



REASONABLE WORKPLACE ACCOMMODATION POLICY

PURPOSE AND SCOPE

The purpose of this Policy is to ensure TransCanada's work environment is inclusive and non-discriminatory by establishing effective mechanisms and responsibilities for responding to individual Reasonable Accommodation requests of existing and potential Employees.

This Policy applies to all TransCanada Employees.

DEFINITIONS

Employee means full and part-time Employees including student Employees.

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

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

Reasonable Accommodation means modifying the work environment or processes to eliminate barriers in the workplace for individuals or groups that are qualified to safely and efficiently perform the essential duties of the job. Essential job duties of a role cannot be eliminated as a form of Reasonable Accommodation. Reasonable Accommodations can be provided for different reasons, including, but not limited to, religion, sexual orientation and identity, family and marital status, disability, and other protected grounds.

Office of the Respectful Workplace Advisor means a team within the HR Compliance and Programs Department, responsible for managing or overseeing the Reasonable Accommodation process of Employees and job applicants on behalf of the Company and ensuring TransCanada is compliant with applicable law and related internal policies, programs and practices.

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



POLICY

TransCanada provides Reasonable Accommodation in the workplace to ensure that individuals who are otherwise able to do their jobs effectively are not unfairly excluded from doing so. Reasonable Accommodation will be provided when working conditions can be adjusted without causing undue hardship to the Company and/or its Personnel. The Company treats all Employees and job applicants who request Reasonable Accommodation with respect and dignity. All Reasonable Accommodation requests are dealt with in a timely, confidential and sensitive manner.

The Reasonable Accommodation process is a shared responsibility between the Company and its Personnel and job applicants. Employees and job applicants are responsible for making Reasonable Accommodation needs known, to the extent that they are able, to the Company through available channels.

Reasonable Accommodation Process

Job Applicants

When contacted for an interview, the Recruitment Consultant or the hiring leader must advise job applicants that TransCanada has a Reasonable Workplace Accommodation Policy and ask whether Reasonable Accommodation is required to participate in the hiring and selection processes.

The Recruitment Consultant or hiring leader will decide immediately if the need identified by the job applicant can be accommodated for the interview and will inform the job applicant of her or his decision. In these cases the Recruitment Consultant or hiring leader will inform the Office of the Respectful Workplace Advisor that a request for Reasonable Accommodation was received and resolved.

If the Recruitment Consultant or hiring leader cannot make a determination, he or she will contact the Office of the Respectful Workplace Advisor. The Office of the Respectful Workplace Advisor will then evaluate, request additional information if needed, and decide whether or not the Reasonable Accommodation is approved or denied. These requests will be handled and resolved within 48 hours, so that the job applicant is not at a disadvantage with respect to other candidates and can fully participate in the selection process.

If the job applicant's request is approved, the Office of the Respectful Workplace Advisor will work with the hiring leader or Recruitment Consultant to ensure the



Reasonable Accommodation is provided. If the job applicant's request is denied, the Office of the Respectful Workplace Advisor will clearly explain and communicate the reasoning to the job applicant.

Employees

Request and assessment

An Employee can request Reasonable Accommodation by emailing the Office of the Respectful Workplace Advisor. If leaders or Human Resources Consultants receive a request for Reasonable Accommodation or become aware of an Employee need for Reasonable Accommodation, they must immediately notify the Office of the Respectful Workplace Advisor of such need.

Upon receiving a Reasonable Accommodation request, the Office of the Respectful Workplace Advisor will conduct an initial assessment and decide if the process outlined in this Policy is applicable or if the request is covered under a different policy, program or employment practice. If a different process is applicable, the request will be forwarded to the appropriate department and the Employee, their leader and Human Resources Consultant will be informed of the decision and available resources. The Office of the Respectful Workplace Advisor will keep a record of these cases.

If the Office of the Respectful Workplace Advisor determines that the request should be processed under this Policy, the request, decisions and agreement will be documented through the Reasonable Accommodation Request Form.

At any point, the Office of the Respectful Workplace Advisor may request additional supporting information or documentation from the Employee, the relevant leader, Human Resources Consultant, other Departments or experts as required, in order to come to an informed decision.

Decision

After the assessment, the Office of the Respectful Workplace Advisor will either:

- approve the Reasonable Accommodation Request. In this case the Reasonable Accommodation Advisor, with input from the Employee, leader and Human Resources Consultant, and experts as applicable, will recommend possible options and facilitate the implementation of the chosen Reasonable Accommodation; or



- deny the Reasonable Accommodation request. The Respectful Workplace Advisor will clearly explain and communicate the rationale to the Employee in writing. A denial of a Reasonable Accommodation does not prevent the Employee from appealing the decision or making another request at a later time if circumstances change.

Timing

The timelines, expertise required and outcomes may vary significantly for Reasonable Accommodation requests. The Company is committed to achieving timely resolution. Estimated timelines will be provided to the Employee once the situation is better evaluated and the Employee will be kept apprised of the progress and any decisions.

Review, modification and conclusion

Reasonable Accommodation agreements will be reviewed by the Office of the Respectful Workplace Advisor, Human Resources Consultant, leaders and Employees in the time specified within the Request for Accommodation Form or sooner if required.

Should any modifications be proposed for an existing agreement, the Office of the Respectful Workplace Advisor will work with the Employee, their leader and the Human Resources Consultant to determine whether an updated agreement is possible.

The Employee is responsible for advising the Office of the Respectful Workplace Advisor when the need for Reasonable Accommodation ends. The Office of the Respectful Workplace Advisor will document, communicate and file changes to the agreement or termination of Reasonable Accommodation as appropriate.

Appeal Process

Employees and job applicants can appeal a denial for Reasonable Accommodation through the Office of the Respectful Workplace Advisor. The Office of the Respectful Workplace Advisor will send the file to the Vice-President, Corporate Compliance and Internal Audit, for review of the initial decision.

The Employee or job applicant will be informed of the appeal decision and provided with a written response that will include next steps.



Record Keeping

The Office of the Respectful Workplace Advisor is responsible for tracking accommodation efforts across the Company, and retaining and filing all executed Reasonable Accommodation Request Forms.

Privacy and Confidentiality

All information relating to requests for Reasonable Accommodation will be kept confidential and will only be shared with those directly involved in the decision making process in a need-to-know basis.

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 in accordance with the Company's Policies and processes. 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](#)
- Request for Accommodation Form
- Code of Business Ethics Policy
- Harassment-Free Workplace Policy