

TC Energy Sustainable Finance Disclosure Regulations (SFDR) Indicators¹

The table below outlines TC Energy’s preliminary alignment with the European Union’s Sustainable Finance Disclosure Regulation (SFDR), which includes Principal Adverse Impact (PAI) indicators, in accordance with the Regulatory Technical Standards (RTS).

TC Energy is voluntarily disclosing these metrics to enhance transparency and support data collection efforts by European Union financial market participants.

As the SFDR framework and associated guidance continue to evolve, TC Energy will regularly review and update this alignment to maintain its relevancy and accuracy.

This document includes environmental or climate-related content that has been developed with guidance from internationally-recognized methodologies, frameworks, standards and/or recommendations for sustainability reporting, to the extent applicable. Where non-standard measures are used, we have disclosed the information in accordance with our internal standards, which are designed to reflect and be consistent with internationally-recognized methodologies, frameworks, standards and/or recommendations to the extent possible.

Statement of principal adverse impacts of investment decisions on sustainability factors

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS								
SUSTAINABILITY INDICATORS	METRIC (UNIT OF MEASURE)	IMPACT (2024 CALENDAR YEAR)	IMPACT (2023 CALENDAR YEAR)	IMPACT (2022 CALENDAR YEAR)	SOURCE(S)	ACTIONS TAKEN, ACTIONS PLANNED AND TARGETS SET FOR THE NEXT REFERENCE PERIOD		
Greenhouse gas emissions	GHG emissions	Scope 1 GHG emissions (thousand tonnes CO ₂ e)	22,351 ²	21,520	21,748	Report on Sustainability > Performance Data > GHG emissions: Scope 1 (Operational Control Approach)	Report on Sustainability > Our sustainability performance Report on Sustainability > Greenhouse gas emissions Report on Sustainability > Climate-related Disclosures	
		Scope 2 GHG emissions (thousand tonnes CO ₂ e)	426 ²	548	560	Report on Sustainability > Performance Data > GHG emissions: Scope 2 (Operational Control Approach)	Report on Sustainability > Our sustainability performance Report on Sustainability > Greenhouse gas emissions Report on Sustainability > Climate-related Disclosures	
		Scope 3 GHG emissions ³ (thousand tonnes CO ₂ e)	4,178	4,182	4,218	Report on Sustainability > Performance Data > GHG emissions: Scope 3 (Operational Control Approach)	Report on Sustainability > Greenhouse gas emissions Report on Sustainability > Climate-related Disclosures	
		Total Scope 1 and Scope 2 GHG emissions (thousand tonnes CO ₂ e)	22,777	22,068	22,308	Report on Sustainability > Performance Data > GHG emissions: Scope 1 and 2 emissions intensities	Report on Sustainability > Greenhouse gas emissions Report on Sustainability > Climate-related Disclosures	
		GHG intensity	GHG emissions intensity (Scope 1+2 kg CO ₂ e / GJ)	1.05 ³	1.07	1.07	Report on Sustainability > Performance Data > GHG emissions: Scope 1 and 2 emissions intensities	
		Exposure to fossil fuel	Active in the fossil fuel sector (per cent)	TC Energy's business consists of natural gas transportation and storage, as well as power generation assets. Natural gas, defined as a fossil fuel by the International Energy Agency, consists of 93 per cent of our 2024 revenue.	92	92	Report on Sustainability > Our Business 2024 Annual Report	Report on Sustainability > Our Business 2024 Annual Report
	Share of non - renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production from non-renewable energy sources compared to renewable energy sources (percentage of total energy sources)	TC Energy's non-renewable energy consumption and non-renewable energy production from non-renewable energy sources accounts for 100 per cent of our total energy usage. Our primary source of energy consumption is natural gas, which powers the compressor engines of our natural gas transmission system and fuels our natural gas-fired cogeneration units for the production of electricity and heat energy.			Annual CDP Corporate Questionnaire response	Report on Sustainability > Climate-related Disclosures Annual CDP Corporate Questionnaire response	
	Energy consumption intensity	Energy consumption (GWh per million CAD revenue)	2024 data not yet available	660	647	Annual CDP Corporate Questionnaire response	Annual CDP Corporate Questionnaire response	

