

ZOOMERMEDIA LIMITED
ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES POLICY

PURPOSE

This policy has been prepared in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”) and its associated regulations, including the Accessibility Standards for Customer Service and the Integrated Accessibility Standards.

This policy shall set out how ZoomerMedia Limited (the “Company”) will comply with the requirements of the AODA including provision of customer service, implementing hiring practice, making public spaces accessible and having the necessary training for employees.

The Company is committed to meeting the accessibility needs of people with disabilities. The Company will use reasonable efforts to ensure that the provision of goods and services is consistent with the following guiding principles:

- Respecting the dignity and independence of people with disabilities
- Ensuring that the provision of goods and services to people with disabilities is integrated with the provision of goods and services to others unless an alternative measure is necessary
- Ensuring that people with disabilities are given an equal opportunity to obtain, use and benefit from the goods and services provided by the Company

This policy shall be maintained on the Company’s bulletin board and provided, upon request, in a format that takes a person’s accessibility needs due to disability into account.

1.1 Application

This policy applies to all employees, volunteers, and to any individual or organization that provides facilities, goods or services to third parties on behalf of the Company.

1.2 Establishment of Multi-Year Accessibility Plan

The Company has a Multi-Year Accessibility Plan. The Multi-Year Accessibility Plan describes the specific short-term and long-term actions that the Company shall take to meet its obligations under the AODA and its regulations within the required timelines. The Company shall update the Multi-Year Accessibility Plan at least once every five years. The Multi-Year Accessibility Plan shall be posted on the Company’s bulletin board.

1.3 Training

All employees, volunteers, and third parties, involved in the provision of goods and services to members of the public or people with disabilities on the Company’s behalf shall

receive training regarding the requirements of the AODA and its regulations, and regarding the Ontario Human Rights Code as it relates to people with disabilities.

Training shall include:

- How to interact and communicate with persons with various types of disability
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog, other service animal or support person
- How to use equipment or devices available on the Company's premises or otherwise provided by the Company that may help with the provision of goods or services to a person with disability
- What to do if a person with a disability is having difficulty accessing the Company's goods or services

The training provided shall be appropriate to the duties of the employee, volunteer, person or third party. Training shall take place as soon as is practicable and the Company shall keep a record of the training provided, including the dates on which the training took place and the number of people to receive training.

1.4 Accessibility Compliance Reports

The Company shall file Accessibility Compliance Reports in accordance as required by the Ministry of Economic Development, Trade and Employment. The Accessibility Compliance Report is an online report that confirms that the Company is meeting the accessibility requirements set out in the AODA and its regulations.

2. ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

2.1 Assistive Devices

The Company shall accommodate the use of assistive devices in order to ensure that people with disabilities are able to obtain, use or benefit from the Company's facilities, goods and services. Assistive devices include, but are not limited to, wheelchairs, canes, walkers, scooters, screen readers, listening devices and Braille display boards.

2.2 Service Animals

The Company shall accommodate the use of guide dogs and other service animals. Guide dogs and other service animals shall be permitted to enter the Company's premises and to remain with the person with the disability unless the guide dog or other service animal is otherwise excluded by law. If the guide dog or other service animal is otherwise excluded by law, the Company shall ensure that other measures are available to allow the person with the disability to use, obtain or benefit from the Company's facilities, goods and services.

2.3 Support Person

The Company shall accommodate a person with a disability's need for the assistance of a support person. If a person with a disability is accompanied by a support person, the Company shall ensure

that both persons are permitted to enter the Company's premises. The person with the disability will not be prevented from having access to the support person while on the Company's premises.

If the Company charges an admission fee in connection with a support person's presence, the Company shall ensure that advance notice of the amount that is payable in respect of the attendance of the support person is provided.

The Company may require that a person with a disability be accompanied by a support person if necessary to protect the health and safety of the person with the disability.

2.4 Notice of Temporary Disruptions in Service

The Company shall provide notice of temporary disruptions in the facilities or services that people with disabilities use to obtain or benefit from the Company's goods or services. Facilities or services may include accessible washrooms, accessible parking spots, amplification systems or note-taking devices.

Notice of temporary disruptions in service shall include the reason for the disruption, the anticipated duration of the disruption and a description of available alternative facilities, if any. Notice of temporary disruptions may be provided by a variety of methods, depending on the circumstances, and may include posting notices in places where people are likely to see them.

