



COMMUNICATIONS POLICY

PURPOSE AND SCOPE

The purpose of this Policy is to outline expectations regarding internal and external communications, including Personnel's personal use of Social Media to the extent that Personnel may refer to TransCanada or be perceived to be speaking on behalf of the Company.

This Policy applies to all TransCanada Personnel.

DEFINITIONS

Brand means the visual identity, including images, tone, colours, and fonts that TransCanada uses for all internal and external communications and marketing materials as outlined in the [TransCanada Corporate Brand Standards Manual](#).

Company Content means materials including, but not limited to, graphs, quotations from print and other visual material and Company information.

ELT means TransCanada's Executive Leadership Team.

Inappropriate Content means any offensive, defamatory, illegal, or similarly inappropriate content.

Good Faith Reporting means an open, honest, fair and reasonable report without malice or ulterior motive.

Media means any party in traditional (radio/television/print) and digital media, including Social Media.

Personnel means full-time, temporary and part-time employees and contractors.

Public Events means events including conferences, trade shows, recruiting functions, panel discussions, open houses and industry association meetings.

Social Media means websites and applications, including blogs, social networking forums such as Facebook and Twitter, LinkedIn and photo/video sharing sites that enable users to create and share content or to participate in social networking.

Securities Laws means applicable legislation, regulations and standards concerning securities markets and financial reporting, including those of the



Canadian and U.S. securities regulators and the Toronto and New York Stock Exchanges.

TransCanada or the Company means TransCanada Corporation and its wholly-owned subsidiaries and operated entities.

Visual Standards means the standards approved by the Communications Department.

POLICY

The focus of TransCanada communications is to protect and enhance the Company's reputation. Clear communication internally and externally is key to facilitating transparent and informed dialogue with a diverse audience.

TransCanada's communications will be:

- integrated – reflecting broad communication goals and the needs of all internal parties who have a role in communicating;
- consistent – aligned with the Brand and consistent across all audiences;
- timely – providing stakeholders with relevant information in a timely manner and consistent with applicable Securities Laws;
- clear – reflective of our Company values and clear, concise, relevant, and understandable; and
- current – external and internal messaging must be accurate and aligned with the Company's communications strategy.

The creation of official Company pages on Social Media must be approved by the Director of Corporate Communications. All external communications messaging must be approved by the Director for the applicable business unit.

Designated Spokespersons

In order for TransCanada's communications to accurately reflect the Company's policies, goals and objectives, it is essential that Company spokespersons are those individuals whom are subject matter experts with comprehensive Company knowledge and formal Media training.

Authorized spokespersons are established in the [Public Disclosure Policy](#).



The authorized spokespersons act as TransCanada's principal spokespersons on Company-wide matters and industry issues, as applicable. TransCanada does not allow the use of third party/external spokespersons for marketing or other communications activities without prior approval by the Director of Corporate Communications and the Vice President of the applicable business unit.

The spokesperson will be directed and permitted by the Communications Department to make statements and/or to issue statements on behalf of TransCanada to the Media. Messaging will be developed and approved by the Communications Department, in consultation with the appropriate content experts.

Company spokespersons must be kept informed about pertinent activities in all parts of the Company and about questions from external stakeholders in order to be effective in external and internal communications. Media contacts or other external contacts of material importance must be reported to the Communications Department.

Public Events

Personnel must obtain written approval from their leader prior to speaking or presenting at Public Events.

If approved to speak or present at Public Events on behalf of the Company, Personnel must:

- contact the Communications Department to ensure material is aligned to the [TransCanada Corporate Brand Standards Manual](#);
- ensure materials are reviewed in advance by their leader and, if information pertains to business operations or disclosing financial information, the directors or managers in Corporate and Business Unit Communications, Vice-President Investor Relations, Vice-President Finance and any other person they deem appropriate;
- be aware of and prepared for the Media; and
- follow approved messages and talking points related to the approved presentation or subject matter and not discuss non-public information related to business operations or financial information.

All enquiries from the Media must be directed to the [Media Relations Line](#) or the [Communications Department](#).



Personal Social Media Use

When using personal Social Media while at work or off-duty, Personnel should exercise good judgment and ensure that published comments do not reflect negatively on themselves or the Company.

In accordance with TransCanada's [Public Disclosure Policy](#) and to ensure compliance with Securities Laws while using Social Media, Personnel must:

- identify themselves as TransCanada Personnel whenever posting content that may be related to Company interests so as to avoid misleading internet readers and disclose that views are their own and do not necessarily represent the views or opinions of the Company or its management;
- ensure that they do not disclose confidential, proprietary, or non-public information;
- use a personal email address; and
- ensure that they do not link to or speak on behalf of TransCanada.

