



SOCIAL MEDIA POLICY

Effective as of and from June 8, 2017

HARVEST ONE CANNABIS INC.

SOCIAL MEDIA POLICY

1.0 PURPOSE OF THIS POLICY

This document applies to all Harvest One Cannabis Inc. ("**Harvest**") employees who are creating or contributing to blogs, wikis or social networks, discussion forums, or any other kind of social media – whether on www.harvestone.ca or otherwise. Harvest recognizes that online collaboration platforms are fundamentally changing the way individuals and organizations communicate, and this policy is designed to offer practical guidance for responsible, constructive communications via social media channels for employees while protecting the best interests of Harvest.

This document is designed to help you:

- Communicate on social networking platforms as a Harvest employee;
- Engage appropriately with audiences online; and
- Be most effective in this up-close-and-personal, ever-changing environment.

If you have any questions please contact the CEO for guidance.

2.0 APPLICATION, SCOPE AND DISTRIBUTION OF THIS POLICY

Harvest empowers employees to use social media to facilitate collaboration and innovation. Employees **must** adhere to the policies in this document and when using social media. It is very important to avoid misusing intellectual property or disclosing any confidential or restricted information. It is important to remember that the rules for proper behaviors outside the internet also apply inside the "online" world. If you are unsure of whether to post, comment or respond on social sites, please contact the CEO for guidance.

Some policy statements included in this document may be implemented differently depending on regional, local, and geographic differences. When in doubt, you may contact the CEO for guidance.

All information contained within this document is subject to any applicable country, state and/or local laws. This policy will not be interpreted or enforced in any way that would interfere with an employee's rights under the *Canada Labour Code* or the *Ontario Employment Standards Act*.

3.0 POLICY

- (a) **When you are participating on social networking sites using your personal social media accounts, be transparent that your thoughts are your own** if discussing official Harvest business. Use your real identity—no aliases—and disclose your affiliation with Harvest. If you believe your posting might lead to any

confusion with viewers about whether you are speaking on behalf of Harvest, you should clearly and specifically state as follows:

Twitter disclaimer:

"These tweets are my own, not Harvest's."

Disclaimer for blogs sponsored by Harvest:

"Some of the individuals posting to this site, including the moderators, work for Harvest. Opinions expressed here and in any corresponding comments are the personal opinions of the original authors, not those of Harvest."

Third-party blog disclaimer:

"The opinions expressed in this blog are my own views and not those of Harvest."

- (b) **Do not commit Harvest** to any action unless you have the authority to do so.
- (c) **Do not post any business-related confidential or internal-use-only information (marked "For Internal Use Only") that you obtain or learn about as part of your job duties with Harvest.** Such information includes the following examples: information regarding the development of systems, products, processes and technology; personally identifiable information (such as telephone numbers, Social Insurance numbers, credit and debit card numbers or financial account numbers) of Harvest's employees, customers, vendors, or competitors; nonpublic financial information; marketing strategies; regulatory or licensing information; inventions not yet patented; or other business-related confidential or proprietary information.
- (d) **Respect all copyright and intellectual property laws** including those protecting music, videos, text and photographs belonging to Harvest or third parties.
- (e) **Respect financial disclosure laws. Be very careful when making statements about Harvest's financial performance, and do not make statements that in any way could violate provincial securities laws such as the disclosure of material, nonpublic information.** For example, it is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities. See the Insider Trading and Blackout Period Policy for more information.
- (f) **If you are representing yourself as a Harvest employee on social networking sites like LinkedIn, you may not provide professional references** for any current or former Harvest employee, contactor, vendor, or contingent worker on Harvest's behalf. However, you may provide a personal reference or recommendation for current or former Harvest employees, contractors, vendors, and contingent workers provided a) the statements made and information provided in the reference are factually accurate; and b) you include the following disclaimer:

"This reference is being made by me in a personal capacity. It is not intended and should not be construed as a reference from Harvest One Cannabis Inc. or any of its affiliated entities."

- (g) **Respect privacy; never ask for personal social networking passwords.** Although making a "friend" request to colleagues is permitted, a request to obtain their passwords is not. To ensure that the privacy of your personal blogs and social networking sites is preserved, do not ask employees, colleagues, or Harvest job applicants for their personal login passwords.
- (h) If you manage Harvest's (or a subsidiary company's) social media accounts for business and leave your job or the company, you must provide your Harvest manager with the login information to the social media accounts that Harvest owns prior to your departure.
- (i) **Do not post anything that is maliciously false, abusive, threatening or defamatory.** You should not post content that is defamatory, discriminatory, harassing, or in violation of Harvest's policies against discrimination, harassment, or hostility on account of age, race, religion, sex, ethnicity, nationality, disability, or other protected class, status, or characteristic. You should not unlawfully disparage Harvest products or services, or the products or services of our vendors or competitors. Examples of such conduct include offensive posts meant to intentionally harm someone's reputation and posts that could contribute to a hostile work environment on the basis of age, race, religion, sex, ethnicity, nationality, disability or other protected class, status or characteristic.
- (j) **Do not engage with the news media or industry analysts to discuss official Harvest strategy** and/or business on Harvest's behalf without CEO and Investor Relations consultation and approval. To ensure that Harvest communicates with the media in a consistent, timely, and professional manner about matters related to the company, consult the CEO before responding.
- (k) **If you see something online that alleges potentially unlawful or unethical conduct** (for example, illegal, unsafe or unethical conduct by a Harvest employee, contractor or vendor), **please immediately escalate this event to the CEO.**

4.0 ENFORCEMENT

4.1 Compliance Measurement

Compliance with Harvest policies is required. Compliance to this policy is verified through various methods, including but not limited to reports from available business tools, internal and external audits, self-assessment, and/or feedback to the policy owner.

Harvest reserves the right to modify or eliminate any or all parts of this document; you are responsible for regularly reviewing it to remain up-to-date. Violations of the provisions in this document may result in disciplinary action up to and including termination of employment. Harvest will communicate any significant changes to this document.

Noncompliance with this policy may result in potentially significant reputational and legal risk to Harvest.

4.2 Exceptions

There are no exceptions to this policy.

4.3 Noncompliance

Compliance with Harvest policies is required. Deviations or noncompliance with this policy, including attempts to circumvent the stated policy or process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary actions, up to and including termination.

5.0 DEFINITIONS

For the purposes of this Policy, "**social media**" means blogs, micro-blogs, e-newsletters, forums, chat rooms, wikis, social networks, social bookmarking services, user rating services and any other online collaboration, sharing or publishing platform, whether accessed through the web, a mobile device, text messaging, email or any other existing or emerging communications platform.

6.0 CORPORATE DISCLOSURE POLICY

This Social Media Policy should be read in conjunction with the Company's Corporate Disclosure Policy dated June 8, 2017 (as may be amended from time to time).

7.0 APPROVAL

Adopted by the board of directors of Harvest as of June 8, 2017.