SUSTAINABILITY INDICATORS		METRIC (UNIT OF MEASURE)	IMPACT (2024 CALENDAR YEAR)	IMPACT (2023 CALENDAR YEAR)	IMPACT (2022 CALENDAR YEAR)	SOURCE(S)	ACTIONS TAKEN, ACTIONS PLANNED AND TARGETS SET FOR THE NEXT REFERENCE PERIOD
Biodiversity	Activities negatively affecting biodiversity sensitive areas	Sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas ⁴ (per cent)	14	13	13	Data represents land owned, leased and or operated within areas of protected conservation status or endangered species habitat. Report on Sustainability > Performance Data > Ecological impacts	Report on Sustainability > Our sustainability performance Report on Sustainability > Environmental management Safeguarding Biodiversity Our approach
Water	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	Indicator not directly applicable to TC Energy. Our commitment to protecting the environment includes managing our interactions with water responsibly. Recognizing the importance of water to ecosystems and communities alike, we implement environmental protection measures informed by regulatory requirements and input from stakeholder and Indigenous engagement when crossing waterbodies during construction or using water to test the integrity of our pipelines.			Report on Sustainability > Performance Data > Ecological impacts	Report on Sustainability > Our sustainability performance Report on Sustainability > Environmental management > Water Protecting Water
Waste	Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	Indicator not directly applicable to TC Energy. Internal waste management procedures are in place, aligned with applicable federal, state and provincial environmental statutes, laws and regulations.			Report on Sustainability > Performance Data > Ecological impacts	Report on Sustainability > Our sustainability performance Report on Sustainability > Environmental management > Waste
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS							
Social and employee matters	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	We are not aware of any violations of the United Nations Global Compact (UNGC) Principles, and maintain good standing with UNGC participation. We actively engage with ESG rating agencies to respond to controversy allegations. We strive to uphold the UNGC principles across all aspects of our business. We maintain transparency and accountability as integral parts of our business practices and take seriously our responsibility to uphold these principles across all aspects of our business.			Report on Sustainability > UN SDG alignment Code of Business Ethics (COBE) Policy Contractor Code of Business Ethics (COBE) Policy	Embedding the United Nations Global Compact Principles into TC Energy's Strategy
	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Lack of policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	In 2022, TC Energy became an official participant of the UNGC . As a committed participant in the UNGC, TC Energy supports the Ten Principles of the UN Global Compact on human rights, labour, environment and anti-corruption. We take action against all forms of discrimination, stand firmly against forced labour and child labour, provide good quality working conditions and living wages for all employees, and require the same of our contractors. Our annual Report on Sustainability details the actions we've taken to implement the UNGC principles and serves as our Communication on Progress (CoP). TC Energy's Code of Business Ethics (COBE) and Contractor COBE Policies, applicable to all employees and contractors, reinforces behavioral requirements and expectations and provides guidance in relation to responsible business conduct.			Report on Sustainability > UN SDG alignment Code of Business Ethics (COBE) Policy Contractor Code of Business Ethics (COBE) Policy	Embedding the United Nations Global Compact Principles into TC Energy's Strategy
	Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	In 2024, we completed a comprehensive review of our Canadian compensation programs, policies and structures, in alignment with Canadian Federal Pay Equity legislation.			Report on Sustainability > People and culture	Report on Sustainability > People and culture
	Board gender diversity	Average ratio of female to male board members of all board members ⁵ (per cent)	40	38	38	Report on Sustainability > Performance data > Governance characteristics	Report on Sustainability > Corporate Governance Board Diversity Policy

