

Policy.



Cybersecurity Policy.

Purpose and scope

The purpose of this Policy is to describe the Company's expectations regarding the safe, reliable, and confidential usage of Digital Assets and Digital Information at TC Energy.

This Policy applies to all Digital Asset Owners, Digital Asset Managers, Information Owners and authorized Employees and Contractors with cybersecurity responsibilities for any of TC Energy's Digital Assets and Digital Information.

Policy

1 General provisions

- 1.1 Use of Digital Assets must comply with all applicable legal requirements, Acceptable Use Policy, Code of Business Ethics (COBE) Policy, Information Management Policy, and Protection of Personal Information Policy.

2 Digital Asset owners

- 2.1 Digital Asset Owners must maintain a digital inventory of all Digital Assets they are accountable for in a repository approved by the Cybersecurity Office. The digital inventory must include a clearly identified Digital Asset Owner and Digital Asset Manager.
- 2.2 Digital Asset Owners must ensure the digital inventory of all Digital Assets is available at all times to the Cybersecurity Office for risk management purposes.
- 2.3 Digital Asset Owners must ensure Digital Assets they are accountable for conform to TC Energy's Cybersecurity Standards throughout a Digital Asset's lifecycle (i.e., before, during and after the use of such Digital Assets).

3 Information Owners

- 3.1 Information Owners must maintain a digital inventory of all Digital Information repositories.

- 3.2 Information Owners must ensure the metadata attached to the Digital Information they are accountable for identifies the Information Owner and contains the classification of the Information. Information classification must be in accordance with TC Energy's Information Management Policy.
- 3.3 Information Owners must ensure the Digital Information inventory is available at all times to the Cybersecurity Office for risk management purposes.

4 Access management

- 4.1 Digital Asset Owners must ensure digital and physical access to the Digital Assets they are accountable for are restricted to authorized Employees and Contractors in accordance with the Principle of Least Privilege.
- 4.2 Information Owners must ensure digital access to the Digital Information they are accountable for is restricted to authorized Employees and Contractors in accordance with the Principle of Least Privilege.
- 4.3 Personnel designated by Digital Asset Owners and Information Owners to approve access to Digital Assets or Digital Information must review access on the intervals defined in the Company's Cybersecurity Standards to ensure Principle of Least Privilege is maintained.

5 Non-conformance reporting

- 5.1 In addition to the reporting requirements described in the Your Responsibility section of this Policy, Information Owners, Digital Asset Owners and their authorized Employees and Contractors with cybersecurity responsibilities must also report all known non-conformances with this Policy using the Cybersecurity Non-Conformance Process.

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](#). 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

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 premises.

Contractor means a third party hired by TC Energy to perform services for or supply equipment, materials, or goods to the Company. Contractors include, without limitation, Contingent Workforce Contractors and Excluded Contractors.

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 (Canada and the U.S.) and monthly (Mexico); 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.

Digital Asset means any network device, computer system, application, data storage systems, or service (and associated data required for operation). This includes, but is not limited to, laptops, tablets, smartphones, and removable media.

Digital Asset Manager (DAM) means responsible for ensuring a Digital Asset's day-to-day maintenance and operations (including up-to date inventory, spend optimization, license management, vendor contracts) are in compliance with TC Energy policies, standards, and applicable legal (including without limitation Cybersecurity and Privacy) requirements.

Digital Asset Owner (DAO) means a Vice-President or above accountable for TC Energy Digital Asset's risk management, lifecycle management, financial investments, contract management, and compliance with TC Energy policies, standards, and applicable legal

(including without limitation Cybersecurity and Privacy) requirements. The DAO may assign responsibilities of TC Energy Digital Asset to DAO Delegate.

Digital Asset Owner Delegate (DAOD) is responsible for TC Energy Digital Asset's risk management, lifecycle management, financial investments, contract management, and compliance with TC Energy policies, standards, and applicable legal (including without limitation Cybersecurity and Privacy) requirements. The DAOD is a Manager or above assigned by the DAO in their reporting structure.

Digital Information means any Information that exists in a digital form.

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 and 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.

Information Owner means Personnel designated by the business group to be accountable for the confidentiality, quality, integrity, availability, use and disposition of Information created and used to carry out Company Business.

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

Principle of Least Privilege means the practice of restricting access and assignment of privileges based on an individual's job classification, job function, and the person's authority to access specific Digital Assets. It ensures users have an appropriate level of access to and within an application or system.

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.

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
- Code of Business Ethics Policy
- Information Confidentiality and Security Classification Process
- Cybersecurity Standards
- Information Management Policy
- Protection of Personal Information Policy

Other references

- Cyber safety 1TC webpage
- Cybersecurity Non-Conformance Process

How to contact us

- [Cybersecurity Office](#)
- [TC Energy Service Desk](#)
- [Policy Questions and Comments](#)

TC Energy's reporting channels

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