

O2E BRANDS INC.

ACCESSIBILITY POLICY

INTEGRATED ACCESSIBILITY STANDARDS

STATEMENT OF COMMITMENT

O2E Brands Inc. (the “Company”) is committed to meeting the accessibility needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005. In that regard, the Company has established an accessibility policy and a multiyear accessibility plan to meet its obligations under Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the Accessibility for Ontarians with Disabilities Act, 2005.

The Company’s vision for accessibility is that people with disabilities, visible or invisible, are given the same opportunity as others to obtain and benefit from services offered by the Company. The Company’s goal is to make reasonable efforts to provide services in such a way that the key principles of independence, dignity, integration and equality of opportunity for persons with disabilities are respected.

APPLICATION

This policy applies to all employees, volunteers and agents of the Company who interact with the Company’s current and prospective employees, volunteers, agents, customers, clients, suppliers, and any other users of the Company’s services. This policy is available to the public and will be provided in an accessible format upon request.

MULTI-YEAR ACCESSIBILITY PLAN

The Company’s Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and meet its requirements under the Regulation. The Company will post the plan on its website and will provide it in an accessible format upon request. The plan will be reviewed and updated at least once every five years.

TRAINING

The Company will ensure that training is provided as required by the Regulation to all employees, and volunteers, all persons who provide goods, services or facilities on the Company’s behalf, and all persons who participate in developing the Company’s policies, on the requirements of the accessibility standards referred to in the Regulation and on the Human

Rights Code as it pertains to persons with disabilities. Training will be provided as soon as practicable. If any changes are made to this policy or the requirements, training will be provided to include those changes. The Company shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided. The Company shall ensure that others that provide goods, services or facilities on behalf of the Company have had training.

INFORMATION AND COMMUNICATIONS STANDARD

Feedback Processes

The Company will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication support upon request. The Company will notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

The Company will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities in accordance with the Regulation as follows:

1. In a timely manner that takes into account the person's accessibility needs due to a disability;
2. At a cost that is no more than the regular cost charged to other persons;
3. In consultation with the person making the request to determine suitability of an accessible format or communication support;
4. The Company will notify the public about the availability of accessible formats and communication supports.

Unconvertible Information or Communications

If the Company determines that information or communications are unconvertible, the Company will provide the person requesting the information or communication with,

- A. an explanation as to why the information or communications are unconvertible; and
- B. a summary of the unconvertible information or communications.

Information or communications are unconvertible if,

- A. it is not technically feasible to convert the information or communications; or
- B. the technology to convert the information or communications is not readily available.

Emergency Information

If the Company prepares emergency procedures, plans or public safety information and makes the information available to the public, the Company shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Website Accessibility

Where practicable, the Company will make any new internet website, and web content on those sites, where the Company controls the websites and web content directly or through a contractual relationship, conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2021 all internet websites and web content backdated to 2012 will conform with WCAG 2.0 Level AA.

EMPLOYMENT STANDARDS

The Company will comply with the requirements of the Employment Standards in the Regulation. The Employment Standards apply in respect of employees, and not volunteers or other non-paid individuals.

Recruitment

The Company will notify employees and the public about the availability of accommodations for applicants and employees, in its recruitment processes.

During the recruitment process, when job applicants are individually selected to participate in an assessment or selection process they will be notified that accommodations are available upon request. If a selected applicant requests accommodation, the Company will consult with the applicant and provide or arrange for a suitable accommodation, taking into account the individual's needs.

The Company will notify successful applicants of its policies for accommodating employees with disabilities, when making offers of employment to a successful applicant.

Employee Notification

The Company shall inform its employees of its policies used to support employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. Such information will be provided as follows:

1. To new employees as soon as practicable after they begin their employment;
2. To existing employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Accessible Formats and Communication Supports

Upon request by an employee with a disability, the Company will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

1. Information that is needed in order to perform the employee's job; and
2. Information that is generally available to employees in the workplace.

The Company will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plans (IAP)

The Company will develop and have in place a written process for developing a documented individual accommodation plan for employees with a disability. The process will include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent,

or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.

5. The steps taken to protect the privacy of the employee's personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

If requested, individual accommodation plans will include any information regarding accessible formats and communication supports provided, and if required, will include individualized workplace emergency response information. They will also identify any other accommodation to be provided.

Return to Work

The Company will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and will outline the steps that the Company will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement and Redeployment

Performance management processes related to assessing and improving employee performance, productivity and effectiveness will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

The Company will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development and advancement to its employees. Career development and advancement includes providing additional responsibilities within an employee's current position, the movement of an employee from one job to another which may provide greater responsibility, compensation and or place the employee at a higher level in the organization, or any combination of these.

