts of the Company and about questions from external stakeholders in order to be effective in external and internal communications. Media contacts or other external contacts of material importance must be reported to the Communications Department.

## 3 Public events

- 3.1 Personnel must obtain written approval from their leader prior to speaking or presenting at Public Events.
- 3.2 If approved to speak or present at Public Events on behalf of the Company, Personnel must:
  - contact the Communications Department to ensure material is aligned to the TC Energy Brand Guidelines;
  - ensure materials are reviewed in advance by their leader and, if information pertains to business operations or disclosing financial information, also reviewed in advance by senior leaders in Corporate Communications & Marketing and Investor Relations & Financial Communications and any other person they deem appropriate;
  - be aware of and prepared for the Media; and
  - follow approved messages and talking points related to the approved presentation or subject matter and not discuss non-public information related to business operations or financial information.
- 3.3 All enquiries from the Media must be directed to the Media Relations Line or the Communications Department.

#### 4 Personal Social Media use

- 4.1 When using personal Social Media while at work or off-duty, Personnel should exercise good judgment and ensure that published comments do not reflect negatively on themselves or the Company.
- 4.2 In accordance with TC Energy's Public Disclosure Policy and to ensure compliance with Securities Laws while using Social Media, Personnel must:
- identify themselves as TC Energy Personnel whenever posting content that may be related to Company interests so as to avoid misleading internet readers and disclose that views are their own and do not necessarily represent the views or opinions of the Company or its management;
  - ensure that they do not disclose confidential, proprietary, or non-public information;
  - use a personal email address; and
  - ensure that they do not link to or speak on behalf of TC Energy.
- 4.3 Personnel who choose to voluntarily participate in Company organized advocacy initiatives must only use approved materials and follow any applicable guidelines provided by the Company.
- 4.4 In accordance with TC Energy's Acceptable Use Policy, Personnel should have no expectation of privacy in any Social Media post, conversation, or message transmitted to, received, or printed from, or stored or recorded on Company resources.
- 4.5 In accordance with TC Energy's Harassment Free Workplace Policy, the posting of Inappropriate Content (not otherwise protected or required by law) on any Media platform may result in legal or disciplinary action, up to and including the termination of employment or contractual relationship.
- 4.6 Nothing in this Policy precludes or dissuades discussions among Personnel about wages, terms, and conditions of employment or other legally protected or required activities.
- 4.7 Questions about what is appropriate to post on Social Media may be directed to the Corporate Communications Department. Personnel may also refer to the TC Energy Social Media Guidelines for more information on acceptable Social Media use. In appropriate circumstances, TC Energy may request revisions to, or the removal of, certain Social Media communications.

#### 5 Third party endorsements

- 5.1 All third-party requests to use TC Energy's logo, name, Company Content, or statements by Personnel in news releases, promotional materials, advertising, or other documentation, electronic or print must be consistent with TC Energy's Brand strategy and approved by the Director of Corporate Communications.

## **6 Co-Branding**

- 6.1 The Company's name, logo or any aspect of TC Energy's visual identity may be used in conjunction with business partners or industry associations in marketing and communications materials where it is to the mutual benefit of both parties. All requests to use TC Energy's logo or name in co-branded promotional materials or advertising must be approved by the External Manager of Corporate Communications & Marketing.

## **7 Photography or filming of company premises**

- 7.1 All requests for photography or filming of Company facilities must be approved by the Manager of Corporate Communications & Marketing.
- 7.2 A photo release form must be completed prior to using any person's photos for marketing or communications materials.

## **8 Use of stock photography and copyright protected materials**

- 8.1 Copyrighted materials include, but are not limited to, music, films, clips from TV shows, videos, illustrations, photography, and any images of well-known or identifiable people. Personnel must obtain usage rights for copyrighted materials prior to use for internal and external communications and marketing purposes.
- 8.2 Use of stock images for marketing and communications materials, both externally and internally, is managed by the Corporate Communications Department. Any use of stock photography used in internal or external communications must come directly from the approved library of stock images and must comply with the TC Energy Corporate Brand Guidelines and all applicable licensing agreements associated with the use of such images.

## **9 Reproduction of company documentation**

- 9.1 Any requests to reproduce, in whole or in part, Company Content must be approved by the Manager of Corporate Communications & Marketing.

## **10 Anti-spam legislation**

- 10.1 Explicit consent for any TC Energy commercial electronic/internet communications must be obtained from the intended recipient in accordance with TC Energy's practices for anti-spam legislation compliance in advance of sending any such communications. Such consent is required in relation to commercial electronic/internet communications sent from and/or received by email addresses within Canada, the U.S. and Mexico.
- 10.2 In cases where external recipients choose to unsubscribe to TC Energy's electronic/internet communications, no further communications may be sent from within TC Energy beyond 10 calendar days from the date the unsubscribe request is

submitted, unless there is a clear legal or regulatory requirement for the communications to continue.

### 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

**Brand** means the visual identity, including images, tone, colors, and fonts that TC Energy uses for all internal and external communications and marketing materials as outlined in the TC Energy Corporate Brand Guidelines.

**Company Content** means materials including, but not limited to, graphs, quotations from print and other visual material and Company information.

**ELT** means TC Energy's Executive Leadership Team.

**Inappropriate Content** means any offensive, defamatory, illegal, or similarly inappropriate content.

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

**Media** means any party in traditional (radio/television/print) and digital media, including social media.

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

**Public Events** means events including conferences, trade shows, recruiting functions, panel discussions, open houses and industry association meetings.

**Social Media** means websites and applications, including blogs, social networking forums such as Facebook and Twitter, LinkedIn and photo/video sharing sites that enable users to create and share content or to participate in social networking.

**Securities Laws** means applicable legislation, regulations and standards concerning securities markets and financial reporting, including those of the Canadian and U.S. securities regulators and the Toronto and New York Stock Exchanges.

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

**Visual Standards** means the standards approved by the Communications Department.

## References

### Related corporate governance and supporting documents

- Code of Business Ethics Policy
- Acceptable Use Policy
- Harassment-Free Workplace Policy (Canada | U.S. | Mexico)
- Trading Policy
- Political Activities and Contributions Policy
- Protection of Personal Information Policy
- Public Disclosure Policy

### Other references

- Social Media Guidelines
- [Brand Guidelines](#)

## How to contact us

- [Policy Questions and Comments](#)
- Corporate Communications
- [Media Relations Line](#)

## TC Energy's reporting channels

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