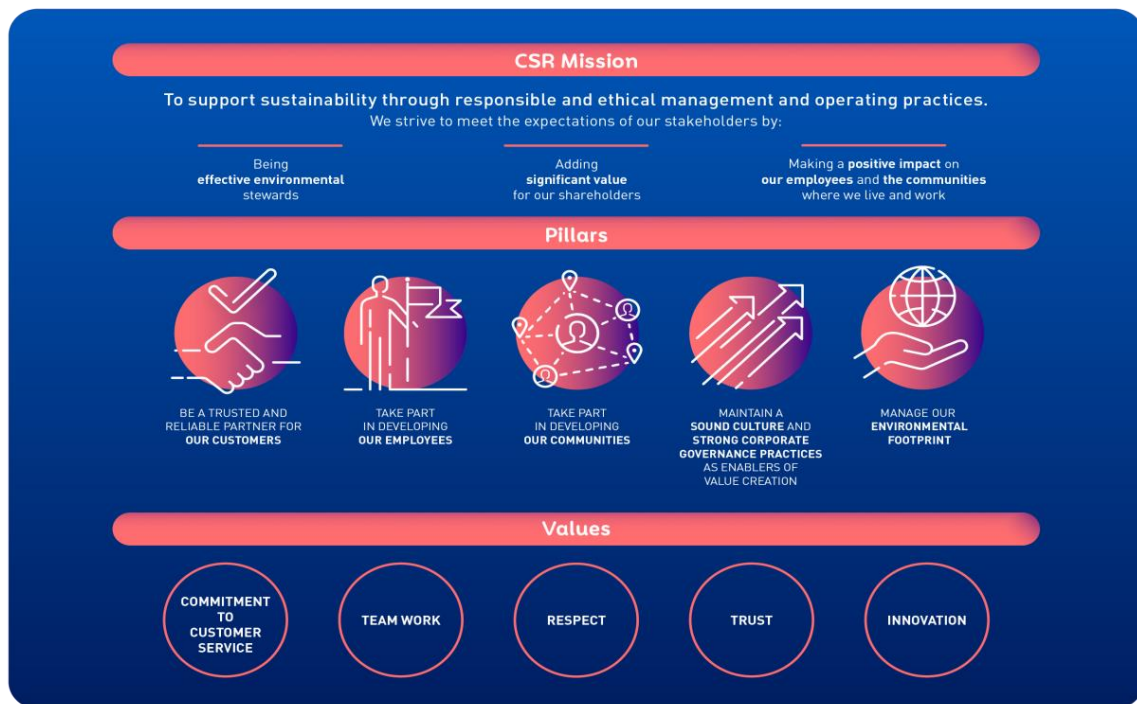


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## 1.0. Purpose and Mission

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 governance (ESG). 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, Pillars and Values.



## 2.0. Scope

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

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**3.0. Principles**

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

**1. Be a Trusted and Reliable Partner for our Customers**

Our mission statement – *Connect our customers to the digital world and create outstanding communication experiences* – puts the customer at the center of our strategies, priorities and daily operations. We strive to be our customers’ trusted and reliable partner by:

- a) Maintaining respectful and transparent relationships with our customers through excellent customer service and honest marketing of our products.
- b) Understanding and meeting our customers’ needs and expectations.
- c) Integrating the best technologies in order to offer innovative and high quality products.
- d) Offering superior customer service through our local representatives and 24/7 technical support.
- e) Providing flexible service offerings.
- f) Implementing best in class privacy and security measures.

**2. Take Part in Developing our Employees**

Our employees are at the heart of everything that we do and they are therefore key enablers of our success as an organization. We seek to participate in their professional development and well-being by:

- a) Offering competitive working conditions that favour employee well-being, health, safety, wellness 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) Providing tools to increase awareness and related socially responsible behaviour among our employees.
- e) Providing open communication channels to ensure constant interaction with our employees.

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**3. Take Part in Developing our Communities**

We are committed to making a difference in the communities where we live and work and aim to be recognized as a trusted community partner. We deeply care about the communities we serve and we strive to 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 our radio stations in the markets we serve.
- c) Supporting local economic development by choosing suppliers in our areas, in line with our Procurement Policy, and by providing employment where we are located.
- d) Supporting social and cultural development through donations and sponsorships, in line with our Donations & Sponsorships Policy and guidelines, and by encouraging community volunteering and involvement among our employees.

**4. Maintain a Sound Culture and Strong Corporate Governance Practices as Enablers of Value Creation.**

Cogeco is committed to achieving and maintaining a sound and positive corporate culture as well as high standards of corporate governance and ethics by:

- a) Ensuring that the business and actions of the Corporation comply with the law in all material respects.
- b) Integrating proper and sound corporate governance practices in all of its spheres of activities.
- c) Promoting adherence to the best business practices and the prevalence of honesty, transparency, loyalty and efficiency in its dealings with people and businesses.
- d) Ensuring that Human Rights are respected along the value chain.
- e) Encouraging suppliers to integrate sustainable development principles in their operations and demonstrating sound management of their environmental and social impacts, in line with the expectations set forth in our Supplier Code of Conduct.
- f) Promoting a corporate culture aligned with the Corporation’s values of commitment to customer service, innovation, respect, teamwork and trust.

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**5. Manage our Environmental Footprint**

We care for the environment and strive to conduct business in an environmentally responsible manner. 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 the environmental footprint of our activities, operations, products and services by:

- a) Encouraging the optimal and efficient use of natural resources: energy, water, raw materials and paper.
- 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 in order to prevent negative environmental impacts and implementing corrective actions, if needed, in a timely manner.
- e) Continually looking for improvements and proposing energy-efficient products and services to our customers.

**4.0. CSR Governance**

Corporate social responsibility falls within the competence of the Corporate Governance Committee of the Board of Directors which is responsible for reviewing the CSR policy and any material changes 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 at the corporate level 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:

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- 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.

### 5.0. Reporting

Cogeco is committed to transparency. The Corporation will communicate in a clear and fair manner on its environmental, social and governance performance. It will produce a periodic CSR report and will provide information on its CSR performance to external sustainability evaluators. The most relevant topics that the Corporation reports on are assessed on a periodic basis, taking into consideration its stakeholders’ feedback, among other sources.

### 6.0. Related Policies and Procedures

- Cogeco Code of Ethics
- Supplier Code of Conduct
- Policy on a Harassment, Discrimination and Violence-free Workplace
- Cogeco Policy for Granting Donations and Sponsorships
- Communication Policy
- Procurement Policy
- Employee Privacy and Confidentiality Policy
- Information and Cyber-Security Policy

### 7.0. 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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