

Purpose

This Policy sets out Virox Technologies Inc.'s ("Virox" or "the Company") commitment to providing an accessible, inclusive, and barrier-free environment for employees, applicants, customers, visitors, and other individuals who interact with the Company.

The purpose of this Policy is to support compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, the *Integrated Accessibility Standards Regulation*, and the *Ontario Human Rights Code* by establishing a framework to identify, remove, and prevent barriers to accessibility and to provide accommodation to individuals with disabilities up to the point of undue hardship.

Statement of Organizational Commitment

Virox is committed to ensuring equal access and participation for people with disabilities and to treating people with disabilities in a way that respects their dignity and independence.

The Company is committed to inclusion and to meeting the needs of people with disabilities in a timely manner by identifying, removing, and preventing barriers to accessibility and by meeting its obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA") and other applicable accessibility laws.

The Company is also committed to meeting its current and ongoing obligations under the *Ontario Human Rights Code* and to providing accommodation for individuals with disabilities up to the point of undue hardship, as required by law.

The Company recognizes that compliance with the AODA and its accessibility standards does not substitute or limit its obligations under the *Ontario Human Rights Code* or obligations to people with disabilities under any other applicable law.

The Company is committed to providing accessible customer service and to providing goods, services, and facilities in a manner consistent with the principles of dignity, independence, integration, and equal opportunity for people with disabilities.

Training

Virox provides training to all employees and associates on accessible customer service, the Information and Communications Standard, the Employment Standard, and the requirements of the *Ontario Human Rights Code* as they relate to persons with disabilities. Training is provided during onboarding and as soon as practicable when roles change or when policy or legislative updates occur.

The Human Resources Department maintains records of accessibility training, including the dates on which training was provided, the number of individuals trained, and the names of those who received the

training.

Accessibility training is tailored to the individual's role and includes the following topics:

- Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards;
- Policies related to the Customer Service Standards;
- How to interact and communicate with people with various types of disabilities;
- 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 equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities; and
- What to do if a person with a disability is having difficulty accessing the Company's goods, services or facilities.

In addition, training is provided to:

- All persons who participate in developing the Company's policies; and
- All other persons who provide goods, services or facilities on behalf of the Company.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing goods, services, or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services and facilities. These measures will be developed in consultation with the affected persons to ensure access is provided in a respectful and appropriate manner.

The Company ensures staff are trained and familiar with various assistive devices that may be provided or used by customers or staff with disabilities while accessing our goods, services or facilities. Training on the use of assistive devices will be provided via live demonstrations or videos when possible.

Communication

Virox communicates with people with disabilities in ways that consider their disability by consulting with them on an individual basis to determine the most suitable accessible format or communication support for their needs. This may include the following:

- Plain language and clear, concise wording
- Speaking clearly and at a pace appropriate to the individual
- Offering information in writing, by telephone, by email, or in person

- Using larger print or other accessible print formats where appropriate
- Providing electronic text that can be read by screen readers or text-to-speech tools
- Reading information aloud on request
- Allowing extra time for communication and confirming understanding
- Communicating through a support person where appropriate and with the individual's consent
- Using captioned video, written transcripts, or other communication supports where available

Service Animals

Virox welcomes people with disabilities and their service animals.

When a service animal cannot be easily identified as such, staff may ask for documentation (i.e., letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

Service animals are allowed on the parts of the premises that are open to the public and third parties, except in the following restricted areas where access is limited due to health, safety, operational and regulatory requirements, including obligations under the *Occupational Health and Safety Act* and applicable workplace safety protocols. Restrictions in these areas are also necessary to protect the safety of the animal and/or to maintain the integrity of test results:

- The Manufacturing Plant
- The Warehouse
- The Lab (including the microbiology lab)

If service animals cannot be permitted due to other laws, or other health and safety considerations, the Company will take the following measures to ensure people with disabilities can access goods, services or facilities:

- explain why the service animal is excluded; and
- consult with the person who uses a service animal to identify and provide another appropriate and mutually agreed upon method to provide goods, services or access to facilities.

Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on parts of the premises that are open to the public and third parties. These individuals will be required to wear all necessary Personal Protective Equipment (PPE). They may also be required to complete safety training and sign a confidentiality agreement.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers or staff with disabilities, Virox will notify customers and staff promptly.