Personnel who choose to voluntarily participate in Company organized advocacy initiatives must only use approved materials and follow any applicable guidelines provided by the Company.

In accordance with TransCanada's [Acceptable Use Policy](#), Personnel should have no expectation of privacy in any Social Media post, conversation, or message transmitted to, received or printed from, or stored or recorded on Company resources.

In accordance with TransCanada's [Harassment Free Workplace Policy](#), the posting of Inappropriate Content (not otherwise protected or required by law) on any Media platform may result in legal or disciplinary action, up to and including the termination of employment or contractual relationship.

Nothing in this Policy precludes or dissuades discussions among Personnel about wages, terms and conditions of employment or other legally protected or required activities.

Questions about what is appropriate to post on Social Media may be directed to the Corporate Communications Department. Personnel may also refer to the TransCanada [Social Media Tips](#) document for more information on acceptable Social Media use. In appropriate circumstances, TransCanada may request revisions to, or the removal of, certain Social Media communications.



Third Party Endorsements

All third-party requests to use TransCanada's logo, name, Company Content or statements by Personnel in news releases, promotional materials, advertising, or other documentation, electronic or print must be consistent with TransCanada's Brand strategy and approved by the Director of Corporate Communications.

Co-branding

The Company's name, logo or any aspect of TransCanada's visual identity may be used in conjunction with business partners or industry associations in marketing and communications materials where it is to the mutual benefit of both parties. All requests to use TransCanada's logo or name in co-branded promotional materials or advertising must be approved by the Manager of Corporate Communications & Marketing.

Photography or Filming of Company Premises

All requests for photography or filming of Company facilities must be approved by the Manager of Corporate Communications & Marketing.

A [photo release form](#) must be completed prior to using any person's photos for marketing or communications materials.

Use of Stock Photography and Copyright Protected Materials

Copyrighted materials include, but are not limited to, music, films, clips from TV shows, videos, illustrations, photography, and any images of well-known or identifiable people. Personnel must obtain usage rights for copyrighted materials prior to use for internal and external communications and marketing purposes.

Use of stock images for marketing and communications materials, both externally and internally, is managed by the Corporate Communications Department. Any use of stock photography used in internal or external communications must come directly from the [approved library of stock images](#) and must comply with the [TransCanada Corporate Brand Standards Manual](#) and all applicable licensing agreements associated with the use of such images.

Reproduction of Company Documentation

Any requests to reproduce, in whole or in part, Company Content must be approved by the Manager of Corporate Communications & Marketing.



Canada's Anti-Spam Legislation

Explicit consent for any commercial electronic/internet communications must be obtained from the intended recipient in accordance with TransCanada's practices for Canada's Anti-Spam Legislation compliance in advance of sending any such communications. Such consent is required in relation to commercial electronic/internet communications sent from and received by Canadian email addresses, including those messages received in Canada and sent from the United States or Mexico. Any messages sent and received wholly within the United States and Mexico are not affected.

In cases where external recipients choose to unsubscribe to TransCanada's electronic/internet communications, no further communications may be sent from within TransCanada beyond ten (10) days from the date the unsubscribe request is submitted.

COMPLIANCE

Personnel must comply with all aspects of this document and support others in doing so. Personnel are responsible for promptly reporting suspected or actual violation of this document, applicable law, or any other concern, through available channels so that it can be appropriately investigated, addressed and handled. Personnel who fail to comply, or knowingly permit Personnel under their supervision to not comply, may be subject to appropriate corrective disciplinary action in accordance with the company's policies and process. Please refer to the TransCanada Corporate Policies website for more information.

NON-RETALIATION

We support and encourage Personnel to report suspected incidents of non-compliance with applicable laws, regulations, and authorizations, as well as hazards, potential hazards, incidents involving health and safety or the environment, and near hits. We take every report seriously, investigate each report to identify facts, and effect improvements to our practices and procedures when warranted. All Personnel making reports in good faith will be protected. Good Faith Reporting is intended to remove protection for Personnel making intentionally false or malicious reports, or who seek to exempt their own negligence or willful misconduct by the act of making a report. We ensure immunity from disciplinary action or retaliation for Personnel for the Good Faith Reporting of such concerns.



Reports can be made to management, a compliance coordinator, or anonymously to the ethics helpline.

REFERENCES AND LINKS

- [Policy Questions and Comments](#)
- [Acceptable Use Policy](#)
- [Code of Business Ethics](#)
- [Communications Contact Information](#)
- [Insider Trading Policy](#)
- [Political Activities and Contributions Policy](#)
- [Protection of Personal Information Policy](#)
- [Public Disclosure Policy](#)
- [Social Media Tips](#)
- [TransCanada Corporate Brand Standards Manual](#)