



Accessibility Policy and Multi-Year Plan

SCOPE

This policy applies to all employees of Jamieson Wellness Inc. as well as all of its operating subsidiaries (collectively hereinafter “**Jamieson**”) in Canada. In the event of a conflict between this policy and a local policy applicable to employees of the specific entity you work for, the terms of the local policy will govern.

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1. Purpose / Applicability

Under the *Accessibility for Ontarians with Disabilities Act, 2005*, all public and private sector organizations in the Province of Ontario must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility policy, multi-year accessibility plan and related commitments, in accordance with the *Integrated Accessibility Standards* (Ontario Regulation 191/11) for all operations of Jamieson. The *Accessibility for Ontarians with Disabilities Act, 2005*, and its Regulations (including all other standards as may be developed) are collectively referred to hereafter as the AODA.

This Policy applies to all Jamieson employees in Canada.

2. Jamieson's General Accessibility Policy

Jamieson is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA.

2.1 Commitment to Accessible Information and Communications

(i) Accessible Formats and Communication Supports

Upon request, will provide the following in an accessible format or via accessible communication support:

- (a) all organizational information and communications made available to Jamieson's customers and the public, including this policy;
- (b) any publicly available emergency procedures, plans or public safety information to its customers and the public; and
- (c) access to any processes for receiving and responding to feedback.

Jamieson will consult with the person making the request to determine the suitability of any accessible format or communication support provided. This information and documentation will be provided as soon as is practicable, but specific timeframes may vary depending on the format requested.

(ii) Website Accessibility

Any internet websites, web content and web-based applications published after January 2012 will conform to WCAG 2.0 Level AA (other than success criteria 1.2.4 and 1.2.5), except where doing so is not practicable.

(iii) Feedback Regarding Accessibility

Jamieson encourages persons with disabilities to provide comments on the goods, services and facilities they receive or use, including feedback regarding the accessibility of those goods, services or facilities.

Feedback may be delivered to Jamieson in person, by telephone, mail, email, facsimile or other means available to the person.

Customers may use any of the following feedback channels:

- In person at Jamieson's office:
4025 Rhodes Drive, Windsor ON, N8W 5B5

- By telephone or e-mail:
consumeraffairs@jamiesonlabs.com
1-800- 265-5088
- By mail: in writing or through electronic or audio recording.

All feedback will be reviewed for possible improvement. Feedback will be directed to the most appropriate department for resolution, and any complaints will be addressed as soon as possible. Persons providing feedback can expect an acknowledgment of their feedback to be issued within 10 business days. The acknowledgment will indicate when the matter will be addressed, and when the individual will be notified further in the matter. Correspondence with the individual will take into account their accessibility needs and will be provided in accordance with Jamieson's commitment to accessible information and communication supports, described above.

2.2 Accessible Employment

Jamieson has implemented the following practices and procedures to promote the inclusion of applicants for employment and existing employees with disabilities in its workplace.

(i) Recruitment

Jamieson notifies employees and the public about the availability of accommodations for applicants with disabilities during the recruitment process and when job applicants are individually selected to participate in an assessment or selection process.

If a selected applicant requests an accommodation, Jamieson consults with the applicant and provides or arranges for the provision of a suitable accommodation (including with respect to any materials or processes used in the application process), taking into account the applicant's disability.

When making offers of employment, Jamieson notifies successful applicants of its policies for accommodating employees with disabilities.

(ii) Employee Notification

Jamieson informs its employees of its policies used to support its employees with disabilities: (a) to new employees as soon as practicable after they begin their employment; and (b) whenever there is a change to existing policies on the provision of job accommodations that take into account accessibility needs due to a disability.

(iii) Accessible Formats and Communication Supports

Where an employee with a disability requests it, Jamieson will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: (a) information that is needed in order to perform the employee's job; and (b) employment information that is generally available to employees in the workplace.

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

(iv) Individual Accommodation Plans

Jamieson has a written accessible Employment Policy which includes a process for Individual Accommodation Plan. A copy of the Accessible Employment Policy, can be found posted on Jamieson's payroll site: ADP.

(v) **Return to Work Process**

Jamieson has 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. A copy of this process can be found in the Accessible Employment Policy, which is posted on Jamieson's payroll site: ADP.

(vi) **Performance Management, Career Development and Advancement and Redeployment**

Jamieson takes into account the accommodation needs of its employees, including any individual accommodation plans of employees, when: (a) using performance management; (b) providing career development and advancement opportunities; and (c) redeploying employees.

(vii) **Workplace Emergency Response Information**

Jamieson provides 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. More details regarding this process can be found in the Accessible Employment Policy, which is posted on Jamieson's ADP payroll website.

