



## **ACCESSIBILITY PLAN PURSUANT TO THE ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005**

This Accessibility Plan for Breakthru Beverage Canada (the “Company”) outlines the policies, practices and actions that the Company will implement in its Ontario operations over a multi-year period (the “Plan”) to improve accessibility for individuals with disabilities. The Plan also incorporates and references the Company existing accessibility policies and practices in an effort to streamline the Company’s efforts in achieving its accessibility goals, and to comply with all applicable laws.

### **1. Statement of Commitment**

The Company is committed to ensuring that we provide services to our clients and client representatives with disabilities in an accessible manner and in a way that respects the dignity and independence of those individuals. The Company’s commitment to ensuring accessible service is part of our overall objectives of providing excellent client service and promoting diversity. We are committed to meeting the needs of all individuals with disabilities in a timely manner and will identify and remove barriers to accessibility in the Company’s operations and services. We believe in integration and equal opportunity. We are committed to ensuring compliance with the accessibility requirements contained in the *Accessibility for Ontarians with Disabilities Act, 2005* and its regulations (“AODA”).

The Human Resources team at the Company will be responsible for ensuring that the Company implements the obligations contained in this Plan in accordance with this Statement of Commitment.

### **2. Customer Service**

The Company maintains an accessibility policy in respect of customer service, along with appropriate feedback mechanisms with respect to that policy. We remain committed to

complying with this policy and will review it on an ongoing basis for any required changes in order to promote accessibility within our client service operations.

The Company has procedures in place to notify the public of service disruptions to the accessible parts of our offices and to prevent such disruptions to the extent reasonably possible.

### **3. Accessible Emergency Information**

The Company is committed to providing clients and other third parties with any publicly available emergency information in an accessible manner, upon request. We will also provide employees with disabilities with individualized emergency response information where necessary, in accordance with AODA. The Company will take steps to determine whether employees require individualized emergency response information as part of our on-boarding process for new employees and our continuing occupational health and safety planning.

### **4. Training**

The Company has completed the training required by the Accessibility Standards for Customer Service under AODA and will continue to provide updated training to new staff as required.

The Company has also completed training for employees and other staff (including all persons who participate in the development of our policies and provide goods and services on our behalf) regarding AODA and the Ontario *Human Rights Code* as it pertains to individuals with disabilities as required by AODA.

### **5. Kiosks**

Following a review of our operations, it has been determined that the Company does not maintain kiosks. However, to the extent that kiosks are acquired or operated in the future, the Company will consider accessibility issues at that time.

### **6. Information and Communications**

The Company is committed to meeting the communication needs of individuals with disabilities. The Company will, in consultation with such individuals, provide information and communications in an accessible format in a timely manner. Such information and communications will be provided at no cost or at a cost that is no more than any regular cost. The Company has developed practices to ensure that it can make information accessible to individuals with disabilities upon request, and shall update its practices on an ongoing basis as required.

The Company is also committed to ensuring that individuals with disabilities have the ability to access the Company's feedback processes and has completed a review of all

existing feedback processes and considered the manner in which those processes can be made accessible upon request by individuals with disabilities. Individuals will be notified about the accessibility of feedback processes in accordance with AODA.

The Company will monitor the creation of any new Internet websites and content, including those Internet websites undergoing a significant refresh and as applicable will make those websites conform to WCAG 2.0 Level A by January 1, 2014, or thereafter. The Company also recognizes its obligation under AODA to ensure the accessibility of its internet websites in accordance with WCAG 2.0 Level AA (with certain exceptions) by January 1, 2021. On an ongoing basis, the Company will ensure a process is in place to confirm these obligations as any new content or sites are created or existing content is significantly refreshed and to meet 2021 obligations.

## **7. Employment**

The Company is committed to accessible employment practices and to removing any barriers that prevent or hinder the recruitment, retention and career development of employees with disabilities. On an ongoing basis, we will take the following steps to ensure compliance with AODA:

- Notify our employees, potential candidates and the public (including via our recruitment website) that the Company accommodates people with disabilities as required by law, at all times during the recruitment and selection process and during the course of employment, including making such information available in accessible formats;
- The Human Resources and leadership teams at the Company will continue to be trained with respect to accommodations for persons with disabilities to ensure that the needs of employees with disabilities are considered in performance management and career development processes and strategies;
- The Company will renew its employment-related documentation for Ontario employees to ensure that such documentation is compliant with AODA and its regulations; and
- The Company will ensure its continuing commitment to developing individual accommodation and return-to-work plans whenever appropriate.

## **8. Design of Public and Client Spaces**

The Company will meet its AODA accessibility obligations in respect of the design of public and client spaces when building or making major modifications to these spaces, including meeting rooms, reception and waiting areas. In order to ensure that accessibility issues are taken into account in the context of new builds and major modifications on or before January 1, 2017, the Company will ensure that our leadership and facilities teams are fully aware of the AODA requirements and will work with relevant designers, engineers, builders, and other experts and third parties involved in the builds or modifications to ensure that all necessary requirements are met.

## **9. Modification of the Plan**

This Plan will be reviewed and updated by the Company at least every five years. At the time of revision, information regarding accessibility policies and practices adopted by the Company in accordance with the Plan or otherwise will be included in the revised Plan.

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For more information regarding the Plan, please contact:

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