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April 22, 2025

Filed Electronically

Canada Energy Regulator  
Suite 210, 517 Tenth Avenue SW  
Calgary, AB T2R 0A8

**Attention: Ramona Sladic, Secretary of the Commission**

**Dear Ramona Sladic:**

**Re: TC Energy Corporation (TC Energy)  
Canadian Gas Pipelines Code of Conduct  
Compliance Report for the Year Ended December 31, 2024**

In accordance with section 5.3 of the Canadian Gas Pipelines Code of Conduct (Code) and its accompanying Compliance Plan (Plan), TC Energy is filing its Compliance Report for the year ended December 31, 2024.

This filing will also be posted on TC Energy's Customer Express website at the [Canadian Gas Pipelines Code of Conduct page \(tccustomerexpress.com\)](https://tccustomerexpress.com).

If you have any questions or concerns with respect to the enclosed, please contact the undersigned at [jim\\_anderson@tcenergy.com](mailto:jim_anderson@tcenergy.com).

Yours truly,  
**TC Energy Corporation**

*Original signed by*

James P. Anderson  
**Manager**  
Inter-Affiliate, Compliance Training & Policy Services

Enclosure

cc: Tolls, Tariff, Facilities & Procedures Committee  
Tolls Task Force

**COMPLIANCE REPORT:  
CANADIAN GAS PIPELINES CODE OF CONDUCT  
FOR YEAR ENDING DECEMBER 31, 2024**

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## **INTRODUCTION**

### **1.1 Reporting Obligation**

This Compliance Report (Report) is prepared pursuant to section 5.3 of the Canadian Gas Pipelines Code of Conduct (Code) and its accompanying Compliance Plan (Plan). The Code applies to TransCanada PipeLines Limited (TCPL) in relation to the TCPL Mainline and TCPL's wholly-owned, federally regulated gas pipelines in Canada which are NGTL GP Ltd., as general partner on behalf of NGTL Limited Partnership, Foothills Pipe Lines Ltd. and Great Lakes Pipeline Canada Ltd. (collectively, the Pipelines).

The Report must be filed with the Canada Energy Regulator (CER) within 120 days of the previous calendar year end. This Report is for the period from January 1, 2024, to December 31, 2024, (the Reporting Period). Capitalized terms used in this Compliance Report have the meaning attributed to the terms in the Code, unless otherwise defined.

### **1.2 Contents of the Report**

Pursuant to section 5.3 of the Code, the Report shall be prepared annually and will include the following information prepared in respect to the Reporting Period:

- a) a list of all Services Agreements in effect at any time during such period;
- b) a corporate organization chart for TCPL and its Affiliates indicating relationships and ownership percentages;
- c) an overall assessment of compliance with the Code;
- d) an assessment of the effectiveness of the Compliance Plan and any recommendations for modifications thereto;
- e) in the event of any material non-compliance with the Code, a comprehensive description thereof and an explanation of all steps taken to correct such non-compliance;
- f) subject to the confidentiality provisions of Section 4 of the Code, a summary of disputes, complaints and inquiry activity during the year;
- g) a summary list of any exemptions granted to the Code by the CER or exceptions utilized, including the exception for Emergency Services; and
- h) two certificates, each in the form attached as Schedule "A" to the Code, attesting to completeness of the Compliance Report and compliance with the Code, one certificate signed by the Senior Vice-President, Canada (Natural Gas division) or similar role with equivalent authority and a second certificate signed by the Compliance Officer.

## **2.0 COMPLIANCE REPORT**

### **2.1 List of Services Agreements**

A list of all Services Agreements in effect at any time during the Reporting Period between the Pipelines and Affiliates is provided in Appendix 1.

### **2.2 Corporate Organization Chart**

Corporate organization charts showing the relationships between TCPL and its Affiliates, including ownership percentages, as of December 31, 2024, are provided in Appendix 2. The organization charts reflect the corporate structure that was in existence at the end of the Reporting Period.

### **2.3 Assessment of Compliance with the Code**

TCPL, as the owner and operator of the Pipelines, is fully committed to the spirit and intent of the Code and believes the Pipelines are operating in compliance with the requirements of the Code. TCPL's Affiliates are also operating in compliance with the requirements of the Code with respect to any interactions with the Pipelines.

#### **Training**

The Pipelines continue to communicate the contents of the Code to its employees and contractors to ensure continued compliance. On an annual basis, the Corporate Compliance Training team administers mandatory online Inter-Affiliate Codes<sup>1,2</sup> Training and Certification to all active employees and contractors. In addition to this annual course assignment, when new or returning employees and contractors are engaged at TC Energy they are required to complete the Inter-Affiliate Codes Training and Certification within 30 days of their start date. Inter-Affiliate Compliance also provides targeted training sessions to certain business units upon request, and Inter-Affiliate Compliance requirements are mentioned in other online courses at TC Energy such as Code of Business Ethics Training.

The Inter-Affiliate Codes Training includes modules that comprise an executive introduction, lessons providing information on the requirements of the Code, and how the Code affects employee and contractor work. After completing the Inter-Affiliate Codes Training, employees and contractors will be able to understand: (i) the Inter-Affiliate Codes, their main objectives, and how to comply with them; (ii) how to comply with TC Energy's processes designed to uphold the Inter-Affiliate Codes; (iii) the process for raising relevant questions or inquiries; and, (iv) how to seek guidance and report a concern. The training also includes sample scenarios and is followed

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<sup>1</sup> TC Energy complies with the following which are collectively known as the Inter-Affiliate Codes: Canadian Code; TCPL Canadian Mainline Bid Floor Personnel (BFP) Information Policy (BFP Policy); U.S. Federal Energy Regulatory Commission Standards of Conduct for Transmission Providers (FERC SOC) the U.S. *Interstate Commerce Act*; and, TC Energía Code of Conduct in Mexico.

<sup>2</sup>As of October 1, 2024 South Bow Corporation (South Bow) and TC Energy's liquids business became a separate unaffiliated legal entity and therefore TC Energy's Inter-Affiliate Compliance program ceased implementing compliance measures for the liquids business.

by a mandatory quiz which must be answered correctly in order to successfully complete the training.

In 2024, Inter-Affiliate Codes Training Certifications (Certifications) were submitted by all active TC Energy employees and contractors who completed Inter-Affiliate Codes Training. Training Certifications are automatically generated following the successful completion of the course and quiz. Certifications are required to be completed by employees and contractors for both the annual deployment of training and ongoing new employee and contractor training. These Certifications also confirm that employees and contractors have received or have access to the current version of the Code, are aware of its contents, agree to abide by its requirements, and that they have abided by the Code in the previous year (as applicable to their role within the organization). Copies of signed or electronic Certifications are maintained by the Corporate Compliance Department on behalf of the Compliance Officer.

### **Internal Controls and Processes**

To accommodate information management and separation of functions, all TC Energy employees and contractors have been assigned an Inter-Affiliate Regulatory Role Classification (IARRC) of either Regulated, Non-Regulated or Shared based on their function within the organization and the requirements of the Code. IARRCs are used in several automated and manual processes to help manage Inter-Affiliate compliance and mitigate the risk of Non-Regulated employees or contractors having access to Confidential Information and Pipeline Information (collectively, Regulated Information).

Further to IARRC, some TC Energy information assets (e.g., SharePoint sites, MS Teams, applications, and Power Apps Solutions; collectively referred to as “Digital Assets”) complete an assessment upon creation or onboarding of the Digital Asset into TC Energy’s environment. The results of this assessment are used to determine the Digital Asset’s regulatory classification (i.e., Regulated or Non-Regulated) based on the type of information contained within them or that they will provide access to, which assists with confirming that only compliant access is provided to employees and contractors.

TC Energy currently uses the following asset management processes to deliver both preventive and detective controls to manage employee and contractor access to physical and virtual entitlements based on their IAARC: (i) Microsoft Office 365 Registry; (ii) Microsoft Office 365 Audit; (iii) SailPoint Identify IQ (SailPoint); (iv) SAP; and, (v) IS ServiceNow with respect to Power Apps Solutions.

#### **Microsoft Office 365 Registry (O365 Registry)**

- The O365 Registry lists all SharePoint sites and MS Teams with their respective regulatory classification (i.e., Regulated or Non-Regulated) and also provides a source of records for SharePoint sites and MS Teams (e.g., site purpose, ownership, links to site).

#### **Microsoft Office 365 Audit**

- An audit script for some MS O365 applications (i.e., SharePoint sites, MS Teams, Power Bi, Power Apps) is run regularly which automatically removes or flags for manual removal

Non-Regulated employees and contractors who are found as having potential inadvertent access to Regulated SharePoint sites, MS Teams, Power Bi or Power Apps.

### **SailPoint**

- SailPoint is used to manage identities, accounts and access for all employees and contractors with respect to automated requesting, approval, and provisioning of selected enterprise applications and infrastructure assets. Inter-Affiliate Compliance is notified of potential compliance issues via Access Requests generated from SailPoint. An Access Request is triggered when a potential conflict between an individual's IARRC and an asset's regulatory classification is detected. Inter-Affiliate Compliance then reviews the notification to confirm the Access Request is compliant.
- Inter-Affiliate Compliance also receives and reviews Compliance Transfer Certifications (CTC) which are triggered whenever employees or contractors within the organization change IARRC (e.g., Shared to Regulated) due to either a role change or a re-classification event, and Inter-Affiliate Compliance is required to review and either revoke or approve the decisions made by the leader to ensure access is appropriate for their new/current IARRC.
- A Compliance Certification audit within SailPoint is an automated quarterly review of all enterprise applications that is managed by the Cybersecurity Office. Each Digital Asset Owner (DAO) or Digital Asset Owner Delegate (DAOD) is sent a current list of users of their application to review and attest that all user access is appropriate and up to date, and any potential discrepancies are brought to the attention of Inter-Affiliate Compliance for further handling to confirm compliance.
- SailPoint also manages most of TC Energy's Restricted floor/area access which requires Inter-Affiliate Compliance to review and approve access. Inter-Affiliate Compliance conducts quarterly and annual assessments using the reporting functionality within SailPoint for Restricted floors and areas to confirm Non-Regulated employees and contractors do not have access.