Additional climate and other environment-related indicators

SUSTAINABILITY INDICATORS	METRIC (UNIT OF MEASURE)	IMPACT (2024 CALENDAR YEAR)	IMPACT (2023 CALENDAR YEAR)	IMPACT (2022 CALENDAR YEAR)	SOURCE(S)
Emissions	Emissions of air pollutants ⁶ (metric tonnes)	TOTAL: 38,173 Nitrogen oxide (NO _x) = 36,023 Sulfur oxide (SO _x) = 175 Volatile organic compounds (VOCs) = 1,279 Particulate matter 10 micrometers (PM ₁₀) = 696	TOTAL: 37,457 Nitrogen oxide (NO _x) = 35,267 Sulfur oxide (SO _x) = 195 Volatile organic compounds (VOCs) = 1,301 Particulate matter 10 micrometers (PM ₁₀) = 694	TOTAL: 43,133 Nitrogen oxide (NO _x) = 40,973 Sulfur oxide (SO _x) = 143 Volatile organic compounds (VOCs) = 1,324 Particulate matter 10 micrometers (PM ₁₀) = 693	Report on Sustainability > Performance data > Air Quality
Energy performance	Breakdown of energy consumption by type of non-renewable sources of energy (total fuel MWh consumed by the organization)	2024 data not yet available	Natural gas: 99,861,130 Oil: 687	Natural gas: 91,511,653 Oil: 693	Annual CDP Corporate Questionnaire response
Water, waste and material emissions	Water usage and recycling (million cubic metres)	TC Energy does not report on water recycled, however we do report: <ul style="list-style-type: none">Water discharge⁷: 0.33Water consumption⁸: 1.46	<ul style="list-style-type: none">Water discharge⁷: 0.74Water consumption⁸: 1.57	<ul style="list-style-type: none">Water discharge⁷: 0.20Water consumption⁸: 1.97	Report on Sustainability > Performance Data > Ecological impacts

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

SUSTAINABILITY INDICATORS	METRIC (UNIT OF MEASURE)	IMPACT (2024 CALENDAR YEAR)	IMPACT (2023 CALENDAR YEAR)	IMPACT (2022 CALENDAR YEAR)	SOURCE(S)
Social and employee matters	Lack of a workplace accident prevention policies	Our overarching management system, TOMS, enables operational excellence through an interconnected set of standards, processes and procedures that describes the requirements to manage risk and continually improve through the plan, do, check, act cycle. These requirements drive our approach to identify, analyze, evaluate, manage, monitor, and communicate risks and implement mitigation strategies for the asset lifecycle, including major accident hazards ⁹ .			Report on Sustainability > Management system transformation Report on Sustainability > Employee and contractor safety Report on Sustainability > Emergency preparedness and response
	Rate of accidents (number of employee fatalities)	0	4	0	Report on Sustainability > Performance Data > Occupational safety, health and industrial hygiene
	Days lost to injuries, accidents, fatalities or illness (number)	TC Energy does not report on Days lost to injuries, accidents, fatalities or illness, however we do report: <ul style="list-style-type: none">Recordable case rate¹⁰ (combined employee and contractor, per 200,000 hours worked): 0.57High energy serious injury and fatality rate¹¹ (combined employee and contractor, per 100 million hours worked): 11.60	<ul style="list-style-type: none">Recordable case rate¹⁰ (combined employee and contractor, per 200,000 hours worked): 0.58High energy serious injury and fatality rate¹¹ (combined employee and contractor, per 100 million hours worked): 26.20	<ul style="list-style-type: none">Recordable case rate¹⁰ (combined employee and contractor, per 200,000 hours worked): 0.85High energy serious injury and fatality rate¹¹ (combined employee and contractor, per 100 million hours worked): 30.70	Report on Sustainability > Performance Data > Occupational safety, health and industrial hygiene
	Lack of a supplier code of conduct	We expect our Contractors to meet the same standards as TC Energy and our Contractor Code of Business Ethics (COBE) Policy reinforces the requirements and expectations for conducting business with us or on our behalf.			Contractor Code of Business Ethics (COBE) Policy Doing business with us
	Lack of grievance/complaints handling mechanism related to employee matters	Our Code of Business Ethics (the Code) incorporates principles of good conduct and ethical and responsible behaviour to guide our decisions and actions and the way we conduct business. The Code applies to all employees, officers and directors as well as contract workers of TC Energy and its wholly-owned subsidiaries and operated entities in countries where we conduct business. All employees (including executive officers) and directors must certify their compliance with the Code. Any unusual behaviour or suspected violations of the Code must be reported immediately. Employees can report a concern to their supervisor, Corporate Compliance, Internal Audit, their Compliance coordinator or to our ethics help-line. The ethics help-line allows anyone – employees, contractors, consultants, other stakeholders and the general public – to report a concern, confidentially and anonymously, about any perceived accounting irregularities, legal or ethical violations or other suspected breaches of the Code. The telephone number is published on our website and employee intranet, in other employee communications and in our Annual Report.			Report on Sustainability > Business ethics and compliance Code of Business Ethics (COBE) Policy Harassment-free Workplace Policies: Canada , U.S. , Mexico 2025 Management Information Circular 2024 Annual Report

