

Information Sheet

Oversight and policies on lobbying, political contributions and corporate memberships

The Governance committee of the Board of Directors oversees lobbying, political contributions and corporate memberships. It receives a report annually that provides information on our lobbying activities, a complete list of our political contributions and a detailed list of our corporate memberships, including industry associations and policy organizations. We pride ourselves on being a company that all our stakeholders can count on to make the right choices and do the right thing.

Policies

TC Energy has several policies pertaining to lobbying activities and political contributions, each of which applies to all directors, officers and employees as well as contractors:

Avoiding Bribery and Corruption Policy

TC Energy prohibits the payment of bribes and kickbacks, or provision to government officials of gifts, entertainment or something of value, intended to improperly influence a government official's decisions or actions in the performance of his or her duties. TC Energy also prohibits the offer or provision of facilitation payments. This policy outlines TC Energy's expectations of personnel regarding integrity-based business practices to avoid the occurrence or even the appearance of improper or illegal conduct and to encourage ethical behaviour in all of TC Energy's business.

Code of Business Ethics

Our Code of Business Ethics (COBE) provides personnel with the expected standards of conduct to ensure our reputation for honesty, integrity and reliability is maintained. COBE states that we respect the political process and only make political contributions and engage in lobbying activities that are legal and transparent. COBE refers our personnel to the Avoiding Bribery and Corruption Policy for more specific guidance on those issues.

Political Activities and Contributions Policy

This internal policy:

- sets out the role of our government relations department and provides guidance to TC Energy's personnel to ensure ethical behaviour when dealing with government officials
- outlines expectations around lobbying compliance for all TC Energy personnel who engage in lobbying activities
- outlines the criteria for TC Energy's contributions to political organizations and candidates for public office

TC Energy is committed to actively managing public policy issues that have an impact on our company. The company engages in the public policy process by participating in direct advocacy of governments, as well as working with third parties, such as industry associations. As part of this commitment, the company focuses on constructive engagement and support of the political process through contributions to political organizations and political campaigns to the extent permitted by applicable law.

TC Energy is non-partisan and participates in the political process only when permitted by applicable law, in accordance with company policies, and in a responsible and ethical way that serves the best interests of the company and its stakeholders.

In Canada and the United States, TC Energy makes political contributions in regions where TC Energy conducts business that comply with the laws of the respective region. TC Energy does not make political contributions in Mexico. All political contributions are to be approved at the director level or above in the Public Affairs Canada or Public Affairs U.S. department.

In the U.S.:

- All non-U.S. personnel are strictly prohibited from having any role, direct or indirect, in making political contributions or participating in any political action committee activities.
- No corporate funds may be used to make political contributions to candidates and political committees in federal elections.
- Only funds generated from U.S. operations may be used to make corporate political contributions to state/local candidates, where permitted by law, shall comply with all applicable laws and regulations.

In 2019, TC Energy spent approximately C\$6,000 on political contributions in Canada.

Political Action Committee

TransCanada USA Services Inc., a U.S. subsidiary of TC Energy Corporation, established the TransCanada USA Services Inc. Political Action Committee in 2012 to make political contributions in connection with federal, state and local elections in the U.S. using funds voluntarily donated by eligible employees of TransCanada USA Services Inc. The TransCanada USA Services Inc. Political Action Committee is administered in compliance with the restrictions and requirements of the Federal Election Campaign Act of 1971, as amended (FECA), and the rules and regulations of the Federal Election Commission, which administers FECA.

A total of US\$212,000.00 was disbursed by the Political Action Committee in 2019. More information on disbursements made by the TransCanada USA Services Inc. Political Action Committee can be found at www.fec.gov.

Lobbying

Recognizing that TC Energy's business can be significantly impacted by government actions and decisions, the company works continuously to build and maintain positive and constructive relationships with government officials at all levels. This allows TC Energy to gain trust and respect in the public sector, obtain government support for its activities and initiatives, and to contribute to and collaborate with the communities where the company operates.

TC Energy maintains registrations for in-house lobbyists where required by law. Our lobbying activities are registered in various jurisdictions in Canada and the U.S., many of which provide public disclosure with details of registrations. Links to each of the lobbyist registrations, where available, can be found in Appendix A.

In addition, our consultant lobbyists in all jurisdictions are expected to comply with all applicable laws and filing requirements.

Corporate memberships

TC Energy is a member of various trade associations and policy organizations across our lines of business. Our primary purpose for involvement in trade associations is to support business efforts and participate in technical and industry discussions. Trade associations also provide opportunities for our employees to engage in professional development and networking. While trade associations and policy organizations may use membership fees for lobbying purposes, TC Energy does not direct how membership fees are used and payment of membership fees does not necessarily reflect significant involvement with the trade association or policy organization from a policy perspective. Our participation in a specific trade association or policy organization does not signify comprehensive support for all positions undertaken by the associations. TC Energy's approval process for membership in these organizations requires vice-president-level approval.

Approval of memberships involves consideration of the following:

- the objectives of the association
- the association's affiliations
- the benefits provided to TC Energy
- the cost of the membership
- whether the membership aligns with TC Energy's strategic focus
- whether there are other alternatives to membership that would provide the same benefits

The public affairs team is responsible for payments and maintains a roster of memberships. This process has been established to ensure TC Energy receives value from its memberships. In addition, the governance committee of the Board of Directors receives a report annually on our memberships in trade association and policy organizations, including a detailed discussion of our key memberships and their value to TC Energy.

List of memberships

The most significant corporate memberships that TC Energy maintains, in Canada and the U.S., from a policy perspective are the following:

- American Petroleum Institute
- Association of Oil Pipe Lines
- Interstate Natural Gas Association of America
- Canadian Energy Pipeline Association

The following is a list of industry associations and policy organizations, in Canada and the U.S. that received more than \$50,000 from TC Energy in 2019. We have also included industry associations and policy organizations where we play a significant role in contributing to their policy stance, even if payments did not exceed \$50,000.

- American Gas Association
- American Petroleum Institute
- Association of Oil Pipe Lines
- Association of Power Producers of Ontario
- Business Council of Alberta
- Business Council of Canada
- Business Roundtable
- Canadian Association of Petroleum Producers – Oil Sands CEO Council Levy
- Canadian Electricity Association
- Canadian Energy Pipeline Association
- Canadian Gas Association
- Electric Power Research Institute
- Fraser Institute
- Gartner Global Ltd.
- Greater Houston Partnership
- Interstate Natural Gas Association of America

- Ivey Energy Policy and Management Centre on the Energy Consortium
- Marcellus Shale Coalition
- National Association of Manufacturers
- National Petroleum Council
- Northwest Gas Association
- Ontario Energy Association
- Pipeline Research Council International
- U.S. Common Ground Alliance
- United States Chamber of Commerce

Appendix A

Canada

[Federal](#)

[Alberta](#)

[British Columbia](#)

[Saskatchewan](#)

[Ontario](#)

[Quebec](#)

United States

Federal ([Senate](#) and [House](#))

[Illinois](#)

[Louisiana](#)

[Maine](#)

[Maryland](#)

[Michigan](#)

[Minnesota](#)

[Mississippi](#)

[Missouri](#)

[Montana](#)

[Nebraska](#)

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[Ohio](#)

[Oregon](#)

[Pennsylvania](#)

[South Dakota](#)

[Tennessee](#)

[Virginia](#)

[Washington](#)

[West Virginia](#)

[Wisconsin](#)