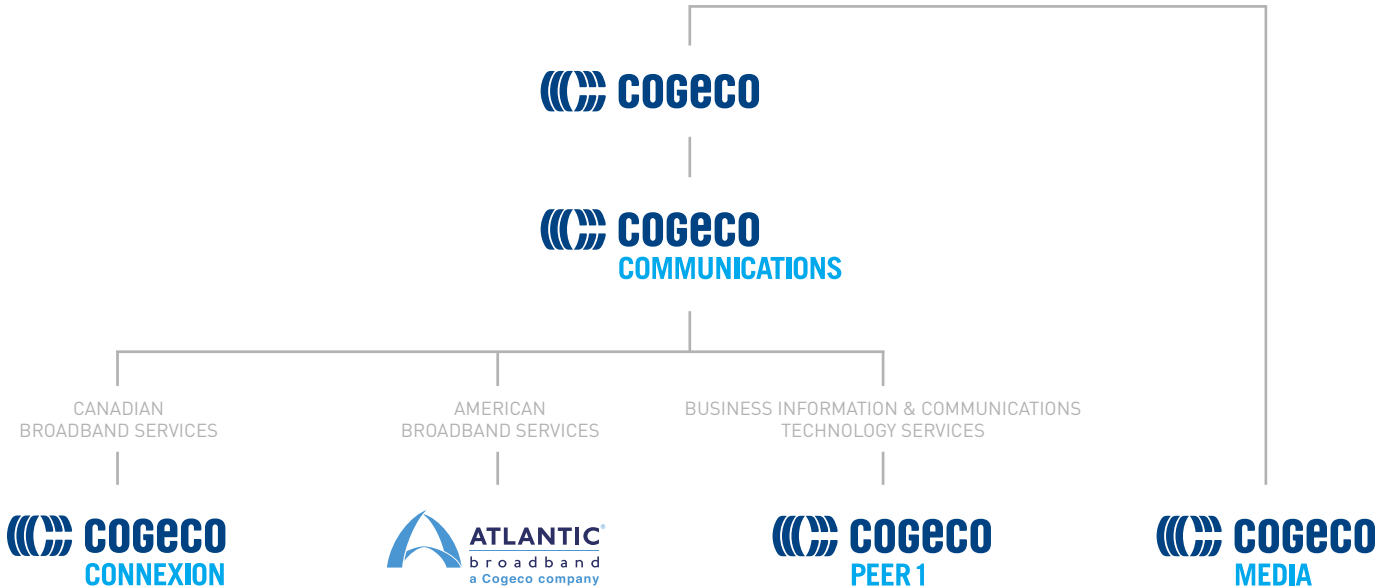


STATEMENT AGAINST SLAVERY, FORCED LABOUR AND HUMAN TRAFFICKING



BACKGROUND INFORMATION ON COGECO INC.



Cogeco Inc. is a diversified holding corporation which operates in the communications and media sectors. Its Cogeco Communications Inc. subsidiary provides residential and business customers with Internet, video and telephony services through its two-way broadband fibre networks, operating in Québec and Ontario, Canada, under the Cogeco Connexion name, and in the United States under the Atlantic Broadband brand (in 11 states along the East Coast, from Maine to Florida). Through Cogeco Peer 1, Cogeco Communications Inc. provides business customers with a suite of information technology services (colocation, network connectivity, hosting, cloud and managed services), by way of its 16 data centres, extensive FastFiber Network® and more than 50 points of presence in North America and Europe. Its Cogeco Media subsidiary owns and operates 23 radio stations with complementary radio formats and extensive coverage serving a wide range of audiences mainly across the province of Québec, as well as Cogeco News, a news agency. Cogeco's subordinate voting shares are listed on the Toronto Stock Exchange (TSX: CGO). The subordinate voting shares of Cogeco Communications Inc. are also listed on the Toronto Stock Exchange (TSX: CCA).

As at January 31, 2019, the number of employees of the Corporation totalled 5,118.

OUR COMMITMENT

According to the International Labour Organization (ILO)¹ at any given time in 2016, more than **40 million people were in modern slavery**, including 24.9 million in forced labour. Cogeco is aware of this universal problem. Accordingly, we have a zero tolerance approach towards modern slavery and human trafficking and we are committed to ensuring that the fundamental rights of our employees and of people across our supply chain are always respected.

This Statement intends to focus specifically on the issues of Slavery, Forced Labour and Human Trafficking, in order to comply with the UK Modern Slavery Act (2015).

COGECO'S SUPPLY CHAIN

Cogeco (the "Corporation"), parent-company of Cogeco Peer 1, which has facilities located in the U.K., 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 had more than 5,600 direct active suppliers in fiscal 2018, including all its subsidiaries. As a service provider, Cogeco does not manufacture any products. Our main supplier categories and the ones that represent the highest expenditure are network equipment, information technology equipment, customer premises equipment (including modems and set-top boxes), construction services and professional services. Our suppliers do not change on a seasonal basis.

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. **The Corporation has developed policies and mechanisms to engage in business with suppliers that demonstrate a strong commitment to sustainability and ethical behaviour.**



**COGECO
DEMONSTRATES
STRONG COMMITMENT
TO SUSTAINABILITY
AND ETHICAL
BEHAVIOUR.**

¹ International Labour Organization (ILO) [official website](#).

COGECO'S POLICIES

Cogeco has implemented a Corporate Social Responsibility (CSR) Policy which is designed to support the conduct of all its operations in a productive and sustainable manner.

In addition, 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 highlighted in the Code of Ethics.