Notices may be posted at all public entrances and service counters on Company premises. Email alerts may also be sent if appropriate.

Notices will include the following details:

- The reason for the disruption
- Anticipated length of time
- A description of alternative facilities or services, if available

In an emergency, advance notice may not be possible.

Feedback Process

Virox welcomes feedback on how it provides accessible customer service. Customer and staff feedback helps to identify barriers and respond to concerns. Feedback may be provided to the Accessibility Coordinator in person, via telephone, email or in writing to:

Accessibility Coordinator
Virox Technologies Inc.
2770 Coventry Rd.
Oakville, ON L6H 6R1
T. 905.813.0110 ext. 212
E. HR@virox.com

The Accessibility Coordinator will respond within seven (7) business days, either in writing, in person, by e-mail or telephone acknowledging receipt of feedback. The Accessibility Coordinator will work with the

appropriate departments and/or individuals to provide information in accessible formats, upon request.

Notice of Availability of Documents

The Company notifies the public that documents related to accessible customer service are available on request through the following locations or methods:

- Online at: <https://virox.com/policies/>
- In person, by signage posted at reception

The Company will provide these documents in an accessible format or with communication support on request. The Company will consult with the person making the request to determine a suitable format or communication support and will provide it in a timely manner at no additional cost.

Self Service Kiosks

The Company leverages a self-service kiosk at reception to check visitors in and out of the facility. When updating or upgrading this kiosk, accessibility will be considered. Live human support is available during regular business hours.

Information and Communications

The Company communicates with people with disabilities in ways that take their disability into account. On request, the Company will provide information about the organization and its services, including public safety information, in accessible formats or with communication supports in a timely manner, taking into account the person's accessibility needs due to disability, and at no extra cost.

The Company will consult with the person making the request to determine a suitable accessible format or communication support. If the Company determines that information or communications cannot be converted into an accessible format, it will provide the person making the request with an explanation and a summary of the information or communications, where possible.

The Company notifies the public about the availability of accessible formats and communication supports through this Policy and on its website.

The Company also complies with internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Employment

The Company notifies employees, job applicants and the public that accommodations are available during

the recruitment process on request, by specifying same in job postings, and on the careers section of the website.

The Company notifies job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. When accommodations are requested, the Company consults with the applicants and provides or arranges for suitable accommodation.

Successful applicants are notified of policies for accommodating employees with disabilities when offers of employment are made.

Staff are notified that supports are available for those with disabilities as soon as practicable after they begin their employment. The Company's performance management, career development and redeployment processes consider the accessibility needs of all employees.

Updated information is provided to employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to a disability.

The Company consults with employees when arranging for the provision of suitable accommodation in a manner that considers the accessibility needs pertaining to disability. The Company also consults with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed to perform the employee's job; and
- b) information that is generally available to employees in the workplace.

Where needed, the Company will also provide individualized workplace emergency response information when an employee's 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. With the employee's consent, workplace emergency information will also be provided to the designated person aiding the employee during an emergency. This information is provided as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

The Company will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

Where the Company uses artificial intelligence in managing the employment relationship, including in recruitment, onboarding, scheduling, training, performance management, career development, promotion, redeployment, return-to-work planning, or other employment-related processes, it will take reasonable steps to help ensure that such use supports accessibility, removes barriers, and does not result in inequitable treatment of candidates and/or employees with disabilities. Accessibility needs,

accommodation obligations, and the need for appropriate human judgment will be considered in the design, implementation, and use of such tools and processes.

The Company will continue to review and improve its practices for the use of artificial intelligence in employment-related contexts to support equitable and accessible outcomes for people with disabilities, including by identifying barriers, addressing concerns, and updating processes, training, and safeguards as appropriate.

Individual Accommodation Plans & Requesting Accommodations

Employees who require accommodation are encouraged to notify Human Resources as soon as possible so that the accommodation process can begin.

Individuals who require accommodation for a disability or another ground protected by the Ontario *Human Rights Code* must submit a request for accommodation to the Human Resources Department via email.

