

ETHICAL ADVERTISING POLICY

Subject: ETHICAL ADVERTISING	Sector: Enterprise Strategy & Sustainability	
	Date: June 20, 2022.	

1.0. Purpose and Mission

This Policy sets out Cogeco's approach towards ethical advertising.

Many of the principles 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.

2.0. Scope

This Ethical Advertising Policy applies to all employees of Cogeco Inc. and all its business units (referred to as "Cogeco", the "Corporation" or "we").

3.0. Principles

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

1. Be a Trusted and Reliable Partner for our Customers Through Clear Advertising

Our social purpose, "Enrich people's lives through human connection and vibrant communities", puts the customer at the center of our strategies, priorities and daily operations. We strive to be our customers' trusted and reliable partner by maintaining respectful and transparent relationships with them through excellent customer service and fair and truthful advertising of our products and services.

2. Protect Vulnerable Populations

We commit to protecting vulnerable populations by not using manipulative or deceptive marketing tactics.

3. <u>Honesty and transparency as it relates to advertising our social and environmental impacts</u>

We care for the environment and the communities where we live and work and therefore strive to conduct business in an environmentally and socially responsible manner. We commit to being fully honest and transparent about the social and environmental impacts of our work in our advertising as well as through other channels such as the publication of our annual Environmental, Social and Governance (ESG) and Sustainability report.

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4. Be a Fair Competitor

As we strive to outperform our competition, we will do so honestly, openly, fairly and with integrity. We commit to not disparage competitors or make misleading or inaccurate comparisons with competitors' products or services.

5. Act in Conformity with Applicable Laws

All of our advertising practices shall be in compliance with applicable advertising, consumer protection and competition laws and regulations in the jurisdictions where we operate.

4.0. Related Policies and Procedures

- Cogeco Code of Ethics
- Cogeco Corporate Social Responsibility Policy

5.0. 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 three years.

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