### **Systems, Application and Products (SAP)**

- Through the use of SAP infrastructure, all corporate entities that have been onboarded into SAP must be classified as either Regulated or Non-Regulated. Inter-Affiliate Compliance is consulted when new entities are being onboarded to validate the correct classification has been assigned. Based on an individual's IARRC, systematic controls assign the correct SAP information access permissions that a role is permitted to access (e.g., Non-Regulated employees and contractors cannot access Regulated Information).
- Within SAP there are also specific roles that get assigned or are requested by users to meet a specific role requirement. These roles are classified as Regulated, Non-Regulated or Shared, and Inter-Affiliate Compliance conducts a quarterly review to confirm access is in compliance.

### **Power Apps Solutions (Compliance Certification Process)**

- A Compliance Certification process is used for Power App Solutions to support compliant automation technology used at TC Energy. The Compliance Certification process requires all Solutions built in a Non-Production or test environment to complete a form capturing

details about the Power App Solution and answering questions to certify that the Power App Solution is following compliance standards before the Power App Solution can be moved to a live or “Production” environment. The Compliance Certification requires the developer to attest to the type of information contained in the Power App Solution and certify that they will satisfy all compliance requirements as described in the certification form which include Inter-Affiliate Compliance requirements. This certification aids in identifying the types of information it will contain and classifies the Power App Solution as Regulated or Non-Regulated.

- All completed certifications for Power App Solutions are recorded and auditable.
- All Power App Solutions that complete the Compliance Certification Form (and other IS requirements as necessary) and are moved into a Production environment, are included in the abovementioned quarterly Compliance Certification audit within SailPoint.
- A notification is generated for any unattended Power App Solution whose Digital Asset Manager (DAM) has left TC Energy. This notification requires the DAO to reassign, take ownership of or delete the Power App Solution, ensuring each Power App Solution always has an active manager.

## **2.4 Assessment of Compliance Plan Effectiveness**

The Plan describes the measures, procedures and monitoring mechanisms that the Pipelines employ to ensure full compliance with the provisions of the Code. The Code also contains measures to ensure that the Pipeline’s Affiliates comply with all aspects of the Code when interacting with the Pipelines.

The Compliance Plan has been effective in achieving the objectives of the Code, namely by:

- providing transparent and consistent guidance respecting Affiliate activities and transactions;
- setting standards that result in Affiliates and customers being treated fairly and consistently, preventing cross-subsidization, and preventing preferential treatment;
- protecting and setting standards for the use of customer Confidential Information collected in the course of providing services and access to facilities; and
- avoiding anti-competitive practices between the Pipelines and their Affiliates, which may be detrimental to the interests of the Pipelines' customers.

As demonstrated in the reporting provided below in sections 2.5 and 2.6, the Pipelines complied with the Code and continue to adhere to the requirements set out by the Code and Plan. Directors, officers, employees, contractors and Affiliates have access to the Code and Plan via TC Energy’s internal and/or external websites and, as described in section 2.3 of this Report, the Code and Plan is also provided to all employees and contractors during the mandatory Inter-Affiliate Codes Training that must be completed within 30 days of their start date and annually thereafter. Through training and available resources, employees and contractors are therefore aware of the requirement to adhere to the Code and if needed can contact Inter-Affiliate Compliance for guidance.

## **2.5 Comprehensive Description of any Material Non-Compliance with the Code**

The Pipelines are not aware of any circumstances involving a material non-compliance with the Code requirements during the Reporting Period.

## **2.6 Summary of Disputes, Complaints and Inquiry Activity**

The Pipelines did not receive any complaints, inquiries, or disputes during the Reporting Period. The Pipelines have encouraged parties to seek additional information or clarification of Code provisions and responsibilities if they had any questions or concerns. The only inquiries received by the Pipelines were routine informal inquiries from stakeholders seeking guidance of an educational nature. These interactions did not in any way constitute disputes or complaints.

## **2.7 Summary List of Any Exemptions to the Code including Emergency Services.**

No exemptions to the Code were requested by or granted to the Pipelines during the Reporting Period.

One Emergency Service was provided by a Pipeline to a Regulated Affiliate on a cost recovery basis due to a gas turbine failure for a period of twelve weeks.

## **2.8 Officer's Certificates**

Two Officer's Certificates, one signed by the Compliance Officer and one signed by the President, Canadian Natural Gas Pipelines for the Reporting Period are provided in Appendix 3. These officers attest to the completeness of the Compliance Report and the Pipeline's compliance with the Code over the Reporting Period.

## **3.0 CONCLUSION**

The Pipelines believe they have complied with and operated in accordance with the provisions, spirit and intent of the Code for the Reporting Period. The Pipelines will post this Compliance Report on the internet and notify interested parties of its availability.

**APPENDIX 1**  
**LIST OF SERVICE AGREEMENTS**

**Canadian Gas Pipelines  
Code of Conduct  
2024 Compliance Report**



**Canadian Gas Pipelines  
Code of Conduct  
2024 Compliance Report**

**LIST OF AFFILIATE SERVICE AGREEMENTS**

<b>Pipeline</b>	<b>Affiliate</b>	<b>Agreement</b>
Foothills Pipe Lines Ltd.	TransCanada Calibrations Ltd.	System Maintenance Agreement
Foothills Pipe Lines Ltd.	TransCanada Turbines Ltd.	Service Agreement
Foothills Pipe Lines Ltd.	TC Energy Marketing Inc.	Interruptible Transportation Service Agreement
Foothills Pipe Lines Ltd.	TransCanada Energy Ltd.	Interruptible Transportation Service Agreement
Great Lakes Pipeline Canada Ltd.	TransCanada Energy Ltd.	Interruptible Transportation Service Agreement
Great Lakes Pipeline Canada Ltd.	TransCanada PipeLines Limited	Operating Agreement
Great Lakes Pipeline Canada Ltd.	TransCanada PipeLines Limited	Transportation Service Agreement
NOVA Gas Transmission Ltd.	TransCanada Energy Ltd.	Delivery Transportation Service Agreement
NOVA Gas Transmission Ltd.	TransCanada Energy Ltd.	Lease Agreements
NOVA Gas Transmission Ltd.	CrossAlta Gas Storage & Services Ltd.	Facility Connection Service Agreement
NOVA Gas Transmission Ltd.	CrossAlta Gas Storage & Services Ltd.	Delivery Service Contract
NOVA Gas Transmission Ltd.	Foothills Pipe Lines Ltd.	Operational Balancing Agreement
NOVA Gas Transmission Ltd.	TransCanada Calibrations Ltd.	System Maintenance Agreement
NOVA Gas Transmission Ltd.	TransCanada Energy Ltd. (1)	Transportation Service Agreement
NOVA Gas Transmission Ltd.	TransCanada Gas Storage Partnership	Transportation Service Agreements
NOVA Gas Transmission Ltd.	TransCanada Keystone Pipeline Limited Partnership (2)	Lease Agreements
NOVA Gas Transmission Ltd.	TransCanada Turbines Ltd.	Service Agreement Maintenance Support
NOVA Gas Transmission Ltd.	TransCanada Pipeline Ventures Limited Partnership	Transportation Services Agreement
NOVA Gas Transmission Ltd.	TransCanada Pipeline Ventures Limited Partnership	Inter-Corporate Services Agreement
NOVA Gas Transmission Ltd.	TransCanada PipeLines Limited	Operating Agreement
NOVA Gas Transmission Ltd.	TransCanada PipeLines Limited	Gas Balancing Agreement
NOVA Gas Transmission Ltd.	Coastal GasLink Pipeline Ltd.	Lease Agreement
NOVA Gas Transmission Ltd.	Coastal GasLink Pipeline Ltd.	Interconnecting/Operating Agreement
TransCanada Pipelines Limited Canadian Mainline	Great Lakes Gas Transmission Company	Transportation Service Agreement
TransCanada Pipelines Limited Canadian Mainline	Great Lakes Pipeline Canada Ltd.	Transportation Service Agreement
TransCanada Pipelines Limited Canadian Mainline	NOVA Gas Transmission Ltd.	Master Service Agreement/Operating Agreement
TransCanada Pipelines Limited Canadian Mainline	NOVA Gas Transmission Ltd.	Gas Balancing Agreement
TransCanada Pipelines Limited Canadian Mainline	NOVA Gas Transmission Ltd.	Lease Agreement
TransCanada Pipelines Limited Canadian Mainline	Foothills PipeLines (South B.C.) Ltd.	Operating Agreement
TransCanada Pipelines Limited Canadian Mainline	Foothills PipeLines (Sask) Ltd.	Operating Agreement
TransCanada Pipelines Limited Canadian Mainline	Foothills PipeLines (Alta) Ltd.	Operating Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Calibrations Ltd.	Lease Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Calibrations Ltd.	Gas Stream Use Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Energy Ltd.	Electrical Service Agreements
TransCanada Pipelines Limited Canadian Mainline	TransCanada Energy Ltd.	Parking and Loan Service Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Energy Ltd.	Agency Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Limited Energy Ltd.	Gas Transportation Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Gas Storage Partnership	Gas Storage Services Contract
TransCanada Pipelines Limited Canadian Mainline	TransCanada Keystone Pipeline Limited Partnership	Lease Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Turbines Ltd.	Master Supply Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Turbines Ltd.	Service Agreement
TransCanada Pipelines Limited Canadian Mainline	Trans Québec & Maritimes Pipeline Inc.	Letter of Commitment for pre-work
TransCanada Pipelines Limited Canadian Mainline	Trans Québec & Maritimes Pipeline Inc.	Transportation Service Agreements
TransCanada Pipelines Limited Canadian Mainline	TransCanada Power Marketing Ltd.	Parking and Loan Service
TransCanada Pipelines Limited Canadian Mainline	TransCanada Power Marketing Ltd.	Interruptible Transportation Service Agreement
TransCanada Pipelines Limited Canadian Mainline	Portland Natural Gas Transmission System	Interruptible Transportation Service Agreement
TransCanada Pipelines Limited Canadian Mainline	Portland Natural Gas Transmission System	Parking and Loan Service
TransCanada Pipelines Limited Canadian Mainline	Saddlebrook Solar & Storage GP Ltd.	Renewable Electricity Purchase Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Energy Ltd.	Gas Transaction Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Energy Ltd.	Master Credit Sales Agreement
TransCanada Pipelines Limited Canadian Mainline	TransCanada Energy Ltd.	Virtual Wind Energy Purchase Agreement

Note : (1) Includes transactions with TransCanada Power, a division of TransCanada Energy Ltd

Further note: (2) Effective October 1, 2024 this entity legally separated from TC Energy Corporation through the spinoff of the Liquids Pipelines business and is therefore no longer an affiliated entity.