SUSTAINABILITY INDICATORS	METRIC (UNIT OF MEASURE)	IMPACT (2024 CALENDAR YEAR)	IMPACT (2023 CALENDAR YEAR)	IMPACT (2022 CALENDAR YEAR)	SOURCE(S)
Social and employee matters	Insufficient whistleblower protection	TC Energy's Code of Business Ethics (COBE) Policy and Contractor Code of Business Ethics (COBE) Policy strictly prohibits reprisals or retaliation against anyone who files an ethics concern or complaint in good faith.			Code of Business Ethics (COBE) Policy Contractor Code of Business Ethics (COBE) Policy Report on Sustainability > People and culture Report on Sustainability > Business ethics and compliance 2025 Management Information Circular
	Incidents of discrimination	Data is not publicly available. The purpose of TC Energy's Equal Employment Opportunity and Non-Discrimination Policy is to ensure no barriers or discrimination exist regarding any aspect of employment for TC Energy employees and job applicants, and to outline TC Energy's commitment to equal employment opportunities.			Equal Employment Opportunity and Non-Discrimination Policy Report on Sustainability > People and culture
Human Rights	Lack of a human rights policy	Human rights is considered a principle of good conduct and ethical and responsible behaviour, and is covered our Code of Business Ethics (COBE) Policy and Contractor Code of Business Ethics (COBE) Policy.			Code of Business Ethics (COBE) Policy Contractor Code of Business Ethics (COBE) Policy Embedding the United Nations Global Compact principles into TC Energy's strategy 2024 Forced Labour and Child Labour in Supply Chains Report Report on Sustainability > Human rights
	Lack of due diligence	TC Energy has processes to identify, prevent, mitigate and address human rights, as reflected in our Code of Business Ethics (COBE) Policy and Contractor Code of Business Ethics (COBE) Policy.			Code of Business Ethics (COBE) Policy Contractor Code of Business Ethics (COBE) Policy Embedding the United Nations Global Compact principles into TC Energy's strategy 2024 Forced Labour and Child Labour in Supply Chains Report Report on Sustainability > Human rights
	Lack of processes and measures for preventing trafficking in human beings	TC Energy stands firmly against the use of 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, including the contractors we do business with. TC Energy's Code of Business Ethics (COBE) Policy and Contractor Code of Business Ethics (COBE) Policy details the processes established to identify, prevent, mitigate, and address human rights issues.			Code of Business Ethics (COBE) Policy Contractor Code of Business Ethics (COBE) Policy Embedding the United Nations Global Compact principles into TC Energy's strategy 2024 Forced Labour and Child Labour in Supply Chains Report Report on Sustainability > Human rights
	Operations and suppliers at significant risk of incidents of child labour	TC Energy's 2024 Forced Labour and Child Labour in Supply Chains Report outlines our governance processes, current measures, and ongoing progress to prevent and mitigate the risks of modern slavery - including child labour - throughout our supply chain.			2024 Forced Labour and Child Labour in Supply Chains Report
	Operations and suppliers at significant risk of incidents of forced or compulsory labour	TC Energy's 2024 Forced Labour and Child Labour in Supply Chains Report outlines our governance processes, current measures, and ongoing progress to prevent and mitigate the risks of modern slavery - including forced or compulsory labour - throughout our supply chain.			2024 Forced Labour and Child Labour in Supply Chains Report
	Identified cases of severe human rights issues and incidents (number)	Our Code of Business Ethics (the Code) incorporates principles of good conduct and ethical and responsible behaviour to guide our decisions and actions and the way we conduct business. Any waiver of the Code for our executive officers and directors must be approved by the Board, or the appropriate committee. There were no such waivers or material departures from the Code in 2024.			Code of Business Ethics (COBE) Policy 2025 Management Information Circular
Anti-corruption and anti-bribery	Lack of anti-corruption and anti-bribery policies	TC Energy's Avoiding Bribery and Corruption Policy, in conjunction with our Code of Business Ethics (COBE) Policy and and Contractor Code of Business Ethics (COBE) Policy, provides our employees and contractors with the appropriate tools for making business decisions that comply with all applicable anti-bribery and anti-corruption laws and regulations for each jurisdiction in which we conduct business.			Avoiding Bribery and Corruption Policy Code of Business Ethics (COBE) Policy Contractor Code of Business Ethics (COBE) Policy Embedding the United Nations Global Compact principles into TC Energy's strategy
	Convictions and amount of fines for violation of anti-corruption and antibribery laws (number)	Our Code of Business Ethics (the Code) incorporates principles of good conduct and ethical and responsible behaviour to guide our decisions and actions and the way we conduct business. Any waiver of the Code for our executive officers and directors must be approved by the Board, or the appropriate committee. There were no such waivers or material departures from the Code in 2024.			Code of Business Ethics (COBE) Policy 2025 Management Information Circular