To support the accommodation process, the Company may request reasonable medical or other supporting information necessary to understand the employee's functional limitations and accommodation needs, the anticipated duration of the accommodation (where applicable), and any restrictions or limitations relevant to the accommodation request. This information will be handled confidentially and shared only with those who need it to support the accommodation process or to meet legal, health and safety, or operational requirements.

Employees are expected to cooperate in the accommodation process in good faith, provide information reasonably required to support the request, and promptly advise the Company of any changes that may affect their accommodation needs.

Where appropriate, an individual accommodation plan may include information regarding accessible formats, communication supports, individualized workplace emergency response information, and/or any other accommodations that have been approved to support the employee in the workplace.

Return to Work Process

The Company is committed to supporting employees in a safe and timely return to work following work-related and non-work-related medical and/or disability-related leaves of absence.

Human Resources will coordinate the return-to-work process with the employee and may request reasonable medical or other supporting information where appropriate. Information collected to support return-to-work planning will be handled confidentially and shared only with those who need it to support the accommodation process or to meet legal or operational requirements. The employee will be involved in determining suitable accommodations and is expected to cooperate in the process.

Reviewing Individual Accommodation Plans

Individual accommodation plans will be reviewed at least annually and more often if needed based on the individual's circumstances and accommodation requirements. With the employee's consent, the Company may seek advice from a specialist where the accommodation request raises issues beyond the Company's expertise.

Individual accommodation plans and accessibility needs will be reviewed and considered when managing employee performance to help ensure that relevant accommodations are in place and reflected in the discussion and assessment.

Individual accommodation plans and accessibility needs will also be reviewed and considered to help ensure that employees with disabilities have equitable access to training, professional development, career development, and advancement opportunities.

If the Company chooses to use redeployment as an alternative to layoffs when a particular job or department has been eliminated, the accessibility needs and skills of its employees with disabilities will be considered to determine if alternative work within the organization is available and can be offered.

Denied Requests and Appeal Process

The Company will make every reasonable effort possible to accommodate disability and other Human Rights Code-related requests for accommodations up to the point of undue hardship.

Requests for accommodation may be denied if the employee requesting accommodation refuses or fails to provide the necessary information required to develop the accommodation plan.

Should an accommodation request be denied or an alternative offered by the Company be refused, the employee requesting the accommodation will be informed of the reasons for the decision and their right to request a review of the decision. The employee may submit a written request for reconsideration to the Human Resources department.

Design of Public Spaces

The Company will meet accessibility laws when building or making major changes to public spaces.

We will put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

Revisions to this Policy

The Company is committed to developing accessibility and accommodation policies in a manner that respects and promotes the dignity and independence of persons with disabilities. No changes will be made to this Policy without considering the impact on persons with disabilities.



Accommodation & Accessibility Policy

Any Company policy that does not respect and promote the dignity and independence of persons with disabilities will be reviewed and, where appropriate, modified or removed.

The Human Resources Department will review this Policy as needed based on feedback and legal or operational changes. Updated versions of the Policy will be made available on the Company’s website and provided in alternate formats on request.

Responsibility for Policy Enforcement & Consequences of Policy Violations

The Human Resources Department is responsible for the administration and interpretation of this Policy, and all employees, managers, and supervisors are expected to support compliance with its requirements in the course of their work. Any employee who becomes aware of conduct that may be inconsistent with this Policy is expected to report the matter to their manager, Human Resources or their ELT representative, so that it can be reviewed and addressed appropriately.

Failure to comply with this Policy, including any failure to fulfill accessibility and accommodation obligations or any act that undermines the dignity, independence, integration, or equal opportunity of persons with disabilities, may result in corrective action up to and including disciplinary action, termination of employment or engagement, as appropriate in the circumstances. The Company may also take any additional steps it considers necessary to address non-compliance and to meet its legal obligations.

| Employee Policy and Procedure Review and Acknowledgement | | | |
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| By signing below, I acknowledge that I have read and understood Virox Technologies Inc.’s Accessibility & Accommodation Policy. I agree to adhere to this policy and understand that if I violate this Policy, I may face disciplinary action, up to and including termination of employment, where appropriate. | | | |
| Employee Name (please print) | | Employee Signature | |
| Date Signed: | | Department | |