**APPENDIX 2**  
**CORPORATE ORGANIZATION CHART**

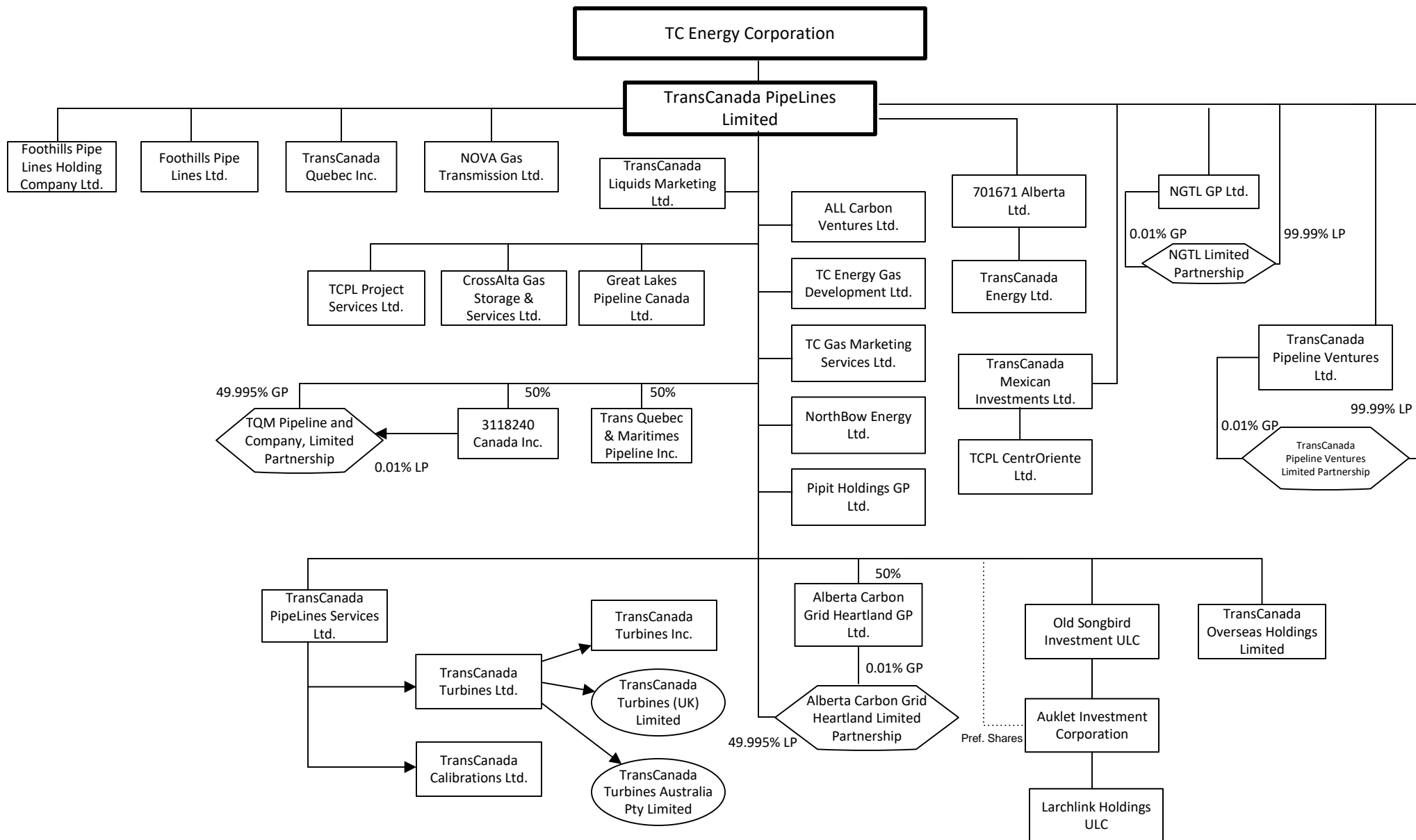
**Canadian Gas Pipelines**  
**Code of Conduct**  
**2024 Compliance Report**

Chart 1

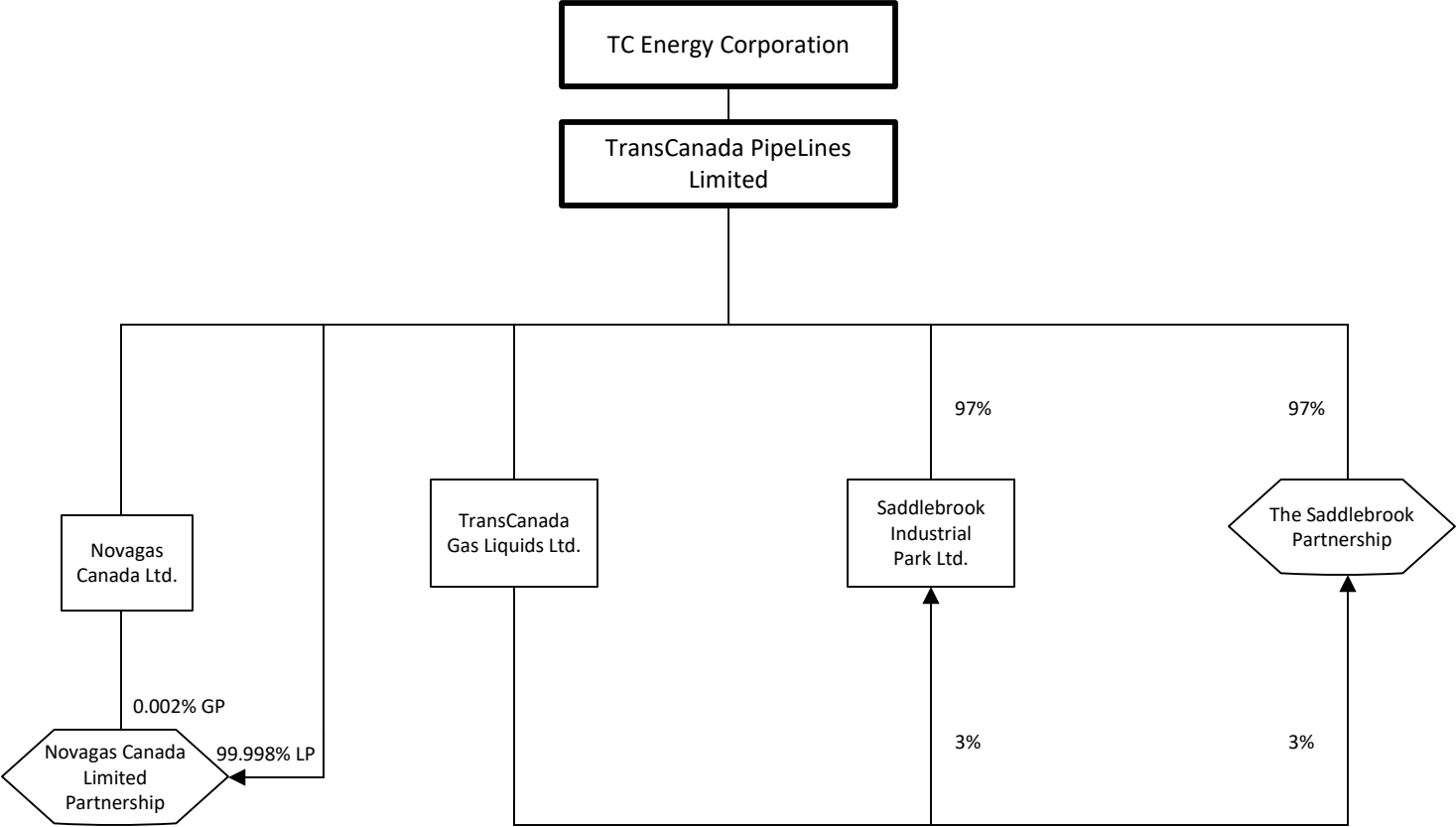
# Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited

## Canadian Active Subsidiaries & Affiliates

100% owned unless otherwise indicated

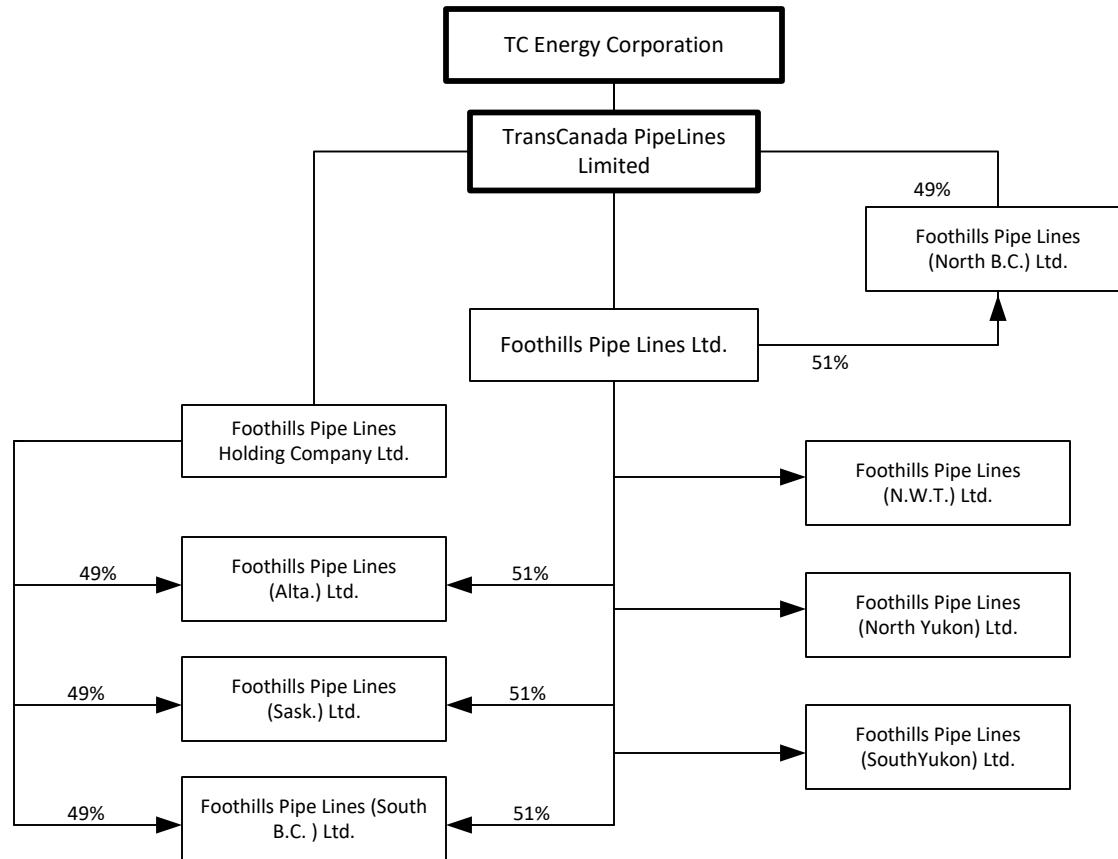


Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
Canadian Midstream Active Subsidiaries & Affiliates  
100% owned unless otherwise indicated

