



EQUAL EMPLOYMENT OPPORTUNITY AND NON-DISCRIMINATION POLICY

PURPOSE AND SCOPE

The purpose of this Policy is to ensure no barriers or discrimination exist regarding any aspect of employment for TransCanada Employees and job applicants, and to outline TransCanada's commitment to equal employment opportunity for all people regardless of race, colour, gender, sexual orientation, marital status, religion, national origin, age, physical or mental disability, veteran status or other grounds protected by law.

This Policy applies to all TransCanada Employees and job applicants. Where a conflict exists between this Policy and any collective bargaining agreement, the collective bargaining agreement applies.

Requests for accommodation are managed in accordance with the Reasonable Workplace Accommodation Policy.

DEFINITIONS

Affirmative Action means application of measures to increase representation of groups historically excluded or underrepresented in the United States, such as women and minorities.

Designated or Protected Groups means those for whom TransCanada has legal obligations in Canada and the United States. Designated Groups in Canada are women, Aboriginal peoples, visible minorities and people with disabilities. Protected Groups in the United States include but are not limited to women, racial minorities, individuals with disabilities, protected veterans or people protected by state or federal law.

Employee means full and part-time TransCanada employees including all categories of student employees.

Employment Equity in Canada means processes, actions and measures to ensure representation of Designated Groups at TransCanada.

Equal Employment Opportunity (EEO) in the United States means all Employees or job applicants regardless of race, colour, gender, sexual orientation, marital status,



religion, national origin, age, physical or mental disability, veteran status or other grounds protected by law have the right to a fair and equal employment opportunity.

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

Personnel means full-time and part-time Employees, contract workers, contractors and consultants of TransCanada.

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

POLICY

TransCanada is an equal opportunity employer and ensures that its Employees and job applicants are provided with opportunities based on their proven ability and qualifications and objective occupational requirements in compliance with all applicable federal, state, provincial, and local laws.

Considering race, national or ethnic origin, colour, religion, age, sex, sexual orientation and identity, marital status, family status, veteran status, physical or mental disability, conviction for an offence for which a pardon has been granted or other grounds protected by law is prohibited in every aspect of employment opportunity, including but not limited to recruitment, training, compensation and other benefits, promotion, transfer and termination.

As a United States federal contractor and Canadian federally regulated employer, TransCanada reports workforce demographic and qualitative data to government agencies. The Company also prepares and implements Affirmative Action and Employment Equity plans in meeting its equal employment and affirmative action responsibilities. TransCanada regularly reviews its policies and procedures and coordinates Company-wide efforts to improve representation of Designated and Protected Groups and other groups protected by law.

RESPONSIBILITIES

Employees, leaders and the Human Resources department are responsible for ensuring equal employment and non-discrimination in the workplace.

Employees

Employees are responsible for:



- being educated about and recognizing the diversity that exists at TransCanada and among its stakeholders;
- recognizing the value of different perspectives and experiences and the varied approaches required to address the needs of people with differing backgrounds;
- respectfully managing differences experienced through everyday interactions with others; and
- reporting inappropriate behaviours when needed using the resources outlined in this Policy.

Leaders

Leaders are responsible for:

- promoting and enabling practices so all qualified people receive equal consideration in employment opportunities and practices;
- serving as role models by becoming educated about, and complying with, TransCanada's legal diversity obligations, and supporting Employees in doing so;
- implementing TransCanada's Equal Employment Opportunity obligations, Affirmative Action or Employment Equity plans, and other existing diversity and inclusion strategies within their area of responsibility; and
- removing barriers that may be causing inequity or disadvantage within their area of responsibility.

Human Resources

Human Resources is responsible for:

- obtaining qualitative and quantitative data to comply with legal obligations;
- using data to identify and eliminate discriminatory practices or barriers, considering what may be required by law, collective bargaining agreements or objective occupational requirements;
- complying with all diversity-related legal requirements on behalf of TransCanada;
- preparing and filing required reports with government agencies;
- creating and overseeing implementation of Equal Employment Opportunity, and Affirmative Action and Employment Equity plans, and other existing diversity and inclusion strategies;
- implementing this Policy;
- providing training, education and coaching to help Employees foster a respectful and inclusive workplace; and



- investigating reports of inappropriate behaviour in breach of this Policy.

RESOLUTION PROCESS

Allegations of discrimination are taken seriously and dealt with consistently, promptly and in a respectful, fair and thorough manner by trained investigators.

Employees who believe they have been subject to discrimination in violation of this Policy, TransCanada's Code of Business Ethics Policy, or the law may report their concerns using one of the following resources to resolve their concerns:

- a leader in the Employee's reporting chain;
- another leader at the Company;
- TransCanada's Respectful Workplace Coordinator;
- a Human Resources Consultant; or
- TransCanada's Ethics Help Line.

Job applicants who believe they have been subject to discrimination may file a complaint through TransCanada's Ethics Help Line.

Complaints are reviewed and assessed by the Human Resources Governance Department and additional information may be required from the Employee or job applicant who filed the complaint. Based on the assessment, the Human Resources Governance Department will determine if an investigation is required or another avenue, such as personal or facilitated resolution, is more appropriate to effectively resolve the situation. If an investigation is necessary, the Human Resources Governance Department will conduct the investigation in consultation with TransCanada's Law Department.

During assessment of complaints and investigations, confidentiality will be maintained to the greatest extent possible and in accordance with the Protection of Personal Information Policy, as applicable. Investigation details will be shared with only those individuals who require the information for investigation, resolution, decision making, and corrective-action implementation purposes or where required by law.

Follow-Up Action

Following the completion of an investigation, the Human Resources Governance Department may take appropriate action to confirm discrimination has stopped, no retaliation has occurred, and work groups are functioning effectively.



Resolution Timelines

TransCanada makes every reasonable effort to resolve discrimination complaints as soon as possible with high priority placed on the resolution process. Timelines for investigating and resolving alleged discrimination depend on the complexity of each complaint. Every effort is made to conduct investigations in a timely manner.

COMPLIANCE

Personnel must comply with all aspects of this Policy and support others in doing so. Personnel are responsible for promptly reporting suspected or actual violation of this Policy, 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, up to and including termination of employment, termination of contract or removal from the Company's worksite in accordance with the Company's Policies and processes. Please refer to the TransCanada Corporate Policies website for more information.

NON-RETALIATION

TransCanada encourages Personnel to report suspected incidents of non-compliance with applicable laws, regulations, policies and authorizations, as well as hazards, potential hazards, incidents involving health and safety or the environment, and near hits. TransCanada takes every report seriously, investigates each report to identify facts, and effects improvements to our practices and procedures when warranted. All Personnel making reports in good faith will be protected from retaliation. Good Faith Reporting is not intended to protect 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.

REFERENCES AND LINKS

- [Policy Questions and Comments](#)
- Code of Business Ethics Policy
- Harassment-Free Workplace Policy
- Protection of Personal Information Policy
- Reasonable Workplace Accommodation Policy
- Equal Employment Opportunity Commission



- Executive Order 11246
- Jobs for Veterans Act (JVA)
- Rehabilitation Act
- Vietnam Era Veterans Readjustment Assistance Act (VEVRAA)