



SOCIAL MEDIA POLICY

Issued by: Human Resources
Effective: March 7, 2018
Scope: **Applicable to all Employees (Canada & U.S.)**

1.0 Objective

The objective of this Policy is to ensure that employees understand their obligations with respect to the use of Social Media.

2.0 Definitions

- 2.1. **Confidential Information:** means any information about the Company, or its customers and suppliers, that is not publically available without breach of any agreement or Company policy, including, without limitation: commercial, technical, financial, legal, and operational information.
- 2.2. **Marketing & Communications:** means the Marketing and Communications team of CP's Public Affairs and Communications Department.
- 2.3. **Media Relations:** means the Media Relations team of CP's Public Affairs and Communications Department.
- 2.4. **Social Media:** means websites, blogs, social networking sites, or other applications that enable users to create and share content online.

3.0 Policy Statement

- 3.1. **Official CP Social Media Presence:** Only employees authorized by Media Relations are permitted to establish a Social Media presence on behalf of the Company or to express an official Company position on Social Media, including but not limited to: Facebook and Twitter. Employees are free to share content delivered directly by CP's corporate Social Media accounts for that purpose.
- 3.2. **Acting as a Representative of CP:** Employees are prohibited from acting as a representative of CP on Social Media without written consent from Media Relations. If there is any potential that an employee using Social Media could be identified as a CP employee, the employee must make it clear that the views expressed by the employee do not represent the Company. CP recommends using a disclaimer such as: "The postings on this site are my own and do not reflect the views of Canadian Pacific". Posting of such a disclaimer does not, however, take away from the other obligations of an employee under this Policy.

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- 3.3. **Prohibited Content:** Employees using Social Media are prohibited from posting or sharing any content that could have a detrimental impact on the business, image or reputation of CP, or any of its management, staff, customers or suppliers, or that otherwise contravenes applicable Company policies and procedures, including: CP’s Code of Business Ethics, its Discrimination and Harassment Policy, and its Internet and Email Policy.
- 3.4. **Disclosure of Confidential Information:** Employees are prohibited from disclosing Confidential Information on Social Media without prior approval from Media Relations.
- 3.5. **Disclosure of Personal Information:** Employees are prohibited from disclosing the personal information of other CP employees, management, contractors, customers, or suppliers, to Media Outlets without their written consent, and that of CP where applicable.
- 3.6. **Photographs, Video and Audio:** Employees are prohibited from posting, sharing, selling or otherwise distributing on Social Media, any photographs, videos or audio recordings taken of, or on, CP property, or otherwise connected to CP, that could reasonably be expected to have a detrimental impact on CP’s business, image or reputation. Further, employees must obtain approval from Media Relations prior to posting, sharing, selling, or otherwise distributing on Social Media any photographs, videos, or audio recordings they have taken of CP’s operating environment.
- 3.7 **Business Use of Social Media:** Employees must obtain approval from their VP and Media Relations prior to using Social Media to conduct Company business.
- 3.8 **Company Time & Property:** As more fully detailed in CP’s Internet & Email Policy, personal use of company hardware, internet, or email services that may have a negative impact on the Company or interfere with job performance is prohibited.
- 3.9 **Aliases:** Employees cannot use an alias to circumvent this Policy. This Policy applies to employees regardless of the name used on any Social Media account.
- 3.10 **Monitoring Social Media:** The Company monitors Social Media for, among other reasons, the purpose of ensuring compliance with this Policy.
- 3.11 **Reporting Violations:** Employees are expected to immediately report known or suspected violations of this Policy to their Manager, Media Relations, and/or Human Resources.

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Protected Activities

This Policy does not prohibit the making of any comments or communications protected under applicable laws/legislation. Further, nothing contained in this Policy limits the ability of an employee to provide information to, or otherwise participate in any investigation of, any federal, state, or provincial law enforcement agency, government agency, or regulatory body, upon request, or in the event that the employee believes an offence has been or is being committed under any legislation or that contravention of any legislation, regulation, rule, certification, order or emergency directive has been or is being committed that involves the Company.

4.0 Consequences

Failure to comply with this Policy and any related procedures may result in an investigation and disciplinary action up to and including termination of employment.

5.0 Additional Information

For interpretation or additional information on this policy or related procedures, please contact the Public Affairs and Communications Department.

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