2.5 Feedback

The Company shall receive and respond to feedback regarding the manner in which it provides goods or services to people with disabilities. People with disabilities shall be able to provide feedback and receive responses to feedback in a manner that takes into account a person's accessibility needs due to disability. Feedback may be received and responded to in person, by telephone, in writing or by delivery of electronic text to the Vice President & Chief Financial Officer

3. INTEGRATED ACCESSIBILITY STANDARDS: INFORMATION & COMMUNICATIONS STANDARDS

3.1 Accessible Formats and Communication Supports

The Company shall communicate with people with disabilities in a manner that takes into account a person's disability. Taking a person's disability into account may require the Company to consider how a disability affects the way in which a person expresses, receives or processes communications, and to respond accordingly.

Except as otherwise provided by the AODA and its regulations, the Company shall, upon request and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for people with disabilities. Accessible formats include alternatives to standard print, such as braille or large font, and communication supports include methods to assist communication that are other than spoken word.

Accessible formats and communication supports shall be provided in a timely manner, shall take into account the person's accessibility needs due to disability and shall be provided at a cost that is

not more than the regular cost charged to other persons.

The above does not apply to products and product labels, unconvertible information or communications and information that the Company does not control directly or indirectly through a contractual relationship. If the Company determines that information or communications are unconvertible, the Company shall provide the person requesting the information or communication with an explanation as to why the information or communication is unconvertible and a summary of the unconvertible information or communication.

3.2 Accessible Website and Web Content

The Company shall ensure that its internet websites and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A by January 1, 2014 and Level AA by January 1, 2021.

4. INTEGRATED ACCESSIBILITY STANDARDS: EMPLOYMENT STANDARDS

4.1 Application

The standards listed below apply to the Company's paid employees only.

4.2 Recruitment

The Company shall notify job applicants of the availability of accommodations for applicants with disabilities during the recruitment process.

The Company shall also notify job applicants who are selected to participate in an assessment process of the availability of accommodations for applicants with disabilities during the assessment process. Accommodations are available upon the job applicant's request and are available in relation to the materials or processes to be used throughout the assessment process. If a job applicant requests an accommodation, the Company shall consult with the person making the request to provide for or arrange for the provision of accommodation that takes the person's accessibility needs due to disability into account.

Successful job applicants shall be notified of the Company's policies for accommodating employees with disabilities at the time an offer of employment is made or as soon as is practicable thereafter.

4.3 Employee Supports

The Company shall inform new and existing employees of its policies for accommodating employees with disabilities, including policies on the provision of employment-related accommodations that take into account an employee's accessibility needs due to disability. When there are changes to the Company policies for accommodating employees with disabilities, the Company shall provide an update regarding the changes.

4.4 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the Company shall provide the employee with, or arrange for the provision of, information that is necessary in order for the employee to perform a

job and information that is generally available in the workplace. The Company may consult with the employee to determine the suitability of an accessible format or communication support.

4.5 Individualized Workplace Emergency Response Information

The Company shall provide individualized workplace emergency response information to employees who have disabilities if the disability is such that the individualized information is necessary and the Company is aware of the need for accommodation due to the person's disability.

The Company shall provide individualized workplace emergency response information as soon as practicable after becoming aware of an employee's need for accommodation. The Company shall update the employee's individualized workplace emergency response information when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when the Company reviews its general emergency response policies.

If an employee with a disability requires assistance during a workplace emergency, the Company is only able to provide the employee's individualized workplace emergency response information to another employee designated to provide assistance upon the consent of the employee with the disability.

4.6 Documented Individual Accommodation Plan

The Company shall develop a written process for the creation of documented individual accommodation plans for employees with disabilities. Documented individual accommodation plans shall identify and describe the accommodations that are required, and shall contain the following elements:

- How employees with disabilities can be involved in the development process of their documented individual accommodation plan
- How employees with disabilities are assessed on an individual basis
- How the Company can seek outside medical or other expert evaluation so that it can provide effective support
- What steps are taken to protect the privacy of the employee's personal information?
- How frequently documented individual accommodation plans will be reviewed and updated and how this will be done
- If an accommodation is denied, that the reason for the denial will be provided to the employee
- If required, how the documented individual accommodation plan will be provided to the employee in a manner that takes the employee's accessibility needs due to disability into account (for example, whether accessible formats and communication supports are required)
- If applicable, information regarding the employee's individualized workplace emergency response information

4.7 Return to Work Process

The Company shall have in place a documented return to work process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work. The return to work process shall outline the steps that the Company will take to

facilitate the return to work of employees with disabilities. The return to work process shall make use of the employee's documented individual accommodation plan, if applicable.

4.8 Performance Management, Career Development and Redeployment

The Company shall take into account the accessibility needs of employees with disabilities and the documented individual accommodation plans of employees with disabilities, if applicable, when carrying out performance management processes and when assessing career development and redeployment opportunities.

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