ACCESSIBILITY POLICY & MULTI-YEAR ACCESSIBILITY PLAN

INTRODUCTION & STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the "AODA"). The Integrated Accessibility Standards Regulations ("IASR") under the AODA requires that effective January 1, 2014, Harry Rosen Inc. ("the Company") establish, implement, maintain and document an accessibility policy and a multi-year accessibility plan outlining its strategy to prevent and remove barriers for persons with disabilities and to meet the requirements under the IASR.

In Manitoba, the Accessibility for Manitobans Act (the "AMA") and its accessibility standards also establishes requirements for organizations who operate in the province. Harry Rosen Inc. is committed to meeting the applicable requirements in each province in which it operates.

Under the AODA, the following accessibility standards set certain requirements that are applicable to the Company:

- Customer Service;
- Training;
- Information and Communications;
- Employment; and
- Design of Public Spaces

This **multi-year plan** outlines the Company's strategy to prevent and remove barriers to address the current and future requirements of the AODA the IASR and the AMA, and in order to fulfill on Harry Rosen's commitment to ensure that our environment is barrier-free to all persons, employees and clients alike, as we believe in equal opportunity. In line with this commitment, Harry Rosen will:

- Establish, review and update this plan;
- Post this plan on its website (www.harryrosen.com);
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years in accordance with the requirements of AODA and IASR.

OVERVIEW OF ACCESSIBILITY STANDARDS

Customer Service Standard

We are committed to excellence in serving all customers, including persons with disabilities and will carry out our functions in a manner that delivers the Harry Rosen experience consistent with our Brand Promise to all individuals.

Steps taken: Harry Rosen established a ***Clients with Disabilities Customer Service Policy Statement***. outlining it's commitment to accessible customer service. The Company will continue to maintain, review and comply with its customer service policies and practices to ensure they meet or exceed applicable requirements.

Timeframe: Ongoing (in compliance since 2011)

Employment Standard

1. Workplace Emergency Response Information

Where the Company is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Steps taken: Individualized workplace emergency response information procedures have been developed for employees with disabilities who have come forward, as required and communicated to the employees' respective Managers and Health & Safety committee members, on an 'as needed' basis.

Timeframe: Ongoing (in compliance since 2011)

2. Recruitment

Harry Rosen Inc. is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle. In accordance with the IASR and the AMA, Harry Rosen Inc. will do the following:

Job Postings: The Company will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process, specifying that accommodation is available for applicants with disabilities, on the Company's website and on job postings.

Assessment and Selection: The Company will 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 in the assessment/selection process. This will include:

- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants: When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- Inclusion of notification of the Company's policies on accommodating employees with disabilities in offer of employment letters.

Timeframe: Ongoing, (in compliance since 2016)

3. Informing Employees of Supports

In accordance with the IASR and the AMA, the Company will inform all employees of policies that 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.

Harry Rosen Inc. will ensure that the **return to work process** as set out in its existing policies outlines the steps the Company will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation.

The Company will 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;
- Providing career **development and advancement** to its employees with disabilities;
- **Redeploying** employees with disabilities.

Steps taken: The Company has policies and practices in place outlined in a formal *Return to Work Program* in order to accommodate employees with disabilities and facilitate a safe return to work. The Company also has a formal policy and process established to accommodate employees with disabilities (*Accommodation Process & Policy*) and means to obtain accommodation information as requested through our *Medical Questionnaire*, which maintains employee's privacy.

In all areas of performance management, development and redeployment, accessibility needs of employees are taken into account.

Timeframe: Ongoing, (in compliance since 2016)

Training Standard

In accordance with the IASR and the AMA, the Company will determine and ensure that appropriate training on the requirements of the applicable accessibility standards and on the applicable Human Rights Code (Ontario or Manitoba) as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide goods, services and facilities on the Company's behalf, and persons participating in the development and approval of the Company's policies as soon as practicable, and furthermore:

- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis

Steps taken: All new and existing employees are trained on Violence & Harassment policies and programs; this includes our 'Ethics'booklet which outlines the Human Rights Code' standards, including discrimination as it pertains to persons with disabilities. In addition, existing and new employees are provided with detailed training specific to their job function on the respective IASR standards.

Timeframe: Ongoing (in compliance since 2015)

Information & Communication Standard

1. Feedback & Communication Supports

In accordance with the IASR, Harry Rosen will ensure that existing and new processes for **receiving and responding to feedback** are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner.

Generally, where accessible formats and **communication supports** by persons with disabilities are required:

- The Company will consult with the person making the request to determine the suitability of the accessible format or communication support;
- Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons;
- Notify the public about the availability of accessible formats and communication supports

Steps taken: See ***Clients with Disabilities Customer Service Policy Statement*** for feedback process.

Timeframe: Ongoing and in compliance since January 1st, 2016

2. Accessible Websites and Web Content

Harry Rosen Inc. will ensure that all New Internet Websites controlled by the Company and its websites that undergo a significant refresh conform with WCAG 2.0. Level A. Furthermore, Harry Rosen Inc. will ensure that all websites and online content controlled by it conform with WCAG 2.1 Level AA, in accordance with the applicable regulatory requirements. When designing or updating our Internet websites, the Company will ensure that it is developed in accordance with the regulations, except where not practicable.

Timeframe: Ongoing (in compliance since January 2021)

Design of Public Spaces

Harry Rosen Inc. will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces which it owns and/or controls. Public spaces include areas such as outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas, accessible off street parking, and service-related elements like service counters, fixed queuing lines and waiting areas.

If there is temporary disruption of goods, services or facilities used by people with disabilities, Harry Rosen will post a notice of disruption to the public which will include the reason for the disruption, its anticipated duration and a description of alternative facilities/services (if available).

Timeframe: Ongoing (in compliance since 2017)

Annual Accessibility Status Reports

Harry Rosen Inc. will prepare and file accessibility status reports as required by the legislation.

Timeframe: Ongoing