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Integrated Accessibility Standards Regulation Policy

Purpose

The purpose of this True Religion Brand Jeans Integrated Accessibility Standards Regulation Policy (the “Policy”) is to set out how True Religion Brand Jeans achieves and will achieve accessibility through meeting the requirements of Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (the “IASR”).

The IASR establishes the accessibility standards and compliance timeframes for each of the following: information and communications, employment, transportation and the design of public spaces.

The requirements in the standards set out in the IASR are not a replacement or a substitution for the requirements established under the *Human Rights Code*.

This Policy applies to all divisions of True Religion Brand Jeans in Ontario, Canada.

This Policy is not intended to replace or supersede the True Religion Brand Jeans Accessible Customer Service Policy.

This Policy will be reviewed and amended, as required, if and when additional accessibility related regulations are enacted by the Government of Ontario and when changes are made to the legislative framework governing accessibility.

This Policy is publicly available on the Company’s website and will be provided in an accessible format upon request.

Statement of Organizational Commitment

True Religion Brand Jeans is committed to meeting the objectives and requirements outlined in the IASR under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the AODA.

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Policy

Part 1 General

1.1 Multi-Year Accessibility Plan and Accessibility Reports

- True Religion Brand Jeans has established, implemented, and will maintain a Multi-Year Accessibility Plan. The Multi-Year Accessibility Plan outlines the True Religion Brand Jeans strategy to prevent and remove barriers and meet the requirements under the IASR.
- An abridged version of the Multi-Year Accessibility Plan is posted on the Company website and will be provided in an accessible format upon request.
- The Multi-Year Accessibility Plan will be reviewed and updated at least once every 5 years.
- True Religion Brand Jeans shall file an accessibility report with the Province, as outlined by IASR requirements.

1.2 Training

- True Religion Brand Jeans provides training to employees, volunteers and other staff members on the requirements of the accessibility standards in the IASR and on the Ontario *Human Rights Code* as it relates to persons with disabilities. Training will be provided as soon as is feasible to new employees. Training is provided in a way that best suits the duties of employees, volunteers and other staff members. The Company maintains a record of the individuals who have completed the training.

Part 2 Accessible Information and Communications Standards

2.1 Accessible Emergency Information

- Emergency procedures, plans or public safety information that is publicly available, shall be provided in an accessible format or with appropriate communication supports, as soon as possible, upon request.

2.2 Feedback Process

- True Religion Brand Jeans has a process in place to receive and respond to customer feedback and will take steps to ensure those processes are accessible to persons with disabilities. True Religion Brand Jeans will provide or arrange for the provision of accessible formats and communication supports as soon as possible upon request. Customers are notified regarding the availability of accessible formats and communication supports on the Company website.
- Nothing in this section detracts from the commitments in the True Religion Brand Jeans Accessible Customer Service Policy.

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2.3 Accessible Formats and Communication Supports

- True Religion Brand Jeans will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities at a cost that is no more than the regular cost charged to other persons and in a timely manner (as soon as possible) that takes into account the person's accessibility needs due to disability.
- True Religion Brand Jeans will consult with each person making a request in determining the suitability of an alternative format or communication support
- Customers are notified on the Company website about the availability of accessible formats and communication supports.
- Note that IASR does not apply to product and product labels, unconvertible information and communication, and information that True Religion Brand Jeans does not control directly or indirectly through a contractual relationship. In the event the Company determines it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available, the Company will provide the person that requires the information an explanation as to why the information or communications are unconvertible.

2.4 Accessible Websites and Web Content

- The Company shall make its internet website and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA. By January 1, 2021 all internet website and web content published after 2012 will conform to WCAG2.0 Level AA to the extent practicable other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions).
- Note that WCAG2.0 requirements only apply to websites, web content and web based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible, including considering the availability of commercial software or tools or both.

Part 3 Accessible Employment Standards

- The Accessible