



# SUPPLIER DIVERSITY AND LOCAL PARTICIPATION POLICY

## INTRODUCTION

TransCanada contributes to the social and economic well-being of communities that are adjacent to, or are potentially impacted by, our business. We endeavor to create opportunities for qualified Local and/or Diverse Suppliers and Individuals to benefit from our projects and operations. This is important for securing public confidence where we build and operate. It also provides TransCanada with a competitive advantage as a leader in Supplier Diversity and Local Participation among energy infrastructure companies in North America.

## PURPOSE AND SCOPE

TransCanada's capital and operational activities provide potential socio-economic benefits in communities where we do business. Energy infrastructure projects, including pipelines, power generation and gas storage, require significant amounts of goods, materials and services. It is important that these opportunities lead to greater participation by qualified Local and/or Diverse Suppliers and Individuals. A number of existing TransCanada programs support these potential benefits, including Aboriginal Contracting, Community Investment, and the Supplier Diversity and Local Participation Program.

This policy ("Policy") provides the framework to enhance the opportunities and participation of Local and/or Diverse Suppliers and Individuals in TransCanada's projects and operations. The Policy reinforces our commitment to creating sustainable legacies in the communities where we live and work.

This Policy applies to all Personnel (defined as all full-time and part-time employees, contract workers and contractors) of TransCanada Corporation and its wholly-owned subsidiaries whether operating in Canada, the United States and Mexico, hereafter referred to as the "Company".

## DEFINITIONS

**Diverse Individual** is a person who belongs to at least one of the following groups: Aboriginal (Canada); Minority (USA); Indigenous (Mexico); Visible Minority



(Canada); Women; Individual/Person with a Disability; and Veteran (USA – includes service-disabled).

**Diverse Supplier** is a business that supplies goods, materials or services, and is wholly or partially owned by an individual (or individuals) belonging to at least one of the following groups: Aboriginal including a Band (Canada); Minority including a Tribe (USA); Indigenous (Mexico); Visible Minority (Canada); Women; and Veteran (USA – includes service-disabled).

**Local and/or Diverse Suppliers and Individuals** are Diverse Suppliers, Diverse Individuals, Local Suppliers and/or Local Individuals.

**Local Individual** is a person who has a substantial attachment to or connection with communities which are located adjacent to, or are potentially impacted by, our construction and operations. This can include both the communities immediately surrounding our work as well as the broader municipality, county, or regional district and is identified based on the socio-economic characteristics of the region and varies according to each project or operation. The exact specification of what local is will be determined on a project by project basis as part of the stakeholder engagement process.

**Local Supplier** is a business that supplies goods, materials or services, and is wholly or partially owned by an individual (or individuals) that has (have) a substantial attachment to or connection with communities which are located adjacent to, or are potentially impacted by, our construction and operations. This can include both the communities immediately surrounding our work as well as the broader municipality, county, or regional district and is identified based on the socio-economic characteristics of the region and varies according to each project or operation. The exact specification of what local is will be determined on a project by project basis as part of the stakeholder engagement process.

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

**Supplier Diversity** is a proactive and strategic business process that seeks to provide qualified Diverse Suppliers and Individuals with equal opportunity to become suppliers/contractors to major corporations.



## **POLICY**

TransCanada will assist Local and/or Diverse Suppliers and Individuals to participate in opportunities related to Company projects and operations through:

- Encouraging the identification, qualification, employment and contracting of Local and/or Diverse Suppliers and Individuals across the Company's supplier lifecycle management process;
- Developing and executing procurement policies, processes, systems and tools that enable greater participation by qualified Local and/or Diverse Suppliers and Individuals;
- Identifying and communicating viable contracting and procurement opportunities for which qualified Local and/or Diverse Suppliers and Individuals can compete;
- Supporting targeted community investments that contribute to the development of Local and/or Diverse Suppliers and Individuals;
- Designing, implementing and supporting education and training programs that help develop the skills, knowledge and capacity of Local and/or Diverse Suppliers and Individuals; and
- Tracking Company performance with regards to Local and/or Diverse Suppliers and Individuals participation in Company opportunities, and regularly reporting the results internally and externally.

## **RESPONSIBILITIES**

The following departments are fundamental to the Company's commitment to enabling socio-economic opportunities for Local and/or Diverse Suppliers and Individuals.

### **Supply Chain**

Supply Chain is responsible for providing the tools and processes required to implement this Policy specific to contracting and procurement. Supply Chain resources will also support Major Projects in tracking and reporting data consistent with this Policy.

### **Major Projects**

Major Projects is responsible for providing the project-specific requirements for labour, services and materials, and collaborating with Supply Chain, Community



Relations, Aboriginal & Tribal Relations, Community Investment, and Communications teams on implementing the Policy.

Within applicable Major Projects, the Supplier Diversity and Local Participation Program is responsible for supporting the development of strategies, tools and processes to ensure the inclusion of Local and/or Diverse Suppliers and Individuals in contracting and procurement opportunities; assisting in the tracking and reporting of Local and/or Diverse Suppliers and Individuals data; identifying capacity development opportunities; and monitoring the continuous improvement of the Supplier Diversity and Local Participation Program.

### **Community and Sustainability**

Community Relations and Aboriginal & Tribal Relations are responsible for providing advocacy and implementation of this Policy as part of ongoing stakeholder engagement in communities adjacent to our projects and operations, including the identification of Local and/or Diverse Suppliers and Individuals.

### **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](#)
- Aboriginal Relations Policy
- CPMS Manage External Project Stakeholders
- Stakeholder Engagement Commitment Statement