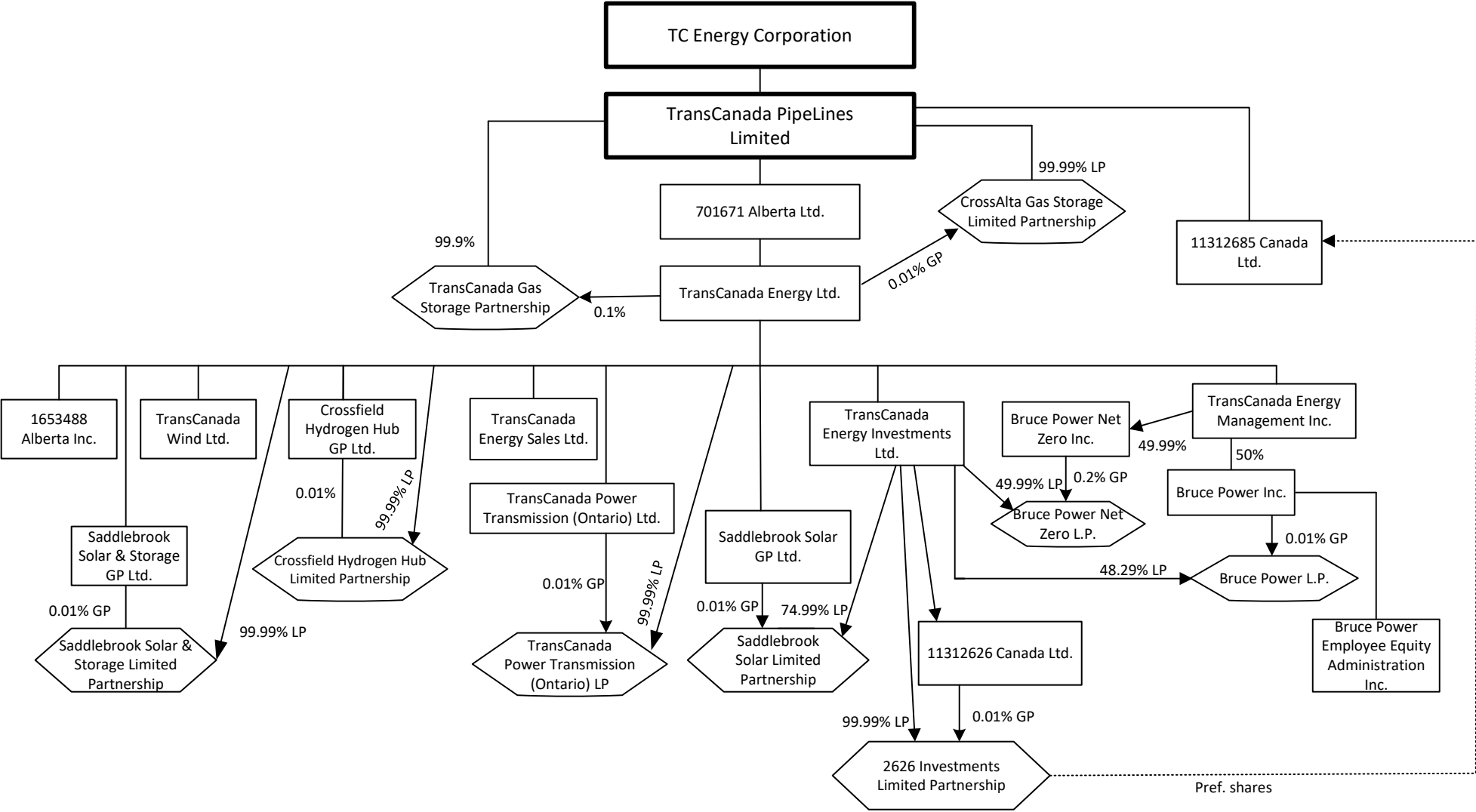


Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
Active Subsidiaries & Affiliates of Foothills Pipe Lines Ltd.

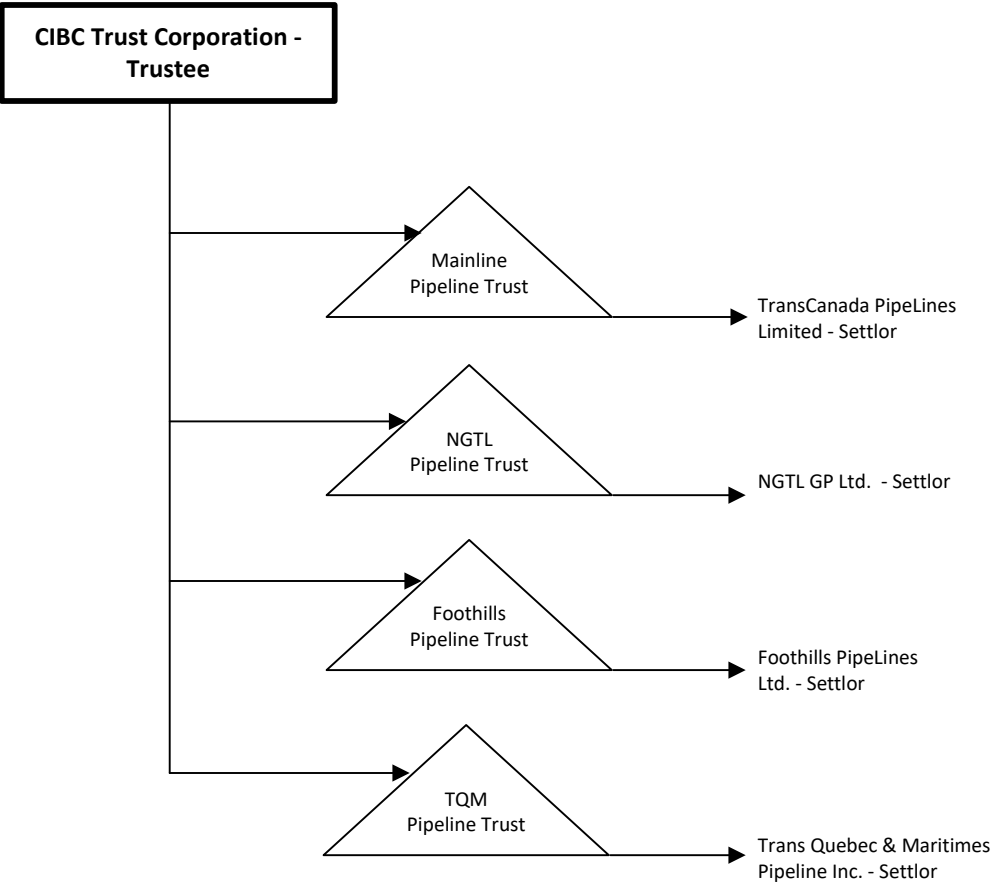
100% owned unless otherwise indicated



Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
as it relates to TransCanada Energy Ltd.  
Active Subsidiaries & Affiliates  
100% owned unless otherwise indicated

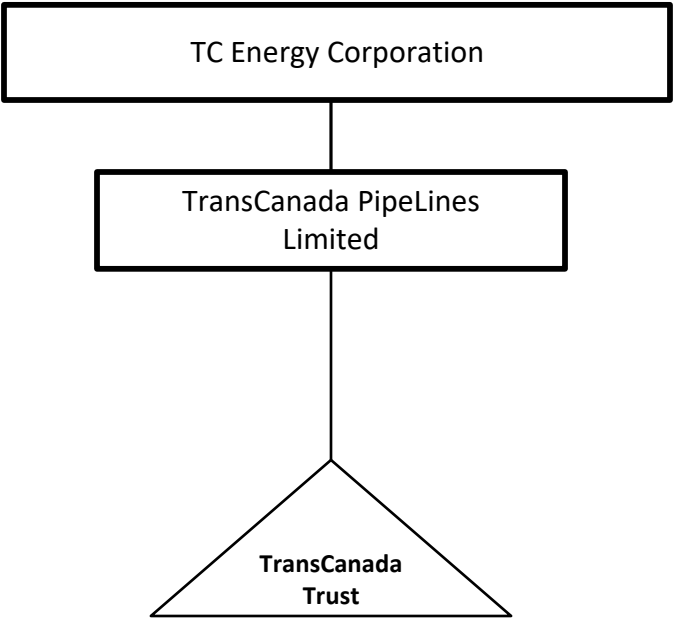


Organizational Chart of Canadian Pipeline Trusts  
[all governed by the laws of Alberta]



Trusts formed for pipe abandonment costs (as mandated by the Canada Energy Regulator (CER)).

