



Policies and regulations

PO-008

Social Media and Image Use Policy

August 2019

Preamble

Considering that the web and social networks are now part of the daily life of most employees whether at home or at work, it is important to draw the line between personal and professional life. These new technologies are transforming the world of work and can be very interesting to propel our company into new markets and spread our prowess across the globe. These new means allow us to improve our brand image, the reputation of our company, recruit and retain our employees as well as be more attentive to our customers. Although social media is very present, it is not always surprising that employees can have difficulty drawing the line between personal and professional life. The goal of this policy is to preserve the well-being of all.

Application

This policy applies to all persons working for SIRIUSMEDx, including staff, instructors, physicians, interns, suppliers and contractors. It also applies to all posts and comments that directly or indirectly involve the organization and/or a colleague, regardless of the medium used (Facebook, LinkedIn, Instagram, YouTube...).

General objectives

- Raise awareness and provide employees and subcontractors with tools on social network use policies. This guide also ensures that everyone's privacy is respected and that the confidentiality of the company's information is protected.
- Inform employees about the terms and conditions of access and use of social networks, their responsibilities with respect to them and the related sanctions.

Definitions

Facebook: Social network that allows users to post content and exchange messages.

Twitter: A social networking site that allows users to send small messages (less than 140 characters) while attaching links to articles, videos, photos, etc.

LinkedIn: Social platform that allows you to share your resume and build a network of contacts.

YouTube: Website that offers users the ability to post, view and share videos.

Instagram: Social platform for sharing photos and videos.

Laws and regulations

Use of social media must be in compliance with applicable laws and regulations, including these sections:

- Civil Code of Quebec (for Quebec);
- Common Law (for other Canadian provinces and territories);
- Criminal Code;
- Charter of Human Rights and Freedoms;
- Charter of the French language;
- An Act respecting the protection of personal information in the private sector;

The following legislation is not intended to be an exhaustive list of applicable provisions.

Civil Code of Quebec

Art. 35 "Everyone has the right to respect for his reputation and privacy."

"No person's privacy shall be invaded without that person's consent or without authorization by law."

Art. 2088 "The employee, in addition to being required to perform his work with prudence and diligence, must act with loyalty and honesty and not make use of information of a confidential nature that he obtains in the performance or on the occasion of his work."

"These obligations survive for a reasonable time after termination of the contract, and survive at all times when the information refers to the reputation and privacy of others."

Art. 2100 "The contractor and the provider of services are bound to act in the best interests of their client, with prudence and diligence. They are also bound, according to the nature of the work to be done or the service to be provided, to act in accordance with the users and rules of their art, and to ensure, where applicable, that the work done or the service provided is in conformity with the contract."

Common Law

Outside the province of Quebec, the Common Law applies to all publications or messages transmitted via social media.

Quebec Charter of Human Rights and Freedoms

Art. 5 "Everyone has the right to privacy."

Private Sector Privacy Act

S. 10 "Every person carrying on a business shall take appropriate security measures to protect personal information that is collected, used, disclosed, retained or destroyed, taking into account, among other things, the sensitivity of the information, the purpose for which it is to be used, the amount, distribution and format of the information."

Criminal Code

Art. 298 "A defamatory libel consists of a matter published without justification or legitimate excuse and of such a nature as to harm the reputation of someone by exposing him to hatred, contempt or ridicule, or intended to outrage the person against whom it is published."

S. 300 "Every one who publishes a libel which he knows to be false is guilty of an indictable offence and liable to imprisonment for a term not exceeding five years."

S. 301 "Every person who publishes a libel is guilty of an indictable offence and liable to imprisonment for a term not exceeding two years."

Charter of the French language

Art. 58 "Public signs and commercial advertising must be in French.

They may also be made in both French and another language, provided that French is clearly predominant. [...] »

Guidelines

Expected behaviors at all times

- ✓ Act with loyalty to the organization when feedback is provided.
- ✓ Adhere to the company's core values. This must be reflected at all times when using social media.
- ✓ Be ethically responsible and professional when an employee expresses themselves on social networks.
- ✓ Do not post anything that could damage the reputation of a colleague or the organization.
- ✓ Use social media and a cell phone for personal use only on breaks or outside of work hours whenever possible.
- ✓ Respect the privacy of others. Always ask your colleague's opinion if a photo or recording of him or her is public. The same applies to photos or recordings of clients, suppliers or partners.

Appropriate and inappropriate uses of social media

- ✓ Write all personal comments or opinions in the "I" tense in order to remove the company's responsibility for the comments. Remain transparent and mention that the comments come from the individual and not from the company.
- ✓ Insert a disclaimer. The employee can of course mention on social networks that he works for the company, but he must indicate that he does not represent it.
- ✓ Racist, hateful, vulgar, disgraceful or abusive language is strictly prohibited.

Confidential information

- ✓ Maintain confidentiality and do not disclose any confidential information of the company, customers, suppliers and colleagues without their consent.

Publications on social networks for designated persons

- ✓ Monitoring and posting of online comments occurs during business hours only or at a time authorized by the employer.
- ✓ Ensure that the quality of the language is impeccable.
- ✓ Avoid solving a problem with a customer on the public pages of social networks, as this could cause significant damage to the company's image. Instead, direct the customer to a private message with an offer to contact them. Respond to all customers with respect and politeness.
- ✓ Accept responsibility for mistakes. The credibility of the company will be better maintained with customers.
- ✓ Protect intellectual property and respect copyrights. Cite sources where appropriate. Only publish verified and accurate content. False information could damage the company's reputation.

Measures applicable in case of non-compliance

In the event of a breach of this policy, the employer may require the employee to withdraw the comment immediately. The employer has the authority to decide whether the breach requires an apology to the individual or disciplinary action, up to and including termination of employment in some cases.

Presence of the company on social networks

Website : www.siriusmed.com

Facebook page: <https://www.facebook.com/siriusmedx/>

LinkedIn page: <https://www.linkedin.com/company/siriusmedx/>

Instagram page: <https://www.instagram.com/siriusmedx/>

Authorized Tag FR : #SIRIUSMEDx #PrevoirFormerPrendreSoin #MedecineHorsLimites

Authorized Tag EN: #SIRIUSMEDx #PlanTrainCare #MedicineBeyondLimits

How to identify the company: @SIRIUSMEDx

Use of the logo and images

Photos and personal identifications

In order to respect the provisions of the Charter of Human Rights and Freedoms as well as the provisions of the Civil Code of Quebec and the Common Law, it is important to respect the following points:

- A photograph may be taken in a public place of any person provided that the photograph does not violate the privacy, intimacy or reputation of that person. It is also forbidden to identify the person in the photo unless that person gives permission.
- Before taking a picture in a private place of an individual as well as for identification purposes, it is mandatory to have the individual sign a consent for the use of his image and name.
- Before taking a picture of a minor and for identification purposes, it is mandatory to have a consent form signed by the person with parental authority.

Company logos

It is mandatory to use the official SIRIUSMEDx company logos for any publication using the organization's image and name. In addition, publications must be made in the interest of the organization. When in doubt, it is best to contact the head office to obtain permission to publish.