

Subject: CORPORATE SOCIAL RESPONSIBILITY	Sector: Internal Audit and Risk Management
	Number 3.0
	Date: June 14 th 2013. Revised on Nov 1st, 2014, Nov.2 nd 2016.

1.0. Purpose and Mission

This Policy sets out Cogeco’s approach towards Corporate Social Responsibility (“CSR”).

Many of the principles or “pillars” of this Policy are already listed among the core principles stated in the Corporation’s Code of Ethics. This policy further builds on these important principles in order to foster and support the conduct of the Corporation’s business in a socially responsible and ethical manner; and to add significant value to our shareholders. In developing these principles Cogeco took into consideration the three dimensions of CSR, which are: environmental, social and economic. This CSR Policy enables the Corporation to develop, strengthen and align a culture of sustainability and competitive profitability in all business units, in line with its CSR Mission:

To support sustainability through responsible and ethical management and operating practices. We strive to meet the expectations of our stakeholders by:

- Being effective environmental stewards.
- Making a positive impact on the communities where we live and work.
- Adding significant value for our shareholders.

2.0. Scope

This CSR Policy applies to all employees of Cogeco Inc., its business units (“Cogeco”, the “Corporation” or “we”).

3.0. Principles

The following six key principles or pillars guide the business activities of all Cogeco employees:

1- Manage our Environmental Footprint

We care for the environment in our activities and operations. While our activities and operations may be said to have a smaller environmental footprint compared to other industries, we are nevertheless committed to progressively reducing our environmental footprint by:

- a) Encouraging the optimal and efficient use of natural resources: energy, water, raw materials and paper.

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- b) Helping fight climate change by measuring, managing and reducing our emissions of pollutants and GHG.
- c) Reducing waste and ensuring it is properly recovered and disposed of, notably electronic waste.
- d) Monitoring environmental risks and implementing corrective actions, if needed, in a timely manner.

2- Take Part in Developing Communities

We care about the communities we serve and we take part in their development by:

- a) Maintaining a local presence and strong ties with the communities where we operate.
- b) Contributing to local initiatives and events through our community television services - where available- and through the radio stations in the markets we serve.
- c) Supporting local economic development by choosing suppliers in our area, in line with our procurement policy, and by providing employment where we are located.
- d) Supporting social and cultural development through donations and sponsorships, and by encouraging community volunteering and involvement among our employees.

3- Take Part in Developing our Employees

We believe our employees are an important asset and we seek to participate in their professional development and well-being by:

- a) Offering competitive working conditions that favour employee well-being, health, safety and diversity.
- b) Contributing to a work environment that is free of any form of discrimination or harassment and that respects human rights.
- c) Developing and implementing programs that favour professional development.
- d) Encouraging awareness and socially responsible behaviour among our employees.

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4- Integrate the Best CSR Practices

CSR is rapidly gaining ground, driven by a variety of stakeholders (governments, investors, non-governmental organizations, etc.). To ensure its own approach to CSR remains in line with best practices, it is Cogeco’s intention to:

- a) Monitor the best CSR practices in the fields of telecommunications and electronic services and, when suitable, adapt its Policy accordingly.
- b) Continually look for improvements and propose energy-efficient products and services to its customers.
- c) Assess its suppliers’ integration of sustainable development principles in their operations, in line with the expectations set out in our [Supplier Code of Conduct](#).
- d) Favour suppliers who demonstrate sound management of their environmental and social impacts.

5- Be Transparent in Communicating our CSR Activities

Cogeco is committed to measuring and publicly reporting performance on its CSR program. It uses recognized standards to ensure its reporting is transparent and provides a fair representation of its performance. In the course of its activities, the Corporation intends to:

- a) Publish a Corporate Social Responsibility report every two years in accordance with the *Global Reporting Initiative* (GRI) standard.
- b) Publish a *Carbon Disclosure Project* (CDP) report annually.
- c) Promote the CSR Policy with its employees, customers and suppliers.
- d) Communicate in a clear and fair way on its environmental and social performance.

6- Ensure the Corporation’s Growth Sustained by Sound Corporate Governance Practices

Cogeco is committed to achieving and maintaining high standards of corporate governance and ethics and endeavours to:

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- a) Integrate proper and sound corporate governance practices in all of its spheres of activities.
- b) Promote adherence to the best business practices and the prevalence of honesty, transparency, loyalty and efficiency in its dealings with people and businesses.
- c) Maintain respectful and transparent relationships with its customers through excellent customer service and honest marketing of its products.
- d) Ensure that the business and actions of the Corporation comply with the law in all material respects.

4.0. Responsibilities

Corporate social responsibility falls within the competence of the Corporate Governance Committee which is responsible for reviewing the CSR policy and any material change to it and recommending its adoption by the Board.

The Head of CSR is responsible for communicating and overseeing the implementation of this Policy.

The Head of CSR is also responsible for the elaboration of corporate strategies and initiatives to promote the CSR principles identified above and ultimately support the conduct of business in a socially responsible and ethical manner.

A CSR Steering Committee, composed of Senior Executives of Cogeco and its business units, meets at a minimum on a biannual basis and is responsible for:

- a) Selecting key performance indicators and setting goals to be achieved by the Corporation. These performance indicators and objectives will help monitor the Corporation's progress and performance from a CSR perspective.
- b) Periodically reviewing the CSR Policy.

Each business unit of Cogeco is responsible for implementing the initiatives and strategies defined by the CSR Steering Committee.

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5.0. Related Policies and Procedures

- Cogeco Code of Ethics
- Supplier Code of Conduct
- Communication Policy
- Procurement Policy

6.0. Revision

Due to the evolving nature of issues related to CSR, and to ensure it remains current and relevant, this Policy shall be reviewed regularly but no later than every five years.

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