

## A. OVERVIEW:

This Social Media Policy (the “**Policy**”) is intended to provide a framework and establish both guidelines and expectations for Social Media use. The guidelines and expectations for functioning in an electronic world are the same as the values and ethics Employees are expected to live by every day whether tweeting, posting, or speaking to tenants, customers, vendors, or other Employees (collectively, “**Stakeholders**”).

Social Media can be used for a variety of purposes, and some Employees use it in both their work and personal lives. It is recommended that you keep all business and personal use separate. Your responsibility to RioCan (the “**Company**” or “**RioCan**”) does not end at the close of business each day. For this reason, this Policy outlines expectations for business use and expectations for personal use.

## B. SCOPE:

This Policy applies to all Employees, Contractors, and Consultants of RioCan.

## C. DEFINITIONS:

**Authorized Social Media User** or **Authorized User** means and includes any Employee, Contractor, Consultant, and any other RioCan Employee responsible for the use, administration, management, monitoring and/or retention of Social Media, Social Media tools or web sites, and/or Social Media content, in the name of or on behalf of RioCan.

**Consultants** - Are professionals who provide expert advice to RioCan in a particular area.

**Contractors** - Are individuals who conduct business for, or on behalf of RioCan, but are not RioCan Employees.

**Employees** - Are individuals who work for RioCan, including but not limited to full-time and part-time or temporary Employees.

**Personal Use** means and includes Social Media interaction from an individual account.

**Social Media Content** means and includes any materials, documents, photographs, graphics, and other information that is created, posted, distributed, or transmitted using Social Media internet sites or Social Media tools.

**Social Media** means and includes internet technologies that facilitate and promote interactive communication, participation, collaboration and the interactive functions they provide to users, such as, by way of example, Twitter, Facebook, Instagram or other social media platforms.

**For the purpose of this policy, we will be distinguishing between expectations for social media for business use and social media for personal use:**

#### **D. SOCIAL MEDIA FOR BUSINESS USE:**

The Company supports the appropriate use of Social Media for legitimate business use. Social Media can help RioCan staff build a positive brand image, build affinity and loyalty, collaborate, share information, and support dynamic discussions online with Stakeholders. It can also be used to provide opportunities to enhance outreach with individuals, communities, and groups in locations where RioCan operates across Canada.

When using Social Media, Employees should conduct themselves as they would in any other work situation such as a meeting, conference, or public event. The Company has developed the following guidelines to help RioCan Employees, Contractors and Consultants use Social Media appropriately and effectively.

While conducting RioCan business, Employees are reminded to adhere to our Company Code of Conduct and Ethics Policy and any other relevant policy such as the Confidentiality, Confidentiality of Material Information, Privacy, Mobile Device Acceptable Use, and Social Media policies, and disclose any affiliation(s) whenever necessary.

##### **Know That You Are On the Record:**

Communication on Social Media sites or accounts should always be considered public and permanent. Online communities are not private; your posts may be accessed by a wider audience than intended or copied by others and published elsewhere without your permission or knowledge. If you would not say or write something in a public setting, do not post it online. Employees must not post confidential or sensitive information acquired through their work, and should take care not to put themselves into a conflict of interest in online discussions – even if you are speaking from your personal perspective, it may be assumed you are speaking on behalf of the Company.

##### **Keep All Records:**

It is critical that we keep records of our interactions and the activities of those with whom we engage. As online conversations are often fleeting and immediate, it is important for you to keep track of them when you are officially representing the Company. Remember that online Company statements can be held to the same legal standards as traditional media communications.

##### **Be Clear and Purposeful in Your Communication:**

When representing RioCan, Employees should only comment and use Social Media for the intended business purpose. Only respond to news media inquiries if you are authorized to do so.

Although Social Media makes it possible to respond instantly to a question or complaint, it is a good idea to take a few minutes to formulate your comments, and to have another person read your response to reduce the chance that it will be misinterpreted.

Do not create posts or comments that are unrelated to the Social Media site’s purpose, and never post commercial content, spam, or confusing, misleading, out-of-date information or broken web links. If necessary, RioCan’s Human Resources department (“HR”) and Marketing & Communications department reserve the right and may request that you modify or remove any posts that contravene Company policies, branding, guidelines or any relevant Provincial and/or Federal legislation.

**Be Transparent and Accountable:**

When representing RioCan, Employees should disclose their true identity and affiliation with the Company. When posting online, be courteous and stick to facts. If you make a mistake, be honest and upfront about it, and try to correct it as quickly as you can in order to restore trust with your audience.

**Be Respectful of Others:**

Privacy, libel and human rights laws apply to Social Media sites and accounts as they do to other forms of communication. Do not post obscene or racist content, personal attacks, insults, threatening language, or potentially libellous statements.

Always respect copyright laws. Do not post documents, logos, photographs, graphics or other material owned by others without written permission, unless such postings fall under an exception to copyright protection.

**Be Cautious of Attachments:**

Opening attachments from unknown or unsigned sources is inappropriate. Attachments are the primary source of computer viruses and should be treated with utmost caution.

**Maintain Confidentiality and Privacy of Passwords and Access:**

Sharing Social Media account passwords with another person or attempting to obtain another person’s Social Media account password is inappropriate. Third party service providers managing Social Media accounts on behalf of RioCan must be approved in advance by Corporate IT and Corporate Marketing.

