



Accessibility Policy

Purpose

This accessibility policy and plan outlines the actions that Generation Capital Limited (the "Company") has and will put in place to improve opportunities for people with disabilities in accordance with applicable legislation. In addition to this policy and plan, the Company also has a separate policy regarding accessible customer service.

Statement of Commitment

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the 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 applicable legislation.

Scope

This policy applies in Ontario.

Applicable Legislation

This policy is intended to comply with applicable legislation in applicable provinces, including applicable accessibility and human rights legislation (all such legislation, as amended from time to time, the "Applicable Legislation").

Emergency Information and Procedures

The Company is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide individualized workplace emergency response information to employees with disabilities if we are made aware of the need for accommodation.

Training

The Company has provided, and will continue to provide, training as it relates to people with disabilities to all persons within the Company who are responsible for: recruiting, selecting or training employees; supervising, managing or coordinating employees; promoting, redeploying or terminating employees; providing goods, services or facilities on behalf of the Company; communicating directly to the public or to another organization on behalf of the Company; and developing and implementing Company policies (all such persons collectively referred to in this Policy as "Company Personnel"), in accordance with the requirements set out in Applicable Legislation.

Depending on the duties of applicable Company personnel, training will include the following:



- the requirements of Applicable Legislation and the Company's policies, practices and procedures;
- how to identify, prevent and remove accessibility barriers;
- how employment opportunities may be made accessible to persons with disabilities;
- how to interact and communicate with people with various types of disabilities, including how to provide information through a communication support or accessible format;
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- how to use the assistive devices available on our premises; and
- what to do if a person with a disability is having difficulty in accessing the Company's goods, services or facilities.

Training will be provided as soon as practicable after a person is hired or assigned to applicable duties and on an ongoing basis when changes are made to this policy. Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of Applicable Legislation.

Feedback Processes

The Company has taken, and will continue to take, reasonable steps to ensure that its existing feedback processes are accessible to people with disabilities upon request.

Comments on our services to customers with disabilities are welcome and appreciated. Feedback regarding the way the Company provides goods and services to people with disabilities, and about the accessibility of the feedback process itself, can be made by:

- **Email:** accessibility@generationcapital.com
- **Verbally by phone:** (416) 681-1177
- **Online:** Accessible feedback form on our website
- **In person:** At our office location during business hours
- **Mail:** 17 Prince Arthur Ave, 3rd Floor, Toronto, ON M5R 1B2



All feedback, including complaints, will be directed to HR Manager. Customers can expect to hear back within 5 days.

Accessible formats and communication supports are available on request.

Accessible Formats

The Company is committed to meeting the communication needs of people with disabilities in a timely manner that takes into account the person's accessibility needs and at no additional cost to the person.

We will take reasonable steps to ensure that all publicly available information controlled by the Company is provided in an accessible way upon request. The Company will also consult with the person making the request to determine his or her information and communication needs. Individuals may request feedback forms or communication supports in accessible formats, including but not limited to:

- Large print
- Email or plain-language format
- Verbal feedback

The Company will notify the public about the availability of accessible formats and communication supports, including with respect to the feedback process, by posting a notice to the website.

Emergency Procedures, Plans, and Public Safety Information

Upon request, any emergency procedures, plans or public safety information the Company prepares and makes available to the public will be provided in an accessible format or with appropriate communication supports as soon as practicable.

The Company shall, as soon as practicable, 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 Company is aware of the need for accommodation due to the employee's disability. An individual and documented emergency and evacuation plan will be provided to any such employee, as well as to any person designated to assist the employee, with the consent of that employee. The Company shall review the individualized workplace response information upon the following events:

1. When the employee moves to a new location in the workplace;
2. When the employee's overall accommodation needs are reviewed; and
3. Upon review of the Company's general emergency response policies.



Websites

The Company will take reasonable steps that the website controlled by the Company, and content on this site published after January 1, 2012 (other than live captions and pre-recorded audio descriptions), conform with the World Wide Web Consortium Web Content Accessibility Guidelines ("WCAG") 2.1, Level AA, in accordance with Applicable Legislation, if meeting such requirements is practicable given, among other things, the availability of commercial software or tools.

Employment

The Company is committed to fair and accessible employment practices.

During the recruitment process, the Company will notify job applicants and the public about its commitment to accommodate those with disabilities and will advise those selected for an interview that accommodation is available upon request. Job descriptions will be reviewed on an ongoing basis to ensure that stated requirements are necessary and the Company will take steps to prevent and remove any accessibility barriers it identifies as unnecessary.

If a selected applicant requests a disability-related accommodation, the Company will consult with the applicant and arrange for the provision of suitable accommodations in a manner that considers the applicant's accessibility needs. Advertisements will include a statement that the Company is an inclusive workplace and welcomes all qualified applicants to apply.

When making offers of employment, the Company shall notify a successful applicant of its policies regarding disability accommodations. New employees will receive information related to disability accommodations as soon as practicable after they begin their employment. Whenever there is a change to the Company's existing policies related to disability accommodations, the Company will provide updated information to its employees as soon as practicable.

Discussions around performance management, career development and advancement, and reassignment will address any disability-related accommodation needs. Where accommodation needs are identified, management will work with Human Resources to ensure that employees are provided with accommodation in accordance with their needs. Individual accessibility needs and individual accommodation plans will be taken into account during any performance management, career development and advancement, and reassignment process.

- *Performance management* includes activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.



- *Career development and advancement* includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.
- *Reassignment* includes the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

Documented Individual Accommodation Plans

In accordance with the process below, the Company shall develop documented individual accommodation plans for employees with disabilities, identifying any accommodations to be provided (each such plan, a "Plan"). Upon request, a Plan will include any information regarding accessible formats and communications supports provided. A Plan will also include information regarding individualized workplace emergency response information as required. Plans will be reviewed and updated on an as-required basis, including when an employee moves to a different location within the Company's organization and when the Company reviews its general emergency response policies. In developing Plans, the Company shall consider:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual basis.
- 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.
- 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.
- The steps taken to protect the privacy of the employee's personal information and personal health information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.



Return to Work Process

Employees returning to work after a period of disability will work with Human Resources to develop a suitable return to work plan that addresses barriers and accommodation needs for a successful transition to the workplace. As part of the return to work process, the Company will outline the steps it will take to facilitate the employee's return to work, and will create a Plan in keeping with the above.

Design of Public Spaces

The Company will meet applicable design standards when building or making major modifications to public spaces, including:

- Ensuring its workspaces and washrooms have automatic door openers to assist persons with mobility challenges.

We will also put reasonable procedures in place to prevent service disruptions to accessible parts of these public spaces and to deal with temporary disruptions when accessible elements required under applicable design standards are not in working order.

In the event of a service disruption, the Company will notify the public of the service disruption and any alternative means of access that may be available.

Contact Information

For more information about this accessibility policy and plan, including if you would like to make a request under this accessibility policy and plan, please contact us at:

- **Email:** accessibility@generationcapital.com
- **Verbally by phone:** (416) 681-1177
- **Online:** Accessible feedback form on our website
- **In person:** At our office location during business hours
- **Mail:** 17 Prince Arthur Ave, 3rd Floor, Toronto, ON M5R 1B2

Accessible formats of this document are also available for free upon request.

Administration

This policy will be interpreted and applied in a manner consistent with the Company's obligations under Applicable Legislation. Subject to compliance with Applicable Legislation, the Company may exercise its discretion to administer, interpret, modify or amend this policy. For the avoidance of any doubt, the Company will exercise its discretion pursuant to this policy in compliance with the requirements of Applicable Legislation.

Last revision: January 2026