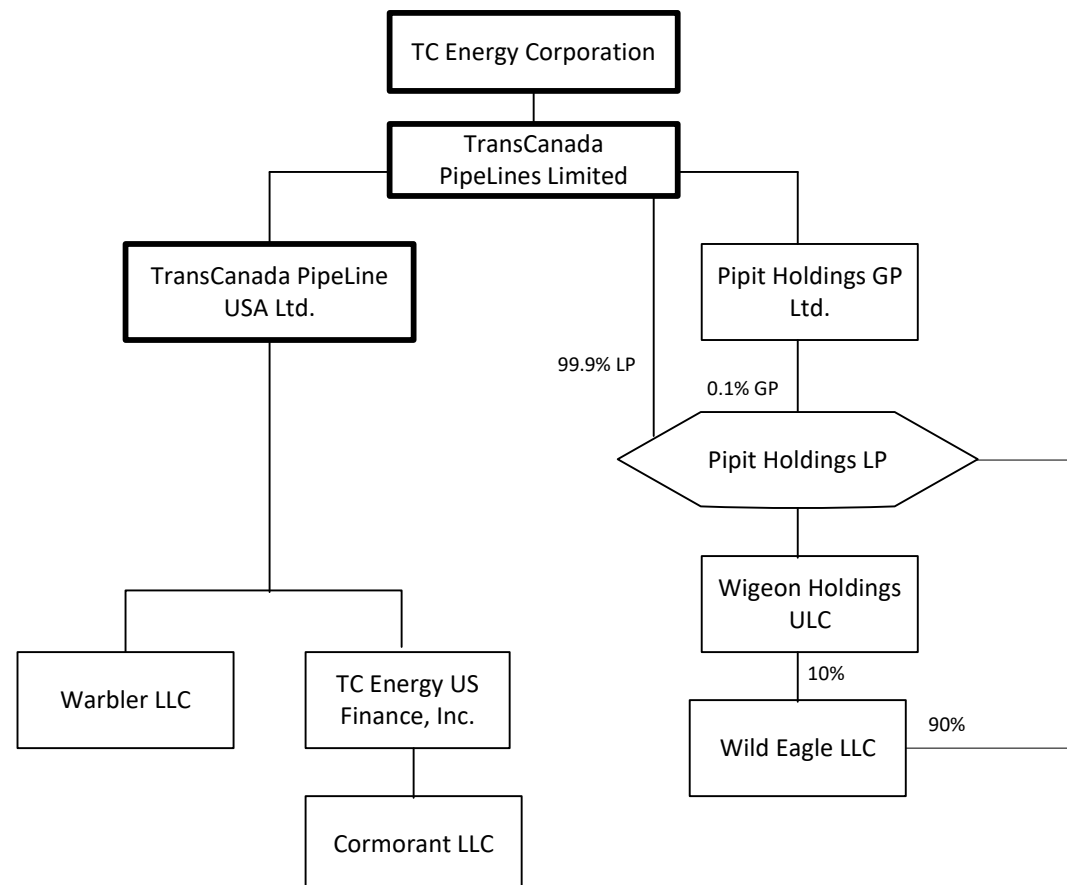
Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
Canadian Active Subsidiaries & Affiliates as it relates to  
Canadian Financing.  
100% owned unless otherwise indicated





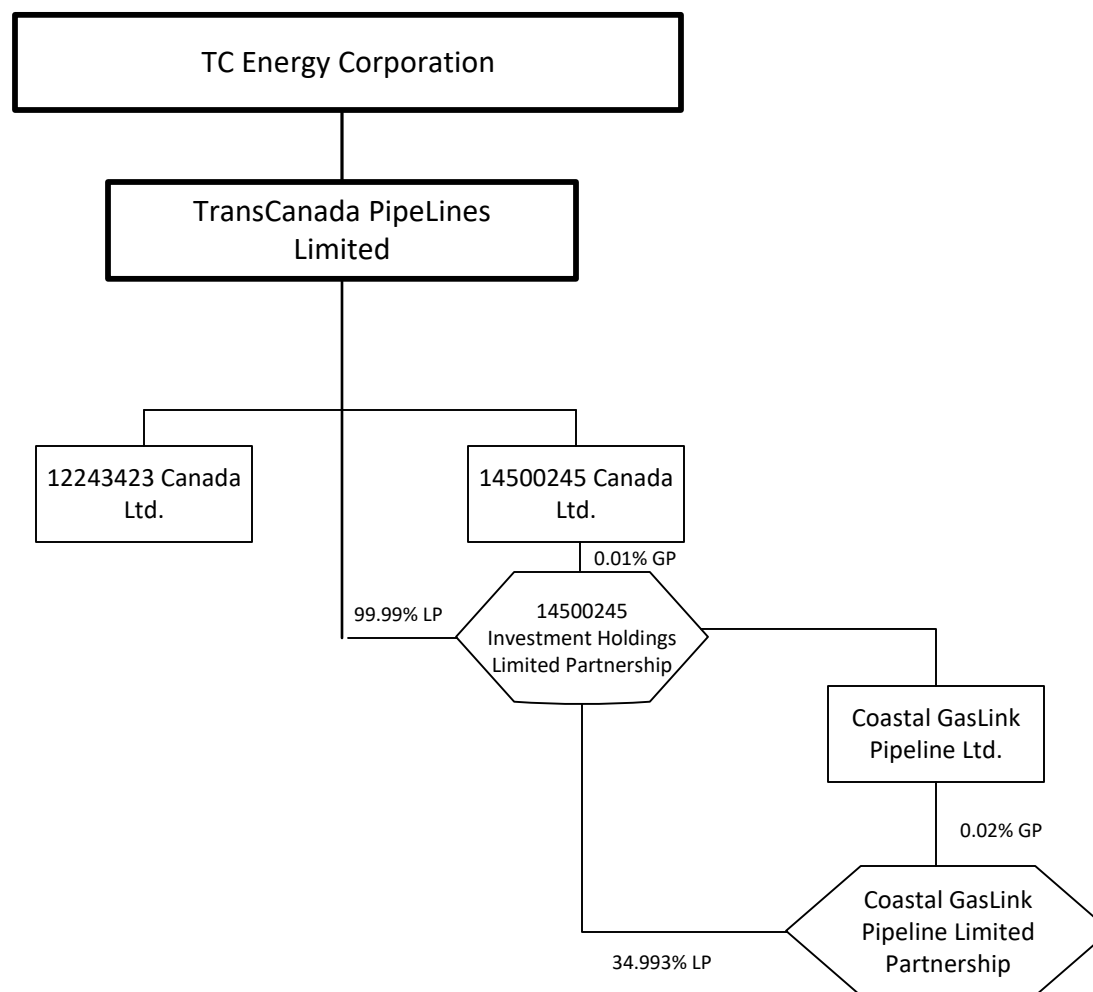
Organizational Chart of TC Energy Corporation, TransCanada PipeLines Limited and  
TransCanada PipeLine USA Ltd.  
Canada/United States Active Subsidiaries & Affiliates

100% owned unless otherwise indicated

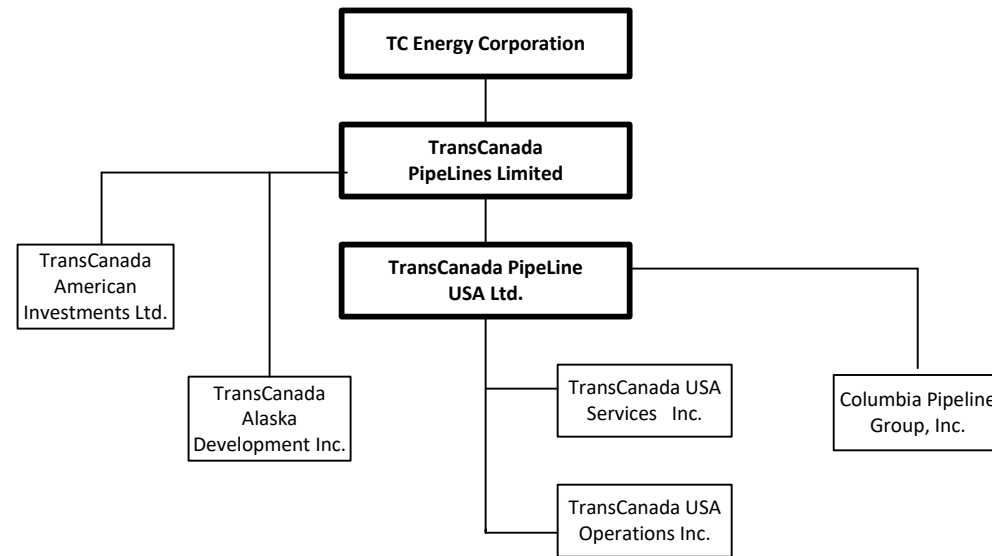


Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
Canadian Active Subsidiaries & Affiliates as it relates to  
Coastal GasLink Pipeline

