

***Statement against Slavery, Forced Labor and Human Trafficking  
May 2016***

*Background information*

Cogeco Inc., (the Corporation or Cogeco) operates in the communications and media sectors. The corporation provides its residential and business customers with video, Internet and telephony services through its two-way broadband fibre networks. It also provides its business customers with a suite of information and communications technology services (colocation, network connectivity, managed hosting, cloud services and managed IT services), through its 17 data centres, extensive FastFiber Network™ and more than 50 points-of-presence in North America and Europe. Cogeco owns and operates 13 radio stations across most of Québec with complementary radio formats serving a wide range of audiences as well as Cogeco News, its news agency.

The Corporation, parent-company of Cogeco Peer 1, acknowledges the important role that suppliers play in its corporate social responsibility efforts, especially with regards to the environmental and social impacts of their activities. Cogeco has designed a [Corporate Social Responsibility \(CSR\) policy](#) aimed at conducting all its operations in a productive and sustainable manner. This Statement intends to focus specifically on the issues of Slavery, Forced Labor and Human Trafficking, in order to comply with the *UK Modern Slavery Act (2015)*.

The Corporation wishes to engage in business with suppliers that demonstrate strong commitment to sustainability and ethical behaviour. Given the globalized and complex dimension of its supply chain, there are various associated social, environmental and ethical risks that need to be addressed, especially with suppliers located in developing and emerging economies. Our main supplier categories are network equipment, information technology equipment (including modems and set-top boxes), construction services and professional services..

First of all, Cogeco's [Code of Ethics](#), is applicable to all persons who form part of the Corporation and who contribute to its operations, image and reputation as well as to all consultants and sub-contractors. Personal respect (which includes regards for fundamental rights) is the first principle of the Code of Ethics.

Second of all, since October 2015, the Corporation has developed its [Supplier Code of Conduct](#), which is being progressively implemented starting in fiscal 2016. Our goal is to

have implemented the Supplier Code of Conduct with our top suppliers by 2018. The Code defines our expectations for suppliers and encourages them to go beyond legal compliance drawing upon internationally recognized standards.

Our Supplier Code of Conduct draws from the *Electronic Industry Citizenship Coalition (EICC) Code of Conduct* – although we are not members of the EICC. In line with the United Nations Guiding Principles on Business and Human Rights, the expectations and principles in this Code are derived from key international human rights standards including the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the United Nations Universal Declaration of Human Rights. With regards to Forced Labor, the Supplier Code of Conduct clearly stipulates that:

“It is prohibited to hold an employee in servitude, slavery and to take part in human trafficking. Employees can also leave the facilities’ premises at all times and they should be able to keep their identification papers or work permit. Employees should have the liberty to voluntarily begin and end their employment freely and should not be binded by a debt to the employer or to a third party”.

#### *Due diligence / Performance monitoring*

Cogeco will monitor the performance of its suppliers in relation with the principles set in its Supplier Code of Conduct. It will perform periodic media monitoring and will require completion of self-assessment questionnaires by targeted suppliers, specifically those that are high-risk or who are located in high risk countries. Further, anyone who witnesses a situation of non-compliance with the Supplier Code of Conduct can report the issue by contacting our Ethics line managed by an independent third-party partner (ClearView). All reports are confidential and anonymous and are sent to our Internal Audit team which investigates accordingly. People who report in good faith are protected from dismissal or any other form of retaliation.

The Corporate Social Responsibility team keeps the Corporate Governance Committee of the Board of Directors apprised of the implementation of the Supplier Code of Conduct and the results of the performance monitoring. The Supplier Code of Conduct is reviewed every two years in order to be up to date with the new and changing issues in our supply chain.

### *Accountability*

The Code of Ethics is approved by the Board of Directors and the Supplier Code of Conduct is approved by the Corporate Governance Committee of Cogeco Inc. The Corporate Social Responsibility Team has the responsibility for implementing and monitoring compliance with the Supplier Code of Conduct.

### *Going Forward*

The Corporation will concentrate its efforts on communicating the Supplier Code of Conduct to its top suppliers and developing periodic media monitoring tools to assess and identify the risk of forced labor and human trafficking in its supply chain. The Corporation will seek ways to further improving its processes over time and keeping track of the trends and dynamics of this evolving issue.

Louis Audet  
President and CEO  
Cogeco Inc. and Cogeco Communications Inc.

*Links to corporate documents*

- Code of Ethics: [http://corpo.cogeco.com/cgo/files/4714/6720/8123/Ethic2016\\_ENG.pdf](http://corpo.cogeco.com/cgo/files/4714/6720/8123/Ethic2016_ENG.pdf)

- Supplier Code of Conduct:

[http://corpo.cogeco.com/cca/files/9814/5071/4407/COGECO Supplier Code of Conduct - final version.pdf](http://corpo.cogeco.com/cca/files/9814/5071/4407/COGECO_Supplier_Code_of_Conduct_-_final_version.pdf)

- Corporate Social Responsibility Policy:

[http://corpo.cogeco.com/cca/files/7014/3031/9494/COGECO -  
\\_Corporate Social Responsibility Policy 2.0.pdf](http://corpo.cogeco.com/cca/files/7014/3031/9494/COGECO_-_Corporate_Social_Responsibility_Policy_2.0.pdf)

- Corporate Social Responsibility Report:

[http://corpo.cogeco.com/cca/files/1014/5269/7139/COGECO CSR Report 2016.pdf](http://corpo.cogeco.com/cca/files/1014/5269/7139/COGECO_CSR_Report_2016.pdf)