If the Company has the need to reassign employees to other departments or jobs within the organization as a result of job elimination, the Company will take into account the accessibility needs of employees with disabilities as well as individual accommodation plans.

Workplace Emergency Response Information

The Company shall provide individualized workplace emergency response information to employees who have a disability.

If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. If the employee who receives individual workplace emergency response information requires assistance and with the employee's consent, the Company shall provide the workplace emergency information to the person designated by the Company to provide assistance to the employee.

This will be done as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the Company reviews its general emergency response policies.

DESIGN OF PUBLIC SPACES

The Company will meet the Accessibility Standards for the Design of Public Spaces when building or redeveloping public spaces. Public spaces include, but are not limited to, outdoor public eating areas, outdoor paths of travel, accessible off street parking and service-related elements such as counters and waiting areas.

QUESTIONS

If anyone has questions about the Company's accessibility policy and/or multi-year accessibility plan, or requires this information in an accessible format, please contact people@o2ebrands.com

O2E BRANDS INC. MULTI-YEAR ACCESSIBILITY PLAN

The Company has already taken the following steps to comply with the Customer Service Standards:

1. The Company has developed and implemented a policy governing its provision of goods, services and facilities to persons with disabilities, in accordance with the Customer Service Standards.
2. The Company has incorporated its policies with respect to service animals and support persons into its policy referenced in paragraph 1 above.
3. The Company has incorporated its procedures for providing notices of temporary disruptions into the policy referenced in paragraph 1 above.
4. The Company has provided the required training to its employees, volunteers, individuals who participate in the development of its policies, and all persons who provide goods, services and/or facilities on the Company's behalf, and will continue to provide such training in accordance with the Customer Service Standards.
5. The Company has developed a feedback process and has incorporated its practices in respect of its feedback process into the policy referenced in paragraph 1 above.
6. All copies of the Company's documentation required by the Customer Service Standards will be provided in an accessible format or with communication support, upon request.

The chart below sets out the Company's strategies for meeting the requirements of the Integrated Accessibility Standards.

ACTIVITY	DEPARTMENT RESPONSIBLE / ACTION PLAN	STATUS
POLICIES & PROCEDURES		
Create Policies with Statement of Organizational Commitment in written form	People & Legal	
Make available to the Public	Legal & Business Technology ("BT")	
ACCESSIBILITY PLAN - MULTI-YEAR		
Develop Accessibility Plan	People & Legal	
Post to O2E Brands Inc. website	Legal & BT	
File Accessibility Report in accordance with section 14 of the AODA	Legal	
Review every 5 years	People	
Provide in alternative format upon request	People	
TRAINING		
All employees & volunteers, policy developers, those providing goods or services on behalf of the organization will be trained regarding the Integrated Accessibility Standards Regulation and Human Rights Code	People	
Develop training content	People	
Create training schedule	People	
Retain record of attendance at training on each date	People	

ACTIVITY	DEPARTMENT RESPONSIBLE / ACTION PLAN	STATUS
INFORMATION & COMMUNICATIONS		
<p>If O2E Brands Inc. prepares emergency procedures, plans or public safety information and makes the information available to the public, O2E Brands Inc. will provide the information in an accessible format or with appropriate communication support, as soon as practicable, upon request.</p>	People	
<p>O2E Brands Inc. will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication support upon request. A review of feedback processes and accessibility will be completed.</p> <p>O2E Brands Inc. will notify the public about the availability of accessible formats and communication support.</p>	People	
<p>Provide accessible formats and communication support upon request in respect of information that is publicly available, in a timely manner at a cost that is no more than the regular cost charged to other persons.</p>	People	
<p>New O2E Brands Inc. websites and content will comply with WCAG 2.0 Level A</p>	BT & Legal	
<p>All O2E Brands Inc. internet websites and web content will comply with WCAG 2.0 Level AA</p>	BT & Legal	
EMPLOYMENT		
<p>Workplace Emergency Response for staff</p>	People	

ACTIVITY	DEPARTMENT RESPONSIBLE / ACTION PLAN	STATUS
Recruitment - notify employees and public regarding availability of accommodation.	People	
Notify applicants of availability of accommodation upon request for assessments or selection process.	People	
Notify successful applicants of O2E Brands Inc.'s policies for accommodating employees with disabilities.	People	
Inform employees of policies regarding job accommodations.	People	
Providing accessible formats and communication supports to perform job	People	
Have documented Individual Accommodation Plans process in place.	People	
Create a return to work process containing all elements required by the Regulation.	People	
Performance management takes into account an employee's accessibility needs.	People	
Career development and advancement process takes into account accessibility needs.	People	
Redeployment process, if any exist at O2E Brands Inc., takes into account accessibility needs.	People	
DESIGN OF PUBLIC SPACES		
Meet the standards for the design of public spaces when building or redeveloping public spaces	People	