2.3 Training Commitment

Jamieson provides three types of training related to accessibility: accessible customer service training (as further discussed in section 3.6 below); integrated standards accessibility training; and training on the *Human Rights Code* as it relates to individuals with disabilities.

This training will be provided to all employees as soon as practicable and generally, within three months of the individual's commencement of duties. Training will also be provided on an ongoing basis when changes are made to these policies, practices and procedures.

Jamieson will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

3. Accessible Customer Service

Jamieson is committed to providing access to goods and services to its customers in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is in compliance with the AODA. To that end, Jamieson recognizes the importance of:

- Providing integrated access to goods and services for individuals with disabilities;
- Openly communicating and responding to the needs of customers with disabilities in order to provide them with excellent customer service; and
- Complying with the mandatory Customer Service Standard addressed under the AODA.

3.1 Accessible Customer Communications

Jamieson employees are required to communicate with customers with disabilities in a manner that takes into account their disabilities. Representatives will consider how a customer's disability may affect the way that the customer expresses, receives or processes communications and, where possible, they will ask the customer how to best communicate with them.

3.2 Assistive Devices

Assistive devices that may be used by individuals with disabilities are welcome on Jamieson's premises that are open to the public or other third parties. Jamieson will take steps to ensure that Representatives are familiar with commonly used assistive devices.

3.3 Service Animals

Jamieson welcomes guide dogs or other animals that serve individuals with disabilities in those areas of its premises that are open to customers and will permit the customer to keep the service animal with them, except for those animals that are otherwise excluded by law from the premises. In the event that a service animal is otherwise excluded by law from the premises, Jamieson will provide the applicable customer with an alternative method of obtaining, using or benefitting from its goods or services.

3.4 Support Persons

Jamieson welcomes persons who support individuals with disabilities to Jamieson then onto those parts of its premises that are open to the public or other third parties. Jamieson will ensure that customers who so require have access to their support persons while on the premises. Such support persons need not be paid, professional support workers. They may be volunteers, family members or friends who provide support to the customer.

3.5 Temporary Unavailability of Access to Goods or Services for Customers with Disabilities

In the event that a facility, service or system offered by Jamieson to customers with disabilities becomes temporarily unavailable, in whole or in part, Jamieson will provide notice of the disruption, as is reasonable in the circumstances. The notices will be posted in a conspicuous location at Jamieson or in another reasonable location, in the circumstances and shall:

- Explain the reason for and anticipated length of the disruption; and
- Provide a description of and indicate the location of an alternative facility or service that is accessible to individuals with disabilities, if available.

3.6 Accessible Customer Service Training

All Jamieson employees will be:

- Provided with an overview of the AODA and the Customer Service Standard under the Regulations;
- Trained on how to interact, communicate and assist people with disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
- Made aware of the policies and procedures created by Jamieson in accordance with the Customer Service Standard; and
- Trained on how to help a person with a disability who is having difficulty accessing Jamieson's goods or services.

This training will also be provided on an ongoing basis, as soon as practicable, whenever Jamieson's policies change with respect to customer service accessibility for individuals with disabilities.

4. Multi-Year Accessibility Plan

Under the AODA, private and not-for-profit organizations with 50 or more employees in Ontario must create a multi-year accessibility plan. This Multi-Year Accessibility Plan outlines the policies and actions that Jamieson will or has put in place to improve opportunities for people with disabilities across the organization.

This multi-year accessibility plan will be updated at least once every five years.

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
General Requirements		
Establish accessibility policies governing how Jamieson will meet its obligations under the AODA	3.(1)	Complete - see further section 2 of this policy.
Establish, implement and maintain a documented multi-year accessibility plan; post the plan on the website; review and update the plan at least once every five years	4.(1)	Complete - see further section 4 of this policy
Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks	6.(2)	Not currently applicable
Training on the requirements of the accessibility standards and on the Human Rights Code as it relates to persons with disabilities	7.(1)	Complete - see further section 2.2 of this policy
Customer Service Standards		
Develop, implement and maintain policies governing the provision of Jamieson's services to persons with disabilities, and provide in an accessible format upon request	80.46 (1)	Complete - see further sections 2.1(i) and 3.1 of this policy
Training on accessible customer service	80.49 (1)	Complete - see further sections 2.2 and 3.6 of this policy
Information and Communications Standards		
Ensure that feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request	11.(1)	Complete - see further section 2.1(iii) of this policy
Upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, in consultation with the	12.(1), (2) and (3)	Complete - see further section 2.1(i) of this policy