**Authorized Roles of Social Media for Business Purposes:**

With the approval of the Executive Management Team and HR, the following Company roles and departments have been authorized access to all Social Media sites on behalf of RioCan for legitimate business purposes:

HR Role	Asset Mgmt	Acctg	Corp Fin & Rptg	Construction	Development	Executive	HR	IT	Int. Audit	Investments	Leasing	Lease Admin	Legal	Marketing	Operations
Executive						X									
Senior Vice President	X		X	X	X	X				X	X		X		X
Vice President	X	X	X	X	X		X	X		X	X	X	X	X	X
Assistant Vice President	X	X	X	X	X		X	X	X	X	X	X			X
Senior Director/Director							X	X						X	
Senior Manager								X							
Manager	X							X						X	
Generalist							X								
Engineer								X							
Assistant						X		X						X	
Coordinator							X							X	
Administrator							X	X			X	X			
Clerk													X		
Analyst								X							

**Becoming an Authorized Social Media User:**

A Manager may designate one or more Employees to be an Authorized User for a Company department or a specific property. To become an Authorized User, the Manager is to complete the Online Information Technology (IT) Service Request Form and forward it to the HR Department. HR will then approve and forward the authorized form to the IT Service Desk. No Authorized Use" permissions will be granted unless approved by HR. If not approved by HR, an email will be sent from HR to the Manager with an explanation as to the reason access was denied.

**Social Media Contests:**

If a contest is being conducting through Social Media by an Authorized User (RioCan employee or approved Third party service provider), it must follow and include [RioCan's Standard Rules and Regulations](#).

**The next section outlines expectations of social media for personal use:****E. SOCIAL MEDIA FOR PERSONAL USE:**

In addition to using Social Media for business use, Employees, in their private capacity as an ordinary citizen, may want to use Social Media to share information and communicate with friends, family and co-workers. Even though you are using Social Media for personal use, Company policies apply to the use of Social Media by Employees when they are off-duty, and there is no expectation of privacy. For a complete list of Company policies, please visit the RioCan Intranet site or speak to HR for further clarification on a Company Policy.

Employees who use Social Media for personal use should consider the following:

- Even if you do not explicitly identify yourself as a RioCan Employee, others may identify you as a Company Employee by your name, your place of work, a photograph, or by the content you post.
- Identifiable RioCan Employees should make it clear that their position does not officially represent the Company's position. Use phrases such as "in my personal opinion" or "Personally..." to communicate that you are expressing your personal views.
- Do not use visual cues that suggest you represent the Company. Do not post Company-owned logos, photographs, graphics or other media without the Company's authorization.
- Do not place yourself in a conflict of interest, including revealing confidential or privileged Company information, as described in the RioCan Conflict of Interest Policy.
- Do not reveal anyone's personal, identifiable information (PII) gained through work, such as vendor, Employee or other Stakeholder information, as described under the Company's Privacy Policy.
- Do not identify or comment about other Company Employees without their consent.
- Employees must always abide by the Company Code of Business Conduct and Ethics Policy, and all other Policies that govern Employee behaviour.

- Do not post material that could be damaging to the Company’s industry, peers, tenants, or customers.

**When in doubt, do not post!** Employees should always exercise sound judgment and common sense. Once information is published online, it is essentially part of a permanent record, even if you edit or “remove/delete” it later or attempt to make it anonymous. The way that you answer an online question might be accurate in some parts of the world, but inaccurate (or even illegal) in others. Keep a “world view” in mind when you are participating in online conversations. Social Media can sometimes be a complex communication medium; what may be seen as a harmless remark could cause damage to the Company’s reputation. It is important that Employees are aware of the implications of engaging in Social Media and online conversations that reference the Company, its brands, its business, or otherwise, and that Employees recognize the Company might be held responsible for their behavior.

**Use of Personal Devices and Social Media at Work**

Employees must maintain reasonable boundaries for personal device and Social Media use during work hours. Employees are encouraged to use common sense with when and how they are using personal devices and Social Media at work.

**Company Mobile Devices and Personal Use**

Company mobile devices are a privilege, not a right. They are not personal devices. When using a Company mobile device, the main purpose is always business use. Employees are encouraged to maintain reasonable boundaries at all times when using a Company mobile device, and must remember that there is no expectation of privacy on a Company mobile device.

**F. NON-COMPLIANCE:**

Violations of this Policy will be treated like other allegations of wrongdoing at RioCan. Allegations of misconduct will be adjudicated according to established procedures. Sanctions for non-compliance may include, but are not limited to, one or more of the following:

- Temporary or permanent revocation of access to some or all computing and networking resources and facilities;
- Disciplinary action according to applicable RioCan policies;
- Termination of employment; and/or
- Legal action according to applicable laws and contractual agreements.

**Version History:**

Version	Date	Author(s)	Description
1.0	TBD	TBD	Initial Release
2.0	TBD	TBD	

<b>3.0</b>	TBD	TBD	
<b>3.1</b>	03/29/18	TBD	Updates to authorized users of Social Media for business use.
<b>4.0</b>	05/28/19	Mallory Margel	Updates to include policy and procedures around the use of Social Media for business and personal use.