The Corporation has also developed a Supplier Code of Conduct, which has been progressively implemented since fiscal 2016. 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 Responsible Business Alliance (RBA) Code of Conduct – although we are not members of the RBA. 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. The Code covers Cogeco's stance on aspects such as **Humane Treatment, Non-Discrimination, Forced or Compulsory Labour, Child Labour, Equal Remuneration, Reasonable Working Hours and Fair Wages and Benefits**. The Supplier Code of Conduct is reviewed on a periodic basis, not exceeding every five years, in order to ensure it remains current and relevant and integrates new and evolving issues pertaining to our supply chain.



**COGECO'S SUPPLIER
CODE OF CONDUCT
UPHOLDS HUMAN RIGHTS
FOR ALL PEOPLE.**

With regards to Forced and Compulsory Labour, the Supplier Code of Conduct clearly stipulates that:

"It is prohibited to hold an employee in servitude or in slavery and to take part in human trafficking. They 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 bound by a debt to the employer or to a third party."

With regards to Child Labour, our Code clearly stipulates that:

"Suppliers are forbidden to use child labour in any stage of manufacturing. The term "child" is defined as someone who would be under the age of 15, or under the age of compulsory education, or under the minimum legal age of employment, whichever is higher. Furthermore, no hazardous work should be performed by employees under 18 years of age."

Lastly, Cogeco's Procurement Policy states that if all parameters of the acquisition of goods and services are equivalent, it will favour suppliers whose vision/processes/procedures are in compliance with Cogeco's CSR policy, Supplier Code of Conduct and Code of Ethics.

DUE DILIGENCE PROCESS AND PERFORMANCE MONITORING

At Cogeco Connexion, our largest subsidiary representing about 50% of our workforce and revenues, suppliers' social standards are evaluated through a checklist that we ask them to complete during Request for Proposal (RFP) processes. Responses to the CSR checklist questions are evaluated based on their relevance and account for a total between 5% to 10% of the total points associated to RFPs. The CSR checklist will soon apply to all subsidiaries of Cogeco.

In addition, all new suppliers of Cogeco are expected to acknowledge Cogeco's Supplier Code of Conduct. Cogeco is working to make sure that all top suppliers either acknowledge its Supplier Code of Conduct or Cogeco reviews and approves their CSR standards.

Cogeco reserves the right to review or assess suppliers' adherence to the Code. Suppliers are expected to promptly respond to requests for information from Cogeco regarding matters covered by this Code. These may include surveys, questionnaires, requests for supporting documentation and other measures intended to increase visibility into our supply chain. 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.

In 2018, we reviewed our approach to defining the top suppliers from a CSR perspective; we defined top suppliers according to the spent and the potential social and environmental risks of their activities. We created a new list of top suppliers and we are working towards meeting the goal of having our Code acknowledged by all top suppliers by 2020.

Not only does the Corporation have a Vice President, Internal Audit & Risk Management in charge of ethics, but the Corporate Governance Committee of the Board of Directors also monitors compliance with the Code of Ethics.

As communicated in our Supplier Code of Conduct, as well as in our Code of Ethics, anyone who witnesses a situation of non-compliance to the Supplier Code of Conduct can report said situation 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. To date, we have never received a report regarding a situation of non-adherence to the Supplier Code of Conduct involving one of Cogeco's suppliers.

52% OF OUR TOP SUPPLIERS HAVE ACKNOWLEDGED OUR SUPPLIER CODE OF CONDUCT, AS OF FEBRUARY 2019.

0 MODERN SLAVERY OR HUMAN TRAFFICKING REPORTS TO THE ETHICS LINE.

73% OF EMPLOYEES* FEEL COMFORTABLE USING THE MECHANISM IN PLACE TO REPORT A VIOLATION TO THE CODE OF ETHICS.

***IN FISCAL 2017**

Furthermore, through Cogeco's employee engagement survey, we measure our employees' opinion on how at ease they are to report ethical violations. We strive continually to improve this result.

Finally, Cogeco also has formal online training on its Code of Ethics, which is mandatory for all new employees and Board members and must be completed every two years subsequently. Moreover, all employees must acknowledge the Code in writing at the time of hiring and on an annual basis thereafter.

95% OF NEW EMPLOYEES COMPLETED THEIR CODE OF ETHICS TRAINING IN 2018.

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.

FUTURE-DRIVEN

In our constant endeavor to further improve our processes to avoid any form of modern slavery and human trafficking, we intend to carry out the following activities during our next operating period:

- Continue to concentrate our efforts on communicating the Supplier Code of Conduct to our top direct suppliers to achieve the 2020 objective;
- Update the Procurement Policy, reinforcing our commitment to avoiding modern slavery and human trafficking in our supply chain;
- Update the RFP checklist and define processes for implementing the RFP CSR checklist across all subsidiaries;
- Update the Code of Ethics, reinforcing our commitment to respect human rights;
- In our effort to assess and identify the risk of forced labour and human trafficking in our supply chain, we will initiate a risk assessment based on the geographical location of the most important suppliers of Cogeco Connexion and we will perform on-site audits;
- Implement a social media monitoring tool to track the social performance of Cogeco's top suppliers;
- Keep track of the trends and dynamics of this evolving issue.

PHILIPPE JETTÉ
President and Chief Executive Officer
Cogeco Inc. and Cogeco Communications Inc.

LINKS TO RELATED CORPORATE DOCUMENTS:

- [Code of Ethics](#)
- [Supplier Code of Conduct](#)
- [Corporate Social Responsibility Policy](#)
- [Corporate Social Responsibility Report](#)