

SOCIAL MEDIA POLICY

SCOPE/PURPOSE OF THIS DOCUMENT

This document reflects the current guidelines as determined by Constellation and its subsidiaries in collaboration with employees. This document is subject to modifications and amendments from time to time as required.

Constellation and its subsidiaries would like to encourage the use of Social Media by employees, customers, partners and others as it can be a valuable way to stimulate discussion, demonstrate transparency and share information regarding our company and our products.

Henceforth, “Constellation” or “Company” will represent either Constellation or any of its Brands or Business Units.

The Constellation Social Media Policy applies to:

- All blogs, wikis, forums, and social networks hosted or sponsored by Constellation
- Your personal blogs that contain postings about Constellation’s business, products, employees, customers, partners, or competitors
- Your postings about Constellation’s business, products, employees, customers, partners, or competitors on external blogs, wikis, discussion forums, or social networking sites such as LinkedIn, Twitter and Facebook
- Your participation in any audio or video related to Constellation’s business, products, employees, customers, partners, or competitors, whether you create a video to post or link to on your blog, you contribute content for a video, or you appear in a video created either by another employee or by a third party.

Even if your Social Media activities take place completely outside of work, what you say can have an influence on your ability to conduct your job responsibilities, those of your teammates, those of Constellation and its business interests.

Employees at Constellation are expected to act with integrity and diligence at all times during their employment. They are also bound by Constellation’s policies and guidelines, which govern their conduct. These require that employees exercise honesty in all business dealings relating to their employment. Failure to do so will result in discipline, up to and including termination of employment, and may result in prosecution of the Employee by legal authorities. Employees are subject to discipline up to and including termination of employment for other inappropriate actions and inactions not referenced in this policy - Please refer to Contour Employee Handbook available at our HRMS.

Guiding Principles for All Employees

There's a big difference in speaking "on behalf of Constellation" and speaking "about" Constellation. This set of principles refers to those personal or unofficial online activities where you might refer to Constellation.

1. Adhere to the Company Code of Conduct and other applicable policies.

- a. All employees and contractors are subject to the Code of Conduct and all policies, including the **Media Policy, Disclosure, Confidentiality and Insider Trading Policy and Information Systems Policy**. These policies are applicable to your business and personal activities online.
- b. You must not comment publicly on Constellation's M&A activity, including potential and pending acquisitions. This applies to potential acquisitions regardless of their status - in diligence, announced but not closed, etc.
- c. Don't discuss product upgrades, new features or future product releases. Please note that any direct communication to analysts, the financial market and/or members of the media must be conducted only by official Company representatives.
- d. Constellation encourages you to review office policies, guidelines and procedures at our On-Line Employee Centre if you have any questions. You may also contact your Manager and/or Human Resources department if you have any further questions.

2. You are responsible for your actions. Anything you post that can potentially tarnish

Constellation's image will ultimately be your responsibility. We do encourage you to participate in the online Social Media space, but urge you to do so properly, exercising sound judgment and common sense. If you feel you might have violated this purposely or in error, please contact your Manager and/or Human Resources department.

3. Be a "scout" for compliments and criticism. Even if you are not an official online spokesperson for Constellation, you are one of our most vital assets for monitoring the Social Media landscape. If you come across positive or negative remarks about Constellation or its brands online that you believe are important, consider sharing them by forwarding them to your Manager and/or Human Resources department.

4. Let the subject matter experts respond to negative posts. You may come across negative or disparaging posts about Constellation or its brands, or see third parties trying to spark negative conversations. Unless you are a certified online spokesperson, avoid the temptation to react yourself. Pass the post(s) along to our official in market spokespersons that are trained to address such comments.

5. Be conscious when mixing your business and personal lives. Online, your personal and business personas are likely to intersect. Constellation respects the free speech rights of all of its associates, but you must remember that customers, colleagues and managers often have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family, and know that information originally intended just for

friends and family can be forwarded on. Remember NEVER to disclose non-public information of Constellation (including confidential information), and be aware that taking public positions online that are counter to Constellation's interests might cause conflict.