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
individual, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons. Notify the public of the availability of these supports		
Provide any publicly available emergency response information in an accessible format, upon request	13. (1)	Complete - see further section 2.1(i) of this policy
Ensure new internet websites and web content on those sites conform with WCAG 2.0 Level	14. (4)1	Complete - see further section 2.1(ii) of this policy
By January 1, 2021, ensure all internet websites and web content conform with WCAG 2.0 Level AA, other than, i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded)	14. (4)2	Complete - see further section 2.1(ii) of this policy
Employment Standards		
Notify Jamieson employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes	22	Complete - see further section 2.2(i) of this policy
During a recruitment process, notify job applicants when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	23	Complete - see further section 2.2(i) of this policy
Notify successful job applicant of Jamieson's policies for accommodating employees with disabilities	24	Complete - see further section 2.2(i) of this policy
Inform employees of Jamieson's policies used to support employees with disabilities	25	Complete - see further section 2.2(ii) of this policy
Consult with a requesting employee in a manner that considers his or her disability to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace	26.1 and 26.2	Complete - see further section 2.2(iii) of this policy

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
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	27	Complete - see further section 2.2(vii) of this policy
Develop and implement a written process for documenting individual accommodation plans for employees with disabilities	28	Complete - see further section 2.2(iv) of this policy
Develop and implement a return to work process employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work	29	Complete - see further section 2.2(v) of this policy
Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities	30	Complete - see further section 2.2(vi) of this policy
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 with disabilities	31	Complete - see further section 2.2(vi) of this policy
Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities	32	Complete - see further section 2.2(vi) of this policy
Design of Public Spaces		
Ensure that any new or redeveloped outdoor Paths of Travel (i.e. sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals) comply with the requirements of the AODA	80.22	Not currently applicable
Ensure that any new or redeveloped parking (on and off street) complies with the requirements of the AODA	80.32	Not currently applicable
Ensure that any newly constructed service counters and fixed queuing lines, and any newly constructed or	80.40	Not currently applicable

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
redeveloped waiting areas, comply with the requirements of the AODA		
Develop procedures for preventative and emergency maintenance of the accessible elements in the above-noted public spaces and procedures for dealing with temporary disruptions when the above-noted accessible elements are not in working order	80.44	Not currently applicable

5. Availability of this Policy

A copy of this policy will be posted on Jamieson's corporate website.

Upon request, Jamieson will provide or arrange for the provision of this policy, or the information contained in this policy, to the requesting individual in an accessible format or with a communication support in a timely manner that takes into account the person's accessibility needs due to disability and at no cost. In doing so, Jamieson will consult with the person making the request in determining the suitability of the format or communication support.

APPENDIX A – DEFINITIONS

“**Accessible Formats**” means any form of large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities in order to conduct business with Jamieson.

“**Communication Supports**” means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications in order to conduct business with Jamieson.

“**Disability**” as defined in the Ontario *Human Rights Code* means:

- (a) **any degree of physical infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co- ordination, blindness or visual impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog, or other animal or on a wheelchair or other remedial appliance or device,**
- (b) **a condition of mental impairment or a developmental disability,**
- (c) **a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,**
- (d) **a mental disorder, or**
- (e) **an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.**

“**Representative**” means employees, volunteers, others that provide goods or services on Jamieson’s behalf, and all those who are involved in the development of Jamieson’s policies, practices and procedures.

“**Web Content Accessibility Guidelines**” means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”.

“**Website**” means a collection of related webpages, images, videos, or other digital assets that are addressed relative to a common Uniform Resources Identifier (URI) and is accessible to the public.

COMMUNICATION

The Human Resources department is responsible for the administration of this policy.

We will provide a copy of this policy to all existing employees within 30 days of the date on which the policy was initially required to be implemented. We will provide a copy of this policy to each new employee within thirty (30) days of the day such person becomes an employee.

If you have any questions regarding the Electronic Monitoring Policy, please contact your designated Human Resources Representative.

AMENDMENTS

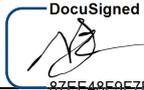
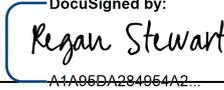
We may revise and update this policy from time to time. Employees will be provided with a copy of the updated policy within thirty (30) days of any changes being made, or otherwise as required by the ESA.

RETENTION

We will retain copies of every written policy on electronic monitoring required under applicable legislation for three years after the policy ceases to be in effect.

1. REVIEW AND APPROVAL

This policy was reviewed and approved by:

Name	Title	Signature	Date
Nicole Stuart	Vice President, People & Culture	 87EE48F0F7B448B...	1/31/2023
Regan Stewart	Chief People & Operations Office	 A1A95DA284964A2...	2/7/2023

2. REVISION HISTORY

Revision	Date Released	Comments / Changes to the Policy
1.0	January 24, 2023	Initial policy