

Title: SOCIAL MEDIA POLICY  
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## SOCIAL MEDIA POLICY

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<b>Approved by:</b>	Board of Directors of Transcontinental Inc.	2013-12-05

	Date of issue:	Summary of Changes
<b>Version 1</b>	2010-12-08	Initial issue of Policy
<b>Version 2</b>	2013-12-05	Updated Policy to reflect growing use of social media by employees. Added sections on professional and personal use. Noted compliance to other interrelated TC Transcontinental policies.

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## 1. Objective and Scope

### 1.1. Objective

The purpose of this Policy is to set out the principles and guidelines which employees (“you”) of Transcontinental Inc., its subsidiaries and other controlled entities (“TC Transcontinental”) are expected to follow when using social media sites (see definition below) both when they are acting on behalf of TC Transcontinental and when they are personally responding to topics related to TC Transcontinental, its subsidiaries and its brands. This Policy should be used in conjunction with TC Transcontinental's Code of Conduct (previously known as the Code of Ethics), Corporate Disclosure Policy and Information Security Policy.

This Policy does not replace any previous guidelines regarding acceptable Internet use; it is meant as a guide to acceptable use of social media sites. Guidelines for acceptable use are included in Section 9 “Reference Documents”.

### 1.2. Scope

Social media has great potential to add value to your relationships with your colleagues, peer groups, customers and consumers. Comments on TC Transcontinental blogs as well as conversations on its social media accounts are valued and appreciated. Used appropriately, blogs and social media channels are factors of growth and progress. They also represent potential for misuse which may result in damage to TC Transcontinental and its brands. For this reason, the Corporation has chosen to provide guidance to employees regarding use of social media sites both when they are acting on behalf of TC Transcontinental and when they are personally engaged in topics related to TC Transcontinental, its subsidiaries and its brands.

This Policy is designed to help you engage in an appropriate manner with the diverse audiences of social media, protect TC Transcontinental's reputation and uphold its values when using social media in either a professional or personal context and be most effective in social networking exchanges.

### 1.3. Applies to who

This Policy extends to all directors, officers and employees of TC Transcontinental. It also applies to suppliers and those authorized to speak on TC Transcontinental's behalf, including blog creators or other contributors to TC Transcontinental's social media properties or otherwise.

## 2. Definitions, Abbreviations and Acronyms

Terms	Definitions
Corporation or TC Transcontinental	Transcontinental Inc., its subsidiaries and the legal entities they control.
Social media sites	Includes TC Transcontinental and other social media sites (e.g. Facebook, LinkedIn, Foursquare), micro-blogging sites (e.g. Twitter), blogs (including TC Transcontinental blogs and personal blogs as well as comments on blogs), video and photo-sharing websites (e.g. Instagram, Pinterest, Flickr, YouTube), forums and discussion boards and online encyclopedias (e.g. Wikipedia).
User	Any external party interacting on TC Transcontinental's social media sites including, among others, consumers of the Corporation's products and services.

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### 3. Roles and Responsibilities

Role	Responsibilities
All employees	<ul style="list-style-type: none"> <li>• Read and comply with the Social Media Policy.</li> </ul>
Corporate Communications Department	<ul style="list-style-type: none"> <li>• Provide direction to employees when there are questions regarding acceptable use.</li> <li>• Reserve the right to intervene in employee-initiated problematic situations or remove information or videos which could pose a threat to TC Transcontinental's reputation or the services it renders.</li> </ul>
Legal Department and Human Resources Department	<ul style="list-style-type: none"> <li>• Reserve the right to review employee conduct and take disciplinary action if the Policy is not respected.</li> </ul>
Sector Manager of Social Media	<ul style="list-style-type: none"> <li>• Prohibit unpaid advertising of non-TC Transcontinental related products or services by employees or third parties on TC Transcontinental's social media sites.</li> <li>• Reserve the right to distribute content posted by users on its social media sites.</li> <li>• Remove defamatory or offensive content in any form from its sites without prior notice.</li> </ul>

### 4. General Guidelines for Acceptable Use of Social Media

These guidelines represent the broader social media guiding principles expected to be followed by all TC Transcontinental employees.

#### 4.1. Comply with policies, standards and Code of Conduct

Employees at all levels are expected to comply with established Corporate policies, standards and Code of Conduct. You have a personal responsibility to be familiar with all aspects of this Social Media Policy as well as those facets of the Policy that apply to the scope of your role within TC Transcontinental. The same corporate rules, guidelines and values apply online as they do elsewhere.

#### 4.2. Use sound judgment

Your behaviour online should reflect good judgment and discipline. Anything you post has the potential to be viewed by anyone, and – regardless of your intent – your comments could be misinterpreted by competitors, suppliers, customers, other employees, and/or government regulators. Once it has been put on the Internet or on a social media platform, information travels quickly; it becomes virtually impossible to entirely delete your content.