Personal Spaces on the Web

You are free to set up any blog, space or other area within the given framework of the terms provided by the host of such spaces (e.g. Facebook, LinkedIn, Twitter, etc.). Do not post inappropriate, disrespectful comments to your blog, or post comments that are intended to embarrass Constellation, your co-workers, customers, partners or competitors. Any personal space where you identify yourself and could be associated or identified with Constellation in any way should have a clear disclaimer that it is not an official space of Constellation. This policy is to protect both the Employee and Constellation. The following basic template may be used for this purpose:

"The opinions on this Web site/blog/other are those of the author and do not represent the views, express or implied, of any past or present employer and/or organization."

Please do not use a personal account to conduct company business, nor use a company account for personal business.

It is important not to post Company content on public Web sites or Social Media spaces including photos, videos or company collateral. Please refrain from posting personal photos or information of Employees from Company events that could harm Constellation, employees or anyone associated with Constellation.

Managers and their subordinates are free to "friend" each other on social networking sites. Both managers and employees, however, should be mindful of avoiding any interactions/communications that may create a conflict of interest or that may compromise Constellation's ability to enforce its policies, especially its policies against nepotism, harassment and discrimination.

ADDITIONAL RULES OF ENGAGEMENT AS A CORPORATE SOCIAL MEDIA PUBLISHER

In addition to following the Code of Conduct and Guiding Principles:

- 1. Do not comment or engage others on non-Company Web sites or Social Media channels unless you are granted permission by Constellation's corporate marketing group.** Corporate Marketing is responsible for all internal and external corporate communications. It is important corporate marketing knows what is being posted in the event they need to get involved due to any issues that may arise from a post or comment on a third party Web site. If you do have permission, review privacy settings of the social networking site you are using. Understand that when your content is posted on a public social network, all posts and comments may be traceable. Any information that you post should be considered at risk for public disclosure, regardless of your privacy settings since your postings can be reposted elsewhere and may be viewed by people other than your intended audience.

2. **Be authentic, factual and respectful at all times Use your real identity.** Provide informed, wellsupported opinions and cite sources, if applicable. Always obtain permission if needed. Though Social Media sites are a more casual form of communication, be sure to remain professional and use a positive tone of voice. Be respectful of your colleagues, Constellation, our customers, prospects and our competitors.
3. **Avoid engaging in on-line disputes with your audience.** Don't use slurs, personal insults or obscenity, and always respect privacy concerns. Avoid language that may be considered objectionable or inflammatory. Show that you have listened and be responsive. If you disagree, respond in professional and respectful manner.
4. **Stick to your area of expertise** and provide unique, individual perspectives on what's going on at your business unit and in the world. In the event you cannot answer a question or comment, refer it to the appropriate internal contact.
5. **Post meaningful, respectful comments** - in other words, no spam and no remarks that are offtopic or offensive. Remember that some postings on the Internet can have an indefinite life and may not have the ability to be removed.
6. **Please respect our Company Privacy Policy.** Do not disclose any information from anyone covered under our Company Privacy Policy.
7. **Be aware of global implications.** Your posts can have global significance. The way that you answer an online question might be appropriate in some parts of the world, but inaccurate, inappropriate (or even illegal) in others. Keep that "world view" in mind when you are participating in online conversations. If you have a question about global relevance, please contact the appropriate Company PR Representative for guidance.

Setting up corporate spaces in Social Media channels

To create a corporate account for a Social Media channel, you must get permission from your Manager for approval. All accounts are managed from a corporate management center. This is to track accounts and not lose control of spaces once an employee leaves, or an administrator needs to access the account. Once approved, the corporate IT team will set up the appropriate account/space and access permission. We will also provide the necessary branding, verbiage and disclaimer.

I, the undersigned, have read and agree to abide by Constellation Social Media Policy, including the additional Rules of Engagement as a Social Media Publisher on behalf of Constellation.

I further understand and agree to follow this policy and that any violation of the policy may be cause to immediately terminate my employment with Constellation.

Date

Employee (Signature)

Division

Name of Employee