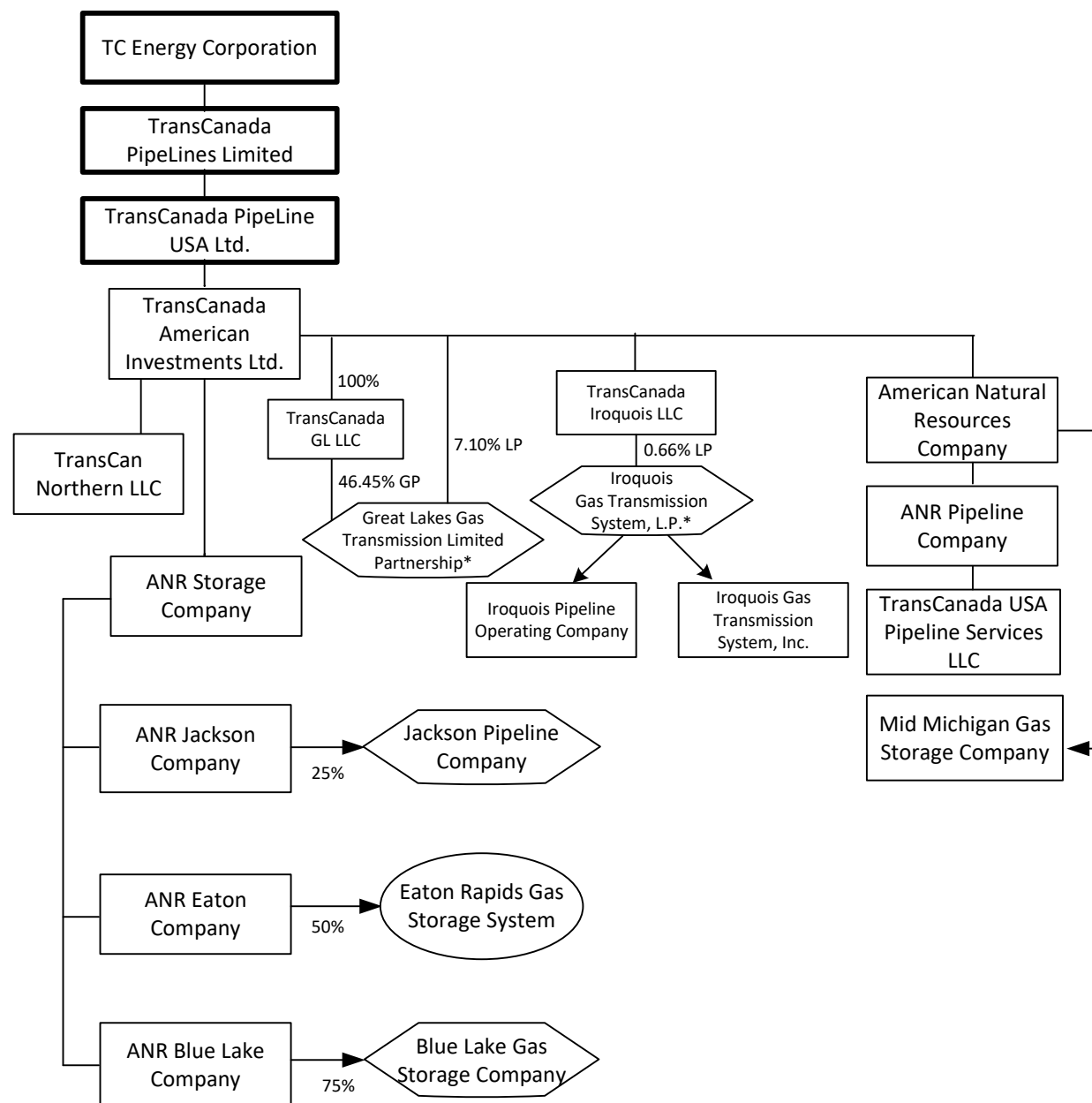
100% owned unless otherwise indicated



Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
United States Active Pipeline Subsidiaries & Affiliates  
(TransCanada PipeLine USA Ltd.)  
100% owned unless otherwise indicated



Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
United States Active Subsidiaries & Affiliates  
(as it relates to TransCanada American Investments Ltd.)  
100% owned unless otherwise indicated



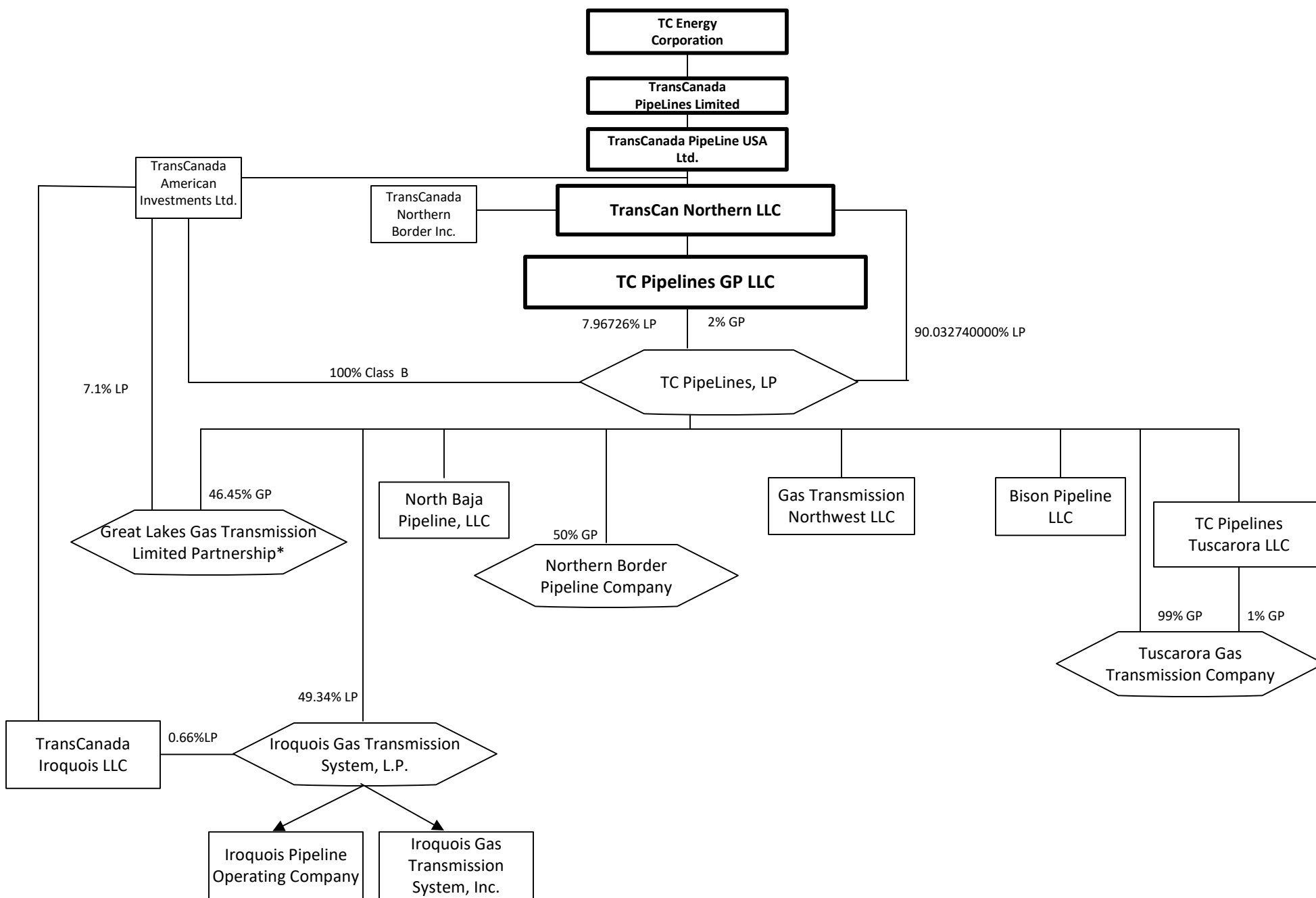
December 31, 2024

\*TC Pipelines, LP holds a 49.34% LP interest in Iroquois Gas Transmission System, L.P and a 46.45% GP interest in Great Lakes Gas Transmission Limited Partnership (see chart 2B)

# Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited

## Active Subsidiaries & Affiliates of TransCan Northern LLC and TC PipeLines, LP

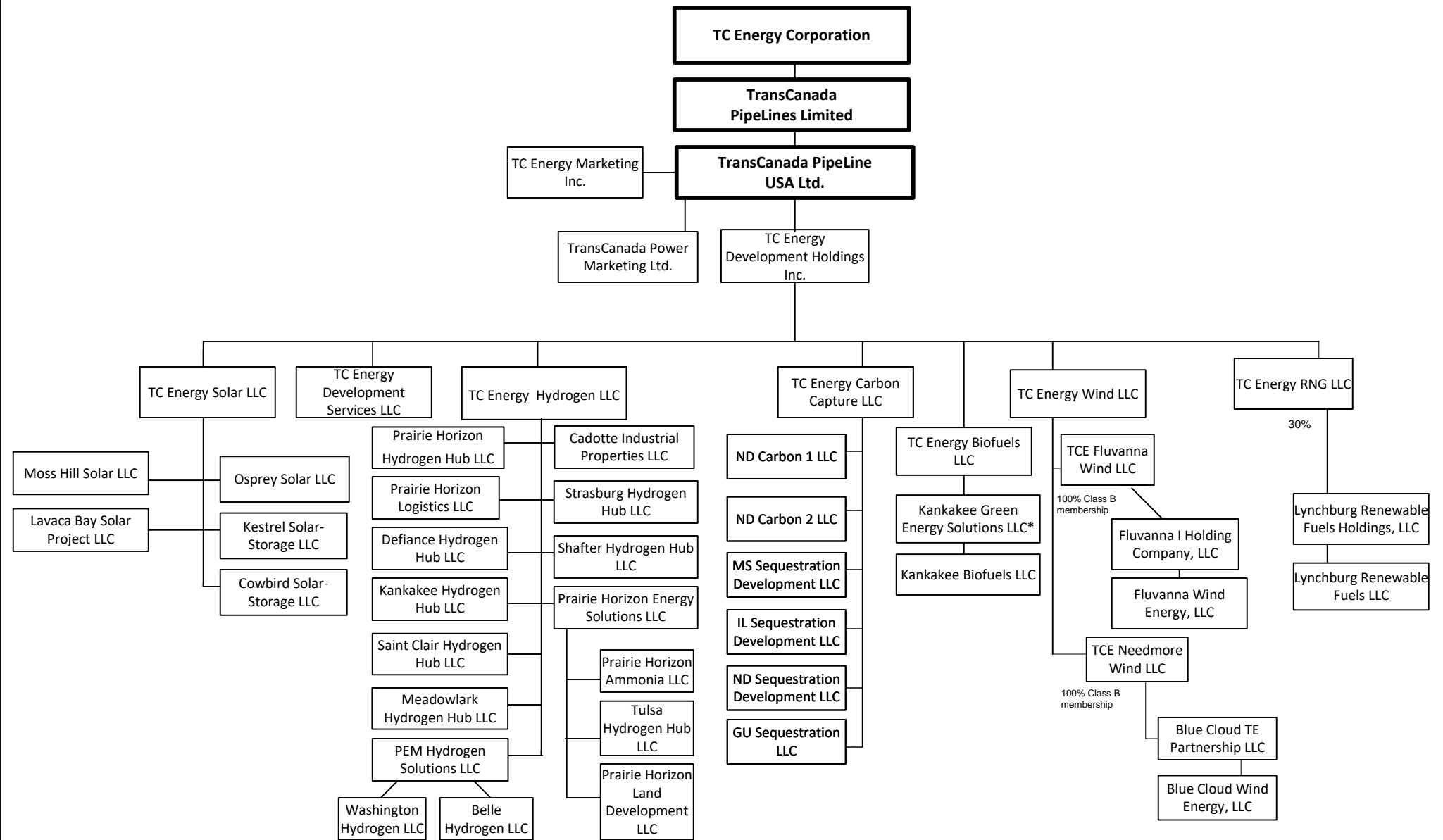
100% owned unless otherwise indicated



December 31 , 2024

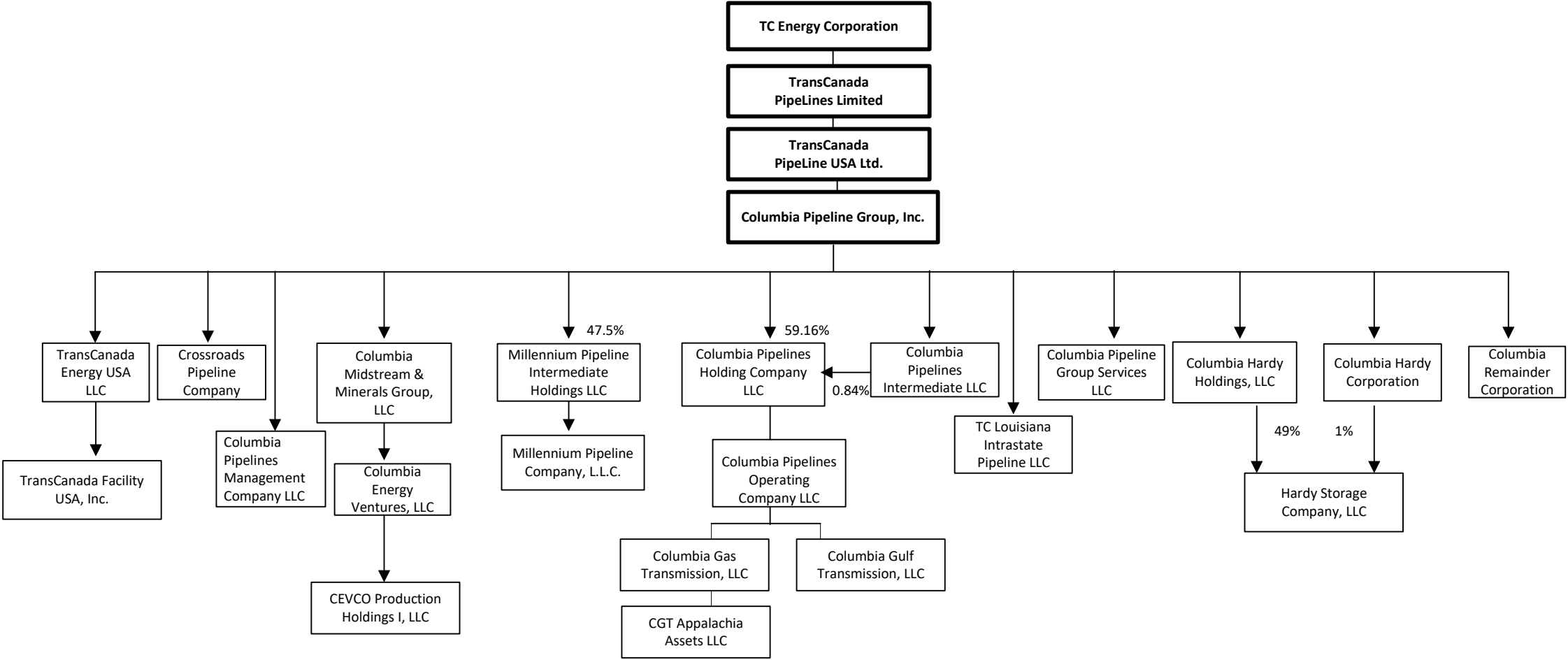
\*The remaining 46.45% GP interest in the Great Lakes Gas Transmission Limited Partnership is held by: TransCanada GL LLC (see chart 2a)

**Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited**  
**United States Active Energy Subsidiaries & Affiliates**  
**(TransCanada PipeLine USA Ltd.)**  
 100% owned unless otherwise indicated



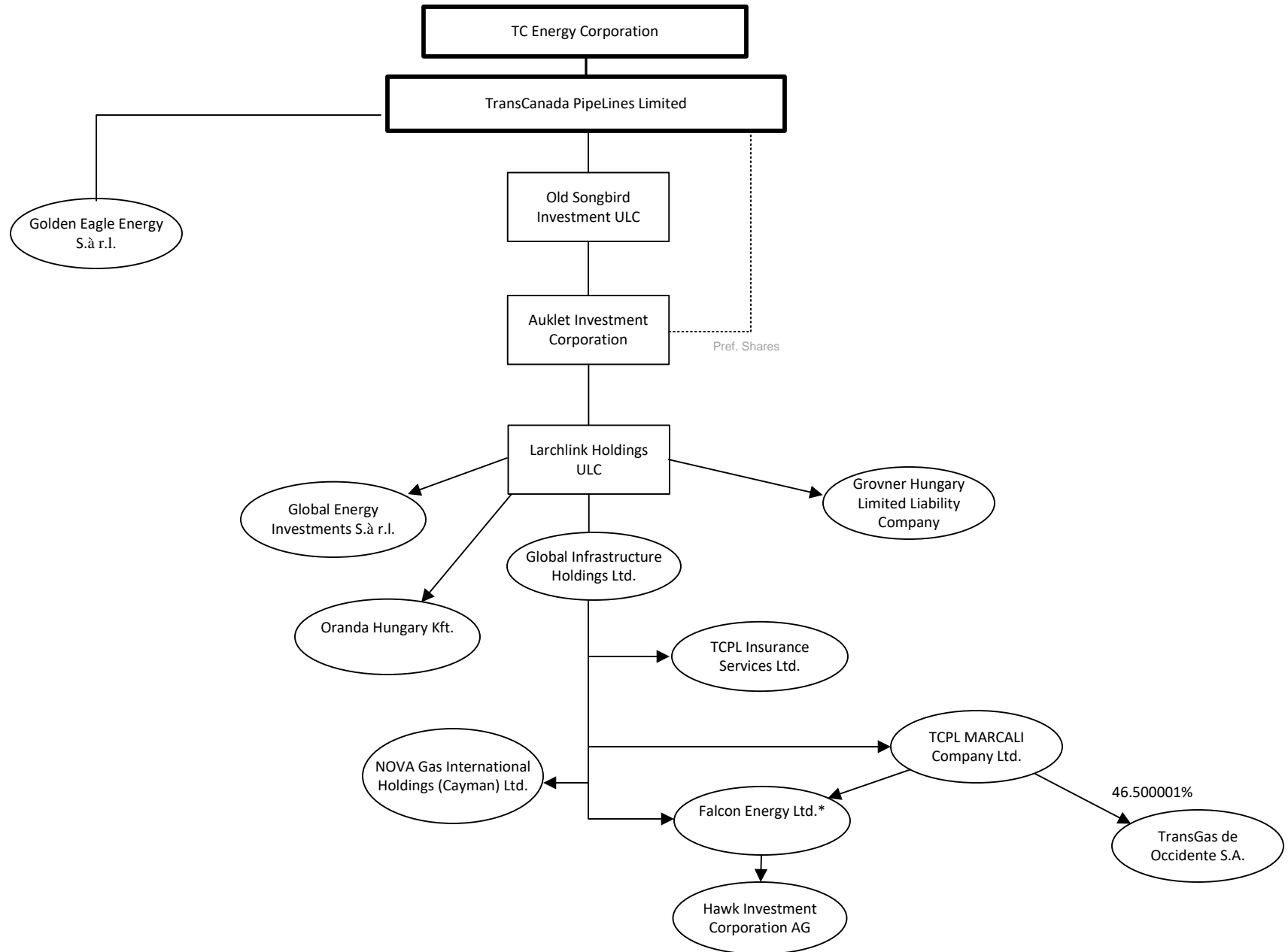
Corporate Organizational Chart of TransCanada PipeLines Limited as it pertains to the  
Columbia Pipeline Group  
100% owned unless otherwise indicated

Chart 2D



# Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited Certain International Active Subsidiaries & Affiliates

100% owned unless otherwise indicated

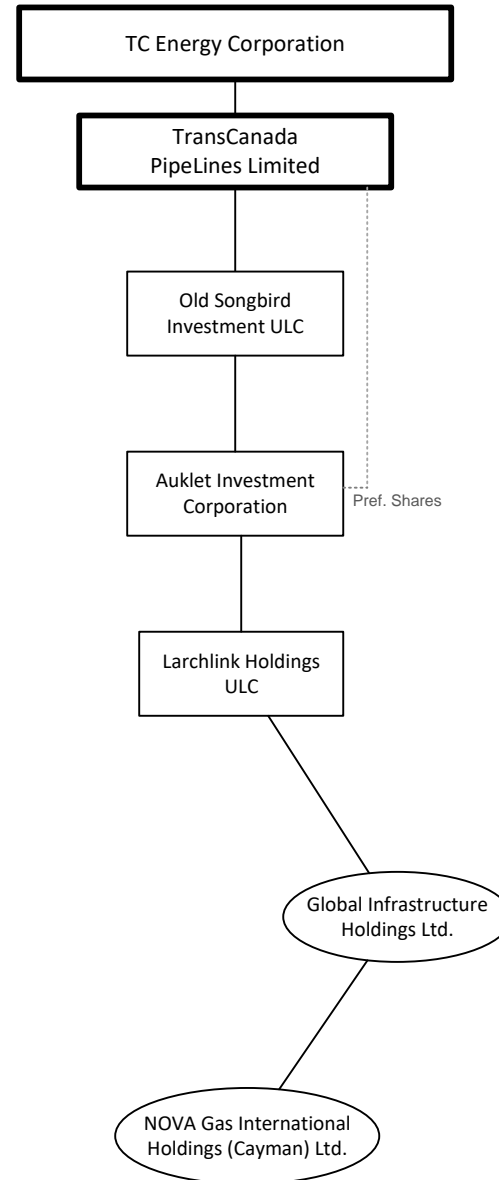


\*Global Infrastructure Holdings Ltd. holds 100% voting interest of Falcon Energy Ltd.



