



Journalistic Independence Policy

BCE
March 2021

For Internal Use

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1. POLICY OVERVIEW

1.1. Purpose

BCE is committed to upholding principles of journalistic independence. This Journalistic Independence Policy (the “Policy”) governs editorial decisions made by applicable news divisions owned by Bell, including radio, (collectively “Bell Media News”) to:

- Ensure compliance with applicable obligations under the Broadcasting Act and relevant industry codes
- Establish a framework of independence and non-interference between BCE and Bell Media News
- Outline principles for news coverage concerning BCE
- Define principles and parameters for interactions between BCE and Bell Media News
- Define the “absolute editorial privilege” of the Vice President responsible for CTV News or the Vice President responsible for Noovo News, as applicable
- Identify tools available to employees to report concerns regarding non-compliance with the Policy.

In the Policy, the term BCE collectively refers to BCE Inc., Bell Canada and their respective affiliates.

1.2 Scope

The principles outlined in this Policy apply to BCE employees in relation to all matters of Bell Media News journalistic independence.

1.3 Authority

Bell Media News is solely responsible for all news reporting decisions and for ensuring the integrity of its news operations. Compliance with the Policy is mandatory for all BCE employees.

Compliance with the Policy is mandatory. Failure to comply will be considered a breach of the Bell Code of Conduct¹ and may result in disciplinary action up to and including termination of employment.

⁽¹⁾BellNet (<http://bellnet.int.bell.ca/about-bell/code-of-business-conduct>) – Policies Under “Ethics and Legal Requirements”

2. POLICY DETAIL

2.1 The Broadcasting Act and Relevant Industry Codes

BCE is committed to upholding principles of journalistic independence and compliance with relevant obligations under applicable legislation, including provisions of the Broadcasting Act addressing journalistic independence. Additionally, Bell Media News is a member of non-governmental organizations that may issue codes/guidelines relating to journalistic independence, including the Radio Television Digital News Association of Canada (RTDNA), the Canadian Association of Broadcasters (CAB) and the Canadian Broadcast Standards Council (CBSC), an independent organization created by the CAB as a self-regulating council for private broadcasters. The Policy is intended to work alongside and support the principles of all such legislation, regulations and codes as they pertain to journalistic independence. This includes:

- CAB Code of Ethics: <http://www.cbsc.ca/codes/cab-code-of-ethics/>
- RTDNA Canada Code of Ethics: <http://www.cbsc.ca/codes/rtdna-code-of-journalistic-ethics-2011/>

2.2 Independence

An appropriate framework of independence between Bell Media News and BCE is a fundamental safeguard to ensure that news is covered in a fair, accurate, balanced and unbiased manner. Any interference, whether direct or indirect, actual or perceived, undermines the principles of news independence and can erode the credibility of Bell Media News which is critical to maintaining the trust of our viewers and listeners.

Clause five of the CAB Code of Ethics states:

“It shall be the responsibility of broadcasters to ensure that news shall be represented with accuracy and without bias. Broadcasters shall satisfy themselves that the arrangements made for obtaining news ensure this result. They shall also ensure that news broadcasts are not editorial. News shall not be selected for the purpose of furthering or hindering either side of any controversial public issue, nor shall it be formulated on the basis of the beliefs, opinions or desires of management, the editor or others engaged in its preparation or delivery”.

Article three of the RTDNA Code of Ethics states:

“...We will resist any attempts at censorship or interference, direct or indirect, which would undermine the principle of editorial independence....”.

BCE fully endorses the independence of Bell Media News and requires that all employees execute their day-to-day job responsibilities in a manner that respects this core value.

2.3 News Coverage Concerning BCE

From time to time, news stories directly or indirectly concerning BCE, or of commercial interest to BCE, will be reported by Bell Media News. The appropriate Bell Media News editorial team is solely responsible for determining how to cover any such story, with full discretion and control, and without interference. No BCE employee will take any action that will impact the standards of fairness, accuracy, balance and independence that must be applied to any such news story.

2.4 BCE Interactions with Bell Media News

In the normal course of business, representatives of BCE may offer ideas for news coverage to the Bell Media News team, as they would with any other news organization. In any such instances, BCE representatives must recognize that the material offered must be considered newsworthy and relevant to the audience by the applicable Bell Media News division's editorial team before receiving coverage. The news team will decide whether to proceed with a story, how it will be covered, and the extent of any coverage, with full and absolute discretion and control, and without direct or indirect interference in the decision making process.

At all times, the Bell Code of Business Conduct and other relevant BCE policies apply to Bell Media, including Bell Media News management and staff. As a result, in accordance with Bell's Code of Business Conduct and BCE's Disclosure Policy, BCE's communications department is responsible for addressing all queries from other media outlets regarding Bell Media and its divisions and properties, including Bell Media News. Furthermore, (i) non-public BCE information of which Bell Media News management or staff have knowledge in a capacity other than Bell Media News reporting or (ii) information in the possession of Bell Media in its capacity as an employer, must remain confidential and be treated in accordance with Bell's Code of Business Conduct and Information Management Policy.

2.5 Editorial Privilege

All news editorial decision making resides with the Bell Media News teams with absolute and final privilege belonging to, for CTV News, the Vice President responsible for CTV News and, for Noovo News, the Vice President responsible for Noovo News. The Bell Media News teams will be responsible for the development of applicable editorial and reporting policies, including news policies on attribution, sources, and disclosure of conflicts.

If at any time the Vice President responsible for CTV News or the Vice President responsible for Noovo News has any concerns about journalistic independence or compliance with the Policy that cannot be resolved through normal functional reporting channels in line with the principles of the Policy, the Vice President responsible for CTV News or the Vice President responsible for Noovo News can address said matters with BCE's Chief Executive Officer and/or the Chair of the BCE Audit Committee.

2.6 Compliance

To the extent that any BCE employee has concerns regarding compliance with the Policy, such concerns shall be communicated to the employee's immediate manager and/or to the Vice President responsible for CTV News or the Vice President responsible for Noovo News, as applicable. If such reporting does not provide the necessary level of confidentiality, or as the employee otherwise prefers, the concern can be reported through the Business Conduct Help Line or to BCE's Chief Legal Officer or equivalent position.

The anonymous Business Conduct Help Line is available 24/7 by calling 1-866-298-2942 or by visiting the Clearview website at <http://www.clearviewconnects.com/home>.

Members of the public should call Bell Canada's Complaint and Concerns Line at 1-866-317-3382 with any concerns about BCE activities.

Appendix A - POLICY OR PRACTICE DETAILS

A. Policy or Practice Details

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|---------------------------|---|
| Issuing BU | Legal and Regulatory Department |
| Policy Sponsor | Executive Vice President and Chief Legal & Regulatory Officer |
| Policy Owner | Corporate Secretary |
| Primary Contact | Assistant Corporate Secretary |
| Required Approvals | Board of Directors |
| Issue Date | June 1, 2015 |
| Effective Date | June 1, 2015 |
| Review Cycle | Annually |

B. Required Policy or Practice Management Elements Checklist

| Date | Changed by | Version | Description |
|--------------|-------------------|----------------|--------------------|
| June 1, 2015 | Mirko Bibic | V1.0 | Policy Launch |
| May 3, 2018 | Mirko Bibic | V2.0 | Review |
| March 2021 | Robert Malcolmson | V3.0 | Review |