#### 4.3. Act responsibly

Leverage social media in a responsible way. Social media has great potential to add value in relationships with colleagues, peer groups, customers and consumers. You are responsible for your actions. Take full responsibility for your comments and postings.

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#### 4.4. Use appropriate disclaimers

Do not represent yourself or TC Transcontinental in a false or misleading way.

When posting material related to TC Transcontinental or any one of its brands or businesses for professional purposes on social media, use disclaimers to state your affiliation or relationship. When talking about the Corporation during your personal use of social media, be clear that you are not speaking as a TC Transcontinental representative. Such disclosures also apply to material posted by any third party who is representing TC Transcontinental online.

Be mindful that any opinions or personal information you disclose might be linked to TC Transcontinental's name. If necessary, and when possible, use a disclaimer in your profile such as "these are my personal views and not those of the Corporation" when expressing your opinion.

#### 4.5. Respect intellectual property rights

Ensure that you have obtained the required permission to use employee or third party intellectual property rights, including trademarks, copyrights, photos/videos, patents and rights of publicity and all other rights regarding content online. Always give credit to the author or creator of material posted.

#### 4.6. Protect individual privacy

Verify that any collection or use of personal data on social media conforms to the law and TC Transcontinental's privacy policies. This includes the method in which TC Transcontinental obtains, stores, shares, uses, and provides access to personal data.

#### 4.7. Take responsibility for third parties

Assume responsibility for third parties you influence or engage with. As a TC Transcontinental employee you are ultimately responsible for full Policy compliance by third parties that fall within your job responsibilities (e.g., suppliers, agencies and others who act on TC Transcontinental's behalf).

#### 4.8. Protect confidential and proprietary information

Ensure that you have express permission to reference colleagues, clients, customers or partners unless this information in its entirety has already been made public (i.e. through a press release or a marketing campaign).

### 5. Guidelines for Use of Social Media by Employees for Professional Purposes

The following standards and procedures must be followed by employees and third parties who have social media within the scope of their job responsibilities at or for TC Transcontinental. Please refer to Section 4 of this Policy for general guidelines for acceptable use of social media.

In addition, the Corporation chooses to allow each Sector and their respective business groups to determine how they will leverage social media for professional purposes, including marketing and promotional activities, as well as news dissemination, while complying with the Corporate Disclosure Policy. Employees must review and comply with the Corporation's policies and laws that apply to their job-specific use of social media.

#### 5.1. Adhere to a documented compliance plan

Every existing or future TC Transcontinental-sponsored social media presence (i.e. new Facebook page, blog, etc.), including on third party sites, must have a documented plan and procedure to ensure compliance on an ongoing basis with the Social Media Policy.

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5.1.1. Have a designated owner

Every TC Transcontinental-sponsored social media presence must have a designated owner (e.g., community manager, etc.) knowledgeable about his or her roles and responsibilities.

5.1.2. Obtain approval for new web presence

You must obtain approval from your immediate superior and any other relevant parties before creating a new TC Transcontinental web presence. Any new type of internal social media presence or any new external TC Transcontinental-sponsored site must be reviewed by the Sector's Manager of Social Media or the Corporate Communications Department.

5.1.2.1. Recognize TC Transcontinental intellectual property

Social media accounts that you register for TC Transcontinental business and any accounts you register that contain TC Transcontinental names (or domain name tc.tc.) and brands are considered TC Transcontinental intellectual property.

5.1.2.2. Use full brand name

As a best practice, if you create an account on behalf of a TC Transcontinental brand, you must be a good representative of the Corporation and respect the brand equity by using the complete, appropriate name of the brand as opposed to an abbreviation. Never include your personal name in a brand's alias. If in doubt, consult the Legal Department.

5.1.2.3. Choose an appropriate alias

You must not use another company's name, product names or trademarks for a social media account name. This potentially poses a legal risk for the Corporation. If in doubt, consult the Legal Department.

5.1.3. Review user-generated content initiatives with Legal

A TC Transcontinental-sponsored social media presence which will allow consumers or external stakeholders to post photos or other user-generated content (i.e. for a contest) must get prior review from the Legal Department.

5.1.4. Manage passwords

5.1.4.1. Centralize account password management

Username and passwords for TC Transcontinental social media accounts must be centrally managed and documented by the Sector's Manager of Social Media or the Corporate Communications Department. This is intended to facilitate access to the login information in the event of employee transitions. The Sector's Manager of Social Media will oversee login information for new account creation as well as changes to existing accounts.

5.1.4.2. Use a different password for internal/external sites

Do not use TC Transcontinental passwords as your social media passwords. The password for your TC Transcontinental intranet/email account must remain confidential. When using your TC Transcontinental email address in social media sites as part of your job responsibilities, never use the same password for your TC Transcontinental intranet/email account and the external social media site to which you are posting materials.

