

FIRE & FLOWER HOLDINGS CORP.

SOCIAL MEDIA AND ELECTRONIC COMMUNICATIONS POLICY

1. INTRODUCTION

- 1.1. Fire & Flower Holdings Corp. and its subsidiaries and affiliates (the “**Company**”) provides Users (as defined below) with practical guidelines for responsible, appropriate communications via Social Media and other electronic communications. As Social Media achieves wider acceptance among mainstream online users, it represents a public forum for communications by Users that must follow the same principles and guidelines that apply to all activities of Users as embodied in our Company policies. This policy is intended to protect the Company’s legitimate business interests and reputation, while defining a clear standard of personal responsibility on the part of Users in the use of Social Media and electronic communications.

2. APPLICATION OF THE POLICY

- 2.1. This policy applies to all employees, contract workers and temporary staff (“**Users**”).
- 2.2. This policy applies to all forms of Social Media and electronic communication including blogs, podcasts, discussion forums, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., Wikis), RSS (Really Simple Syndication) feeds, video sharing, and social networks. Examples of Social Media include, but are not limited to, Facebook, blogs, Instagram, RSS, YouTube, Second Life, Twitter, LinkedIn, Reddit, Flickr, etc.

3. COMMUNICATION OF THE POLICY

- 3.1. To ensure that all Users are aware of the policy, a copy of the policy will be distributed to all Users, or alternatively they will be advised that the policy is available on the Company’s website for their review. All Users will be informed whenever significant changes are made. New Users will be provided with a copy of this policy and will be educated about its importance.

4. APPROPRIATE USE OF INFORMATION TECHNOLOGY RESOURCES

- 4.1. Users are prohibited from using the Company’s business systems in any manner inconsistent with the Code of Business Conduct and Ethics. Excessive, inappropriate, or unauthorized use of Social Media, including through the Company’s business systems, is prohibited.
- 4.2. Users must ensure that they comply with laws and the respective Social Media site’s terms of use. This includes not infringing any copyright, brands, trademarks or other intellectual property laws, not defaming or libeling any person or organization and not breaching the data protection laws or the Company’s applicable policies.

5. COMPANY INFORMATION

- 5.1. In the course of employment or engagement at the Company, Users will be exposed to a variety of information, including Material Non-Public Information, Confidential Information, Personal Information, and Legally Privileged Information. Under no circumstance should this information be shared on Social Media networks or blogs. Company strategies and initiatives are proprietary and should never be discussed.
- 5.2. Do not make reference to any associates or clients of the Company without express prior written permission. Do not defame, libel or disparage the Company or its affiliates, customers, clients, licensees, business partners, suppliers, vendors or other stakeholders.

- 5.3. These confidentiality requirements continue even after employment has ended with the Company. In the event of a violation of these requirements after termination of employment, we may take action to enforce this policy, including asking the courts relief and/or monetary damages as appropriate.

6. PROFESSIONALISM AND RESPECT

- 6.1. Professional and appropriate conduct is expected of Users at all times, whether in the workplace or outside of the workplace.
- 6.2. Always respect the dignity and privacy of colleagues, customers, other the Company stakeholders and the Company competitors. Harassing, discriminatory, intimidating, offensive, abusive, threatening, menacing or hostile content communicated through blogs and other online communications is prohibited. Data related to others, including, but not limited to, personal details and images, shall only be posted with that party's consent.
- 6.3. Transparency, openness and honesty are important for social media. Each social network has its own user naming conventions. To foster transparency and instill trust, we suggest you avoid the use of aliases and use your real first and last name wherever possible. Do not use unprofessional nicknames.
- 6.4. Be mindful, your actions online reflect the Company. Never provide misleading, false or deceptive information about the Company on any social channel, forum or website. If you adopt an online profile, ensure that your profile and any content that you post are consistent with the professional image that you present to clients and colleagues.
- 6.5. Avoid posting comments about sensitive business-related topics such as the Company's performance and/or stock. Even if you make it clear that your views on such topics do not represent those of the Company, your comments could still damage the Company's reputation.

7. SPEAKING ON BEHALF OF THE COMPANY

- 7.1. Unless you have received express written authorization from the Company, you are not a spokesperson for the organization. Authorization means you have written permission from the Company to engage in Social Media channels on behalf of the Company, including responding to third-party posts that discuss the Company, its products or services.
- 7.2. When expressing personal views (unrelated to the Company, its products, services or competitors) in a public forum, a User may not represent him or herself as acting on behalf of the Company in any fashion, including using a work-related email address or using the Company name or logo.
- 7.3. Unauthorized electronic or other communications by any User, including recommendations for current or former co-workers are contrary to the Company's neutral reference policy.
- 7.4. Company product endorsements without proper identification as a User or comments on the competitors' products or services will be considered a violation of this policy.
- 7.5. Keep in mind that offers or contracts transmitted using Social Media are as legally binding on the Company as those sent on paper. Do not agree to terms, enter into contractual commitments or make representations through social media unless you have first obtained appropriate authority.

8. CONTENT OF POSTINGS

8.1. Users must ensure that their Social Media use does not adversely affect the Company or its customers. Users of Social Media are personally responsible for all content posted on Social Media sites and must remember that such postings may be widely accessed, including by unintended recipients, and that is difficult to delete once posted because it may have been copied or forwarded. Please be aware that some chat forums in Social Media sites may retain chats and/or instant messages. Do not use the Company's IT resources and communications systems for any matter that you wish to keep private and confidential from the organization. As permitted by law, the Company reserves the right to monitor, approve, withdraw, delete or require deletion of any inappropriate content found on social media channels or the World Wide Web. This policy is not intended to interfere with an employee's legally protected rights or to prohibit communications protected by local law.

9. CONSEQUENCES OF NON-COMPLIANCE WITH POLICY

9.1. Noncompliance with policies and procedures by a User may be subject to Senior Management review and possible disciplinary action up to and including dismissal. Any User suspected of committing a breach of this policy will be required to cooperate with the Company's investigation which may involve handing over relevant passwords and log-in details, where permitted by law.

10. REVIEW OF POLICY

10.1. The Board of Directors of the Company will annually review and evaluate this policy to determine whether the policy is effective in achieving its stated objectives.

11. QUERIES

11.1. If you have any questions about how this policy should be followed in a particular case, please contact the Chief Executive Officer or the Chief Financial Officer of the Company.

12. PUBLICATION OF THE POLICY ON WEBSITE

12.1. This policy will be posted on the Company's website.

Original Approval Date: February 13, 2019

Approved by: Board of Directors