Chart 3A

Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
International Related Active Subsidiaries & Affiliates  
100% owned unless otherwise indicated



Organizational Chart of TC Energy Corporation and  
TransCanada PipeLines Limited  
Mexican Active Subsidiaries and Affiliates of  
TransCanada Mexican Investments Ltd.  
100% owned unless otherwise indicated

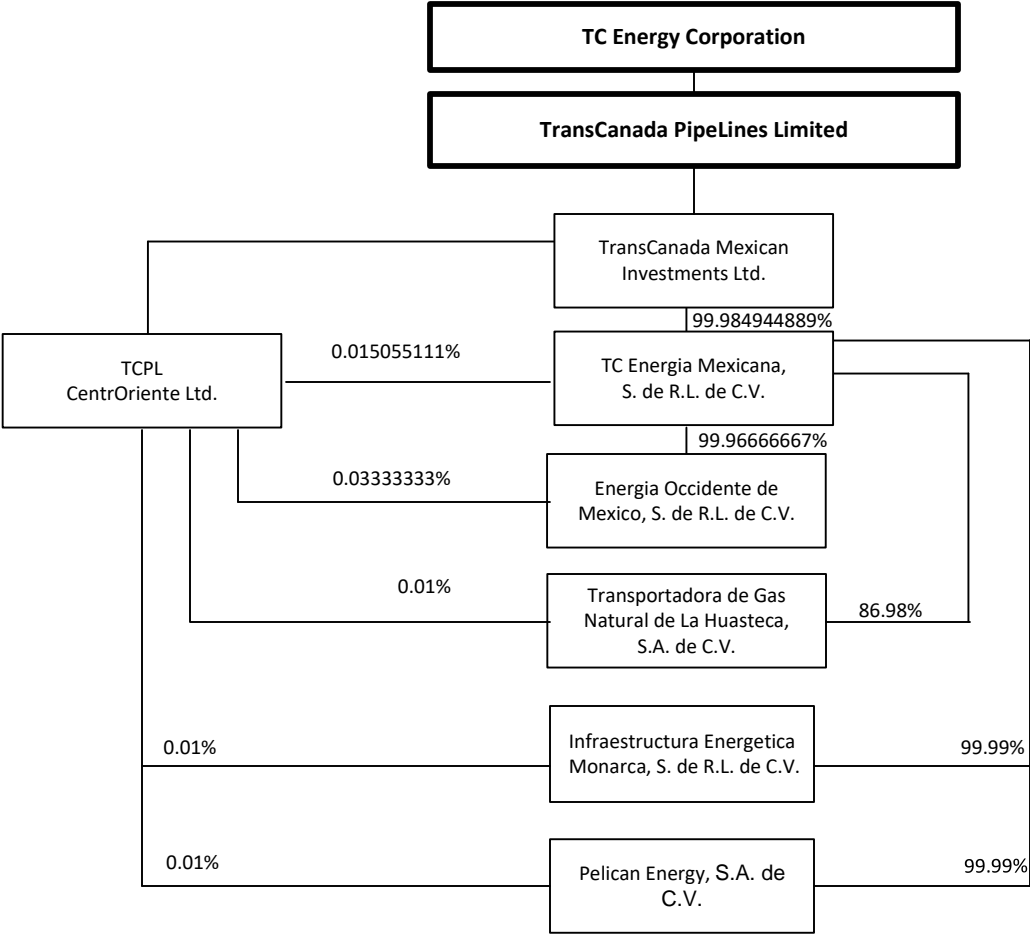
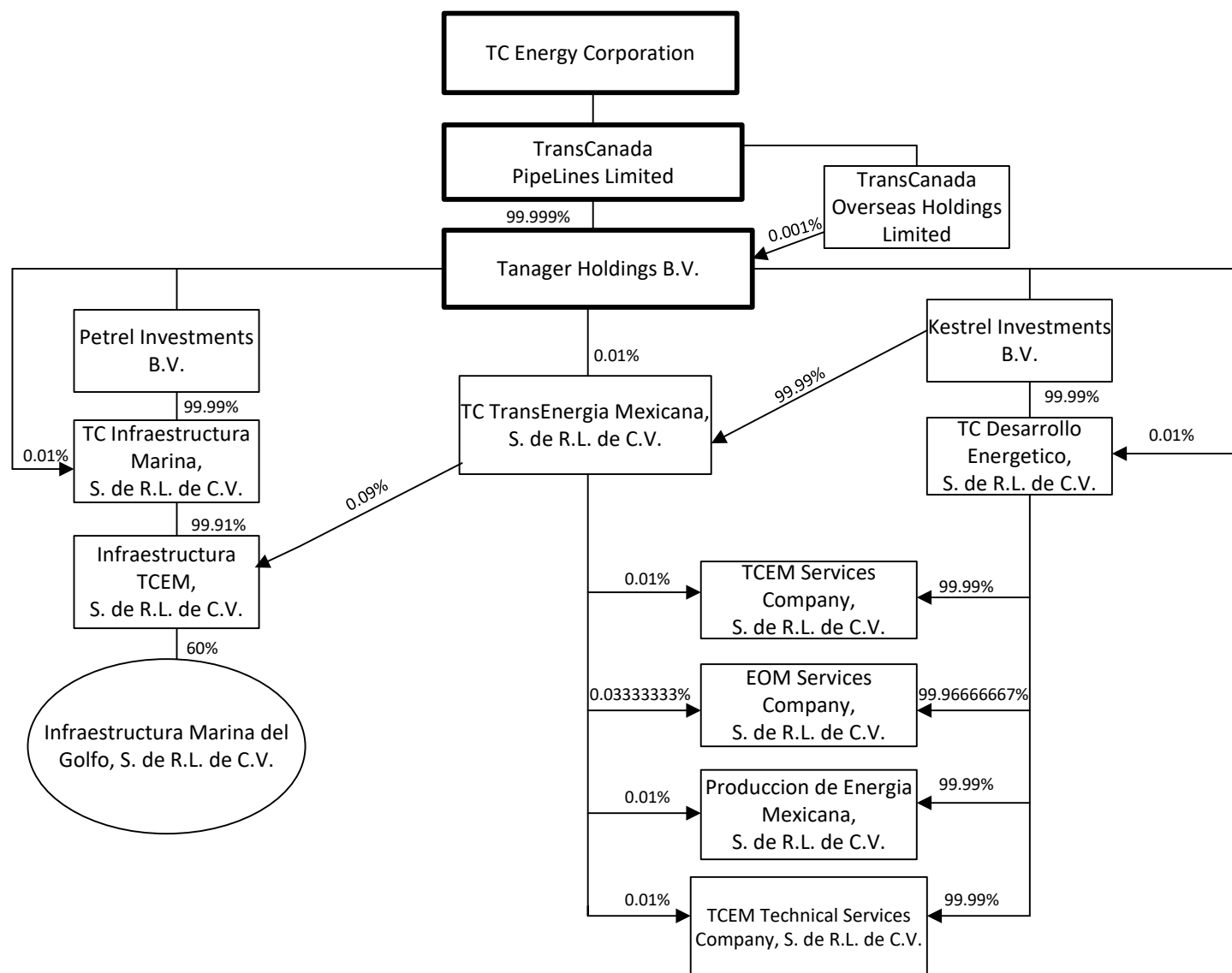


Chart 4A

Organizational Chart of TC Energy Corporation and TransCanada PipeLines Limited  
Dutch and Mexican Active Subsidiaries & Affiliates of Tanager Holdings Cooperatief U.A.  
100% owned unless otherwise indicated



**APPENDIX 3**  
**OFFICIERS CERTIFICATES**

**Canadian Gas Pipelines**  
**Code of Conduct**  
**2024 Compliance Report**

## CANADIAN GAS PIPELINES CODE OF CONDUCT (CODE)

### SCHEDULE A – OFFICERS CERTIFICATE

To: The Canada Energy Regulator

I, Rosemary Stevens of the City of Calgary, in the Province of Alberta, acting in my position as Compliance Officer and not in my personal capacity, to the best of my knowledge do hereby certify as follows:

1. My position with the Pipelines is Compliance Officer, and as such I have personal knowledge of, or have conducted due inquiry of individuals who have personal knowledge of, the facts and matters herein stated.
2. Capitalized terms used herein (which are not otherwise defined herein) shall have the meanings ascribed thereto in the Canadian Gas Pipelines Code of Conduct (the Code).
3. I have read the Code and the Compliance Report of Canadian Gas Pipelines for the January 1, 2024 to December 31, 2024 reporting period (the Compliance Report).
4. The form and contents of the Compliance Report comply with the requirements of the Code and the matters reported therein are fully and accurately described.
5. I am not aware of any material non-compliance with the provisions of the Code by any director, officer, employee, consultant, contractor or agent of the Pipelines, as applicable, or by any Affiliate of the Pipelines (including any director, officer, employee, consultant, contractor or agent of the Affiliate) with respect to any interaction between an Affiliate and the Pipelines that is not fully and accurately described in the Compliance Report.

Signature: Original signed by Rosemary Stevens

Title: Compliance Officer

Date: April 15, 2025

## CANADIAN GAS PIPELINES CODE OF CONDUCT (CODE)

### SCHEDULE A – OFFICERS CERTIFICATE

To: The Canada Energy Regulator

I, Trevor Ebl of the City of Calgary, in the Province of Alberta, acting in my position as President, Canadian Natural Gas Pipelines and not in my personal capacity, to the best of my knowledge do hereby certify as follows:

1. My position with the Pipelines is President, Canadian Natural Gas Pipelines, and as such I have personal knowledge of, or have conducted due inquiry of individuals who have personal knowledge of, the facts and matters herein stated.
2. Capitalized terms used herein (which are not otherwise defined herein) shall have the meanings ascribed thereto in the Canadian Gas Pipelines Code of Conduct (the Code).
3. I have read the Code and the Compliance Report of Canadian Gas Pipelines for the January 1, 2024 to December 31, 2024 reporting period (the Compliance Report).
4. The form and contents of the Compliance Report comply with the requirements of the Code and the matters reported therein are fully and accurately described.
5. I am not aware of any material non-compliance with the provisions of the Code by any director, officer, employee, consultant, contractor or agent of the Pipelines, as applicable, or by any Affiliate of the Pipelines (including any director, officer, employee, consultant, contractor or agent of the Affiliate) with respect to any interaction between an Affiliate and the Pipelines that is not fully and accurately described in the Compliance Report.

Signature: Original signed by Trevor Ebl

Title: President, Canadian Natural Gas  
Pipelines

Date: April 15, 2025