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## 5.2. Personal accounts used for professional purposes

TC Transcontinental journalists, editors and content creators can use their personal social network accounts as a tool to promote their work and/or the TC Transcontinental brand they work for.

You are required to adhere to the guidelines of the Corporate Disclosure and Social Media policies when you identify yourself as an employee of TC Transcontinental in your personal account profile.

When choosing your alias, use your name or surname, or any alias you desire. Do not include TC Transcontinental's name or any brand's name in your alias. Your personal name should never be tied to the brand you are working for in an alias (e.g. @andre\_coupdepouce, Julie\_Publisac, @AnneSmith\_StyleatHome are not acceptable aliases).

## 5.3. Interacting with social media users

Employees are encouraged to respond to questions about their areas of expertise directed their way on social media, as long as their answers are in accordance with TC Transcontinental's Code of Conduct, Social Media Policy and Corporate Disclosure Policy. In case of doubt, please contact the Corporate Communications Department

Be aware that any response you give to a reader or viewer could be publicly disseminated. Email, Facebook messages and Twitter direct messages may seem like one-on-one conversations, but could end up on external blogs and a host of other media outlets.

The following high-level principles should guide how our employees (i.e. community manager) or third parties represent TC Transcontinental in an online, official capacity when they are speaking "on behalf of the Corporation", whether they are using an official TC Transcontinental social media account or their own personal account for professional purposes.

### 5.3.1. Be accurate and honest

Ensure that your content is totally accurate and not misleading.

### 5.3.2. Disclose your affiliation

Clearly state your affiliation with the Corporation in your posts, blogs, etc. This also applies to bloggers and other outside parties sponsored by TC Transcontinental.

### 5.3.3. Represent the Corporation mindfully

Consistently demonstrate respect towards others. Treat all individuals, ethnicities, cultures and religions respectfully. Do not use or repeat inflammatory words and always give careful thought to your reply before responding to negative comments.

### 5.3.4. Do not reveal competitive, confidential, or non-public information

Do not post financial information or proprietary information about TC Transcontinental or your projects. Familiarize yourself with the IT security parameters relating to the information you possess, as described in the Information Security Policy.

### 5.3.5. Do not post official information

You should not post any official information (i.e. a press release) about TC Transcontinental unless you have approval from official spokespeople.

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5.3.6. Do not post defamatory or false content

You should not post anything that is defamatory, abusive, maliciously false contrary to public order. You should not post social media content about TC Transcontinental or individuals that violates the Corporation's policies against hostility, harassment or discrimination.

5.3.7. Do not slander TC Transcontinental or competitors

You must not disparage TC Transcontinental or any of its brands and services or the products or services of its customers, suppliers or competitors.

5.3.8. Do not discuss TC Transcontinental with media or analysts

Please refer to the Corporate Disclosure Policy.

5.3.9. Do not repurpose internal content

TC Transcontinental does not permit repurposing content from the Corporate intranet (<http://intranet.transcontinental.ca>), any internal memorandum or internal letter in any public forum. Do not attempt to post information about the Corporation that appears to readers to be formally sponsored by TC Transcontinental. If an employee chooses to share content from the Corporation's website ([www.tc.tc](http://www.tc.tc)), only a link should be provided to the original content.

5.3.10. Avoid angry exchanges

Avoid situations of protracted exchanges with irate social media participants that become increasingly unconstructive and contrary to public order. Corporate Communications must be immediately alerted of obscene, abusive, and/or racist language on TC Transcontinental social media sites.

5.3.11. Refrain from expressing views on controversial issues

TC Transcontinental employees, specifically but not limited to reporters, editors and content creators, must be aware that the personal opinions they express may damage the reputation of TC Transcontinental or its brands as unbiased sources of news, information and content. Refrain from expressing personal opinions on controversial topics and contentious public issues. Refrain from declaring your political views or political affiliations.

## 6. When to Alert Superiors or the Corporate Communications Department

Employees must contact their superior or the Corporate Communications Department in the case of:

6.1. Doubt

When there is uncertainty regarding acceptable use, including concerns or uncertainty regarding impartiality, confidentiality, conflicts of interest or commercial sensitivity;

6.2. Media contact

A journalist/member of the media contacts an employee regarding any topic related to TC Transcontinental (refer to the Corporate Disclosure Policy for more information);

6.3. Error

If there are errors about TC Transcontinental that require correction;

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#### 6.4. Relevant information

Employees are encouraged to alert their superior in the event that they come across posts, comments or any other type of social media content that could have a significantly detrimental impact on TC Transcontinental so that the Corporation may monitor the content and, if necessary, take appropriate action.

