

Indigenous Relations Policy

Policy statement

The purpose of this Policy is to ensure that Team Members pursue and develop long-term mutually beneficial relationships with Indigenous Groups in support of the Company's business and corporate social responsibility objectives across Canada and the United States.

This Policy sets expectations for, and guides the Company's collaborative partnerships with Indigenous Groups aiming to build and sustain Indigenous support for South Bow's projects and operations through early, transparent and frequent engagement, by understanding and mitigation impacts and creating mutually-beneficial partnerships.

Scope

This Policy applies to all Team Members and must be implemented in alignment with South Bow's Code of Business Ethics Policy.

Principles

1 Respect and recognition

- 1.1 When engaging and collaborating with Indigenous Groups, we will respect the spirit and intent of the [United Nations Declaration on the Rights of Indigenous Peoples](#) (UNDRIP) and its guiding principles within the context of existing Canadian and U.S. law, and the associated commitments and roles that governments in those jurisdictions have, relative to Indigenous Groups.
- 1.2 When conducting business activities on behalf of South Bow we will recognize and respect that Indigenous Peoples are rightsholders who may have a unique connection to the land and resources associated with South Bow's business activities, and that there are often separate organizational and governance structures and political institutions from those of the jurisdictions they fall under. We will ensure that they are conducting any such business activities with integrity, mutual responsibility and collaboration.

2 Inclusion and participation

- 2.1 When engaging in consultation related activities with Indigenous Groups, we will meaningfully engage in a timely manner, share information, seek to understand concerns and interests, and collaboratively work to mitigate potential impacts of our business activities.

- 2.2 We will use reasonable opportunities to engage Indigenous Groups to:
- a) align their capacity and capabilities with the Company's project and/or operational requirements and qualifications;
 - b) support community-led initiatives;
 - c) develop skills in the local workforce compatible with industry needs; and
 - d) provide opportunities for economic partnerships.

Your responsibility

Team Members must follow all applicable provisions and the spirit and intent of this Policy and support others in doing so. You must promptly report any suspected or actual violation of this Policy through available [channels](#) so that South Bow can investigate and address it appropriately. Those who violate this Policy or knowingly permit others under their supervision to violate it may be subject to appropriate corrective action, up to and including termination of employment or contract, as applicable, in accordance with the Company's corporate governance documents, employment practices, contracts, and agreements.

South Bow supports the reporting of suspected breaches of governance, laws, regulations, health, safety, environmental incidents, and near hits, and takes all reports seriously. Those who report in good faith are protected from retaliation, though this protection does not extend to intentionally false or malicious reports or attempts to shield personal negligence or misconduct.

Interpretation and administration

The Company has sole discretion to interpret, administer and apply this corporate governance document and to change it at any time to address new or changed legal requirements or business circumstances.

Definitions

Engagement means the activities conducted by South Bow to identify, understand and consider the potential effects of South Bow's business activities on Indigenous groups, with the intention to substantively address them.

Indigenous Groups means any combination of Aboriginal and Indigenous Peoples, communities or organizations.

Indigenous Peoples means Aboriginal Peoples and Indians of Canada and the United States, respectively.

South Bow or the **Company** means South Bow Corporation and its wholly-owned subsidiaries and/or operated entities.

Team Members means full-time, part-time and temporary Employees and Contingent Workforce Contractors of South Bow.

References

Related corporate governance and supporting documents

- Code of Business Ethics Policy

Other references

- [United Nations Declaration on the Rights of Indigenous Peoples](#)

How to contact us

- [Policy Questions and Comments](#)

South Bow's reporting channels

- [Ethics Helpline](#)
- [Corporate Compliance](#)
- [Human Resources](#)
- Legal department
- Compliance Coordinators