¹

The information provided is a reflection of TC Energy's operations and is not representative of investments or investee companies. Further information related to our performance data methodologies, boundaries, assumptions and other relevant details can be found in our [Report on Sustainability: Performance Data](#)

²

TC Energy has obtained independent limited assurance of operational control boundary Scope 1 and Scope 2 GHG emissions for the year ended December 31, 2024.

³

Scope 3 GHG emissions cover 15 categories of which, we currently report on five relevant categories. Scope 3 emission categories reported are based on the operational control reporting boundary.

⁴

TC Energy considers land to be an area of protected conservation status or endangered species habitat if it is identified as such in one or more of the publicly available datasets we use. While not an exact match, in 2024 we selected multiple publicly available datasets that included conservation status and habitat information that most closely aligned to the intent of SASB indicator EM-MD-160a.2. We continue to identify critical habitat for endangered species.

⁵

As of December 31, 2024. See our [2025 Management Information Circular](#) and TC Energy's [website](#) for subsequent updates.

⁶

Air quality emissions data, covering all operated assets - including those in the U.S. and Mexico - is calculated in accordance with regulatory requirements in each jurisdiction of operation, and includes emissions at or above applicable reporting thresholds.

⁷

Starting in 2023, we improved our water discharge reporting to include water discharged or dispersed over land in or near the same watershed from which it was withdrawn in accordance with permitting requirements and applicable water quality standards.

⁸

Water consumption volume reflects management's best estimate. TC Energy considers water consumed unless it is either discharged directly to the same source at equal or higher quality or dispersed over land in or near the same watershed from which it was withdrawn, in accordance with permitting requirements and applicable water quality standards. The volume reported includes water used for power asset operations (excluding once-through cooling water) and water used during hydrostatic testing of pipelines and liquids storage tanks that could not be discharged. Water used during construction or operational activities (e.g. for dust control on access roads, construction of winter access or to assist in hydrovac operations) is excluded.

⁹

A source of harm that has the potential to cause a major accident with consequences involving:

- A loss of containment/control resulting in a fire/explosion and multiple fatalities
- Catastrophic damage to the environment
- Catastrophic damage or loss of owned assets
- A work or transportation incident resulting in multiple fatalities

¹⁰

Consistent with industry best practice, TC Energy defines total recordable case rate as the number of recordable cases related to a common exposure base of 200,000 hours (100 full-time employees). Recordable cases are all work-related deaths and illnesses and those work-related injuries that result in a loss of consciousness, restriction of work or motion, transfer to another job or require medical treatment beyond first aid.

¹¹

TC Energy defines high-energy serious injury and fatality (HSIF) as an incident involving a release of high energy (greater than 500 ft-lbs of physical energy) without direct control, resulting in a life-threatening or life-altering injury.