#### 6.5. Payment offers

If an employee is offered any type of payment (monetary or in kind) to contribute content to a social media site or to promote an external product or service; and

#### 6.6. Conflict of interest

Employees who already have a personal blog, microblog or website which indicates in any way that they work at TC Transcontinental should discuss any potential conflicts of interest with their superior.

### 7. Guidelines for Use of Social Media by Employees for Personal Purposes

The following guidelines apply when you engage in social media in a personal, non-professional capacity – either using a TC Transcontinental-issued device or your personal devices (computers, tablets, smartphones, etc.). In addition to benefitting the Corporation's long-term success, adhering to these guidelines may help reduce potential legal liability for you and Transcontinental Inc. Please refer to Section 5 "Guidelines for Use of Social Media by Employees for Professional Purposes" for guiding principles on the use of social media in a professional capacity.

#### 7.1. Exercise sound judgment with time spent

While use of social media sites is permitted at work, the time spent on these sites should be for professional reasons. Employees should exercise sound judgment and discipline with respect to time spent. Use of social media at work must not impede your ability to fulfill the duties and obligations of your position.

#### 7.2. Use your personal email

Use your personal email, not your TC Transcontinental email address when using social media in a personal capacity. This will facilitate account management in the event of employment transitions. If you are interacting on a site used for professional development and association (e.g., LinkedIn), you may on exception use your professional email but not the same password as you use for your TC Transcontinental intranet/email account.

Employees must not use the TC Transcontinental (or its subsidiaries or brands) name in their personal email addresses or personal social media addresses or usernames.

#### 7.3. Interact for professional use

You can use your personal social media accounts during office hours as a tool to promote your work and/or the TC Transcontinental brand you work for. Exercise sound judgment and discipline with respect to time spent on your personal accounts and always follow the principles highlighted in Section 5.

#### 7.4. Do not commit TC Transcontinental to action

Do not commit TC Transcontinental to any action unless you have the authority to do so. You should not discuss any current or prospective initiatives to be undertaken by TC Transcontinental at any level of the Corporation nor provide timelines for actions already announced if no timeline was previously disclosed.

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7.5. Do not engage with media or analysts

Please refer to the Corporate Disclosure Policy.

**8. Consequences for Policy Violation**

The Corporation does not and will not tolerate content that is illegal, obscene, defamatory, threatening, infringing on intellectual property rights, invasive of privacy or otherwise objectionable. Failure to follow these basic principles will result in the moderation and removal of the offending comments by TC Transcontinental without notice.

The Corporation reserves the right to monitor the use and content of the social media sites used by its employees as well as general Internet usage as described in the Information Security Policy and to take disciplinary action, up to and including dismissal, if it determines that an employee is not behaving in a manner consistent with established policies.

For further guidance, the Corporation's Code of Conduct, which all employees have signed, should be consulted.

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## 9. Reference Documents

DOCUMENTS	HYPERLINK
TC Transcontinental Corporate Disclosure Policy	EN <a href="http://intranet.transcontinental.ca/en/tools-resources/corporate-policies/Documents/Governance/PS-02_Corporate_Disclosure.pdf">http://intranet.transcontinental.ca/en/tools-resources/corporate-policies/Documents/Governance/PS-02_Corporate_Disclosure.pdf</a>  FR: <a href="http://intranet.transcontinental.ca/fr/outils/politiques-societe/Documents/gouvernance/PS-02_Politique_divulgateion.pdf">http://intranet.transcontinental.ca/fr/outils/politiques-societe/Documents/gouvernance/PS-02_Politique_divulgateion.pdf</a>
TC Transcontinental Code of Conduct	EN <a href="http://intranet.transcontinental.ca/en/tools-resources/corporate-policies/Documents/Governance/code_of_conduct.pdf">http://intranet.transcontinental.ca/en/tools-resources/corporate-policies/Documents/Governance/code_of_conduct.pdf</a>  FR <a href="http://intranet.transcontinental.ca/fr/outils/politiques-societe/Documents/gouvernance/code_de_conduite.pdf">http://intranet.transcontinental.ca/fr/outils/politiques-societe/Documents/gouvernance/code_de_conduite.pdf</a>
TC Transcontinental Information Security Policy	EN <a href="http://intranet.transcontinental.ca/en/tools-resources/secureite-information/Documents/TC%20Security%20Manual.pdf">http://intranet.transcontinental.ca/en/tools-resources/secureite-information/Documents/TC%20Security%20Manual.pdf</a>  FR <a href="http://intranet.transcontinental.ca/fr/outils/secureite_inform-ation/Documents/Manuel%20Sécurité%20TC.pdf">http://intranet.transcontinental.ca/fr/outils/secureite_inform-ation/Documents/Manuel%20Sécurité%20TC.pdf</a>

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