

Policy.



Data and Information Policy.

Purpose and scope

This Policy describes the expectations and requirements for the security, integrity, quality, reliability and availability of TC Energy Data and Information throughout their lifecycle in alignment with applicable legislation and the Company's corporate governance documents to guard against inappropriate access, loss or disposition.

This Policy applies to all TC Energy Personnel and Excluded Contractors.

Policy

1 Ownership of Data and Information

- 1.1 All Data and Information is property of TC Energy and must be used, managed and retained only for Company Business and protected from unauthorized or inappropriate access or use as outlined in the Code of Business Ethics (COBE) Policy, Contractor COBE Policy, Acceptable Use Policy, Artificial Intelligence Policy, Cybersecurity Policy, Inter-Affiliate Codes and Protection of Personal Information Policy.
- 1.2 Personnel and Excluded Contractors must understand how to protect Data and Information classified as:
 - a) Regulated Information or Non-Regulated Information in accordance with the Inter-Affiliate Codes; and
 - b) Personal Information in accordance with the Protection of Personal Information Policy.
- 1.3 All Data and Information requires a designated business group-specific owner, who is accountable and responsible for meeting Data and Information requirements in accordance with this Policy, the Data Management Standard and Information Governance Standard.

2 Records management

- 2.1 Personnel and Excluded Contractors must keep accurate Records of their Company Business.
- 2.2 All Records must be stored and managed in the appropriate designated Company storage and retrieval system.
- 2.3 Personnel and Excluded Contractors must ensure that all Records are retained and disposed of in accordance with the Company's Records Retention Schedule, unless a Legal Hold notice applies to the Records in which case the Legal Hold notice is paramount.
- 2.4 Transitory Records should be disposed of as soon as they are no longer required.
- 2.5 The electronic version will be the official Record of retention with the exception of those identified by the Records Retention Schedule. Imaged documents must comply with the minimum requirements outlined in the Information Governance Standard.

Your responsibility

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

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.

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; 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.

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). Information may either be a Record or a Transitory Record.

Inter-Affiliate Codes means, collectively, the Canadian Gas Pipelines Code of Conduct, the TransCanada PipeLines Limited Canadian Mainline Bid Floor Personnel Information Policy, the U.S. Federal Energy Regulatory Commission Standards of Conduct for Transmission Providers, the U.S. *Interstate Commerce Act*, and the TC Energía Code of Conduct.

Legal Hold means a directive issued by TC Energy legal counsel to preserve Data and Information and/or tangible things potentially relevant to litigation or a claim, actual or anticipated, a governmental investigation or request, or other legal matters.

Non-Regulated Information means Information that is not Regulated Information.

Personal Information means any information on its own or when combined with other information, which can be used to identify an individual. Personal Information may include but is not limited to: employee number, name, contact information (personal and business addresses, phone numbers and emails), date of birth and age, gender or sex, sexual orientation, race, religious affiliation, ethnic origin, marital or family status, political belief, disability, medical information, health care identification number, biometrics, voice recording, photographs, video, salary, benefits, banking information (credit card and bank accounts), Social Security Number (SSN) or Social Insurance Number (SIN), National Identification Number, licenses (including membership numbers), passport numbers, training records, employment history, resumes, opinions about the person (including references, interview notes, performance appraisals, and succession plans) and identifying remarks, and any similarly sensitive or private information. Personal Information includes Protected Health Information (PHI) and sensitive financial information, which might be subject to enhanced protection and disclosure requirements depending on the jurisdiction. Personal Information excludes Aggregated Information.

Personnel means full-time, part-time and temporary Employees and Contingent Workforce Contractors of TC Energy.

Protected Health Information (PHI) means all individually identifiable health and medical information held or transmitted by TC Energy or a third-party stakeholder. PHI includes any details about people's past, present or future physical or mental health and any healthcare provided; past, present or future payment or other benefits details for the provision of healthcare to people; or people's accommodation requests for medical reasons.

Record means Information, however recorded or stored, providing evidence of activities performed or considered, and/or decisions made pursuant to legal obligations or in a transaction of Company Business.

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.

Transitory Record means Information that has short-term value, helps complete a routine Company Business activity or prepares a Record, and is not needed as evidence.

References

Related corporate governance and supporting documents

- Acceptable Use Policy
- Artificial Intelligence Policy
- Code of Business Ethics Policy
- Cybersecurity Policy
- Data Management Standard
- Protection of Personal Information Policy
- Information Governance Standard
- Records Retentions Schedule

Other References

- Management System Document Standard
- Inter-Affiliate Codes
- Legal Holds at TC Energy

How to contact us

- [Information Governance department](#)
- [Data Governance department](#)
- [Policy Questions and Comments](#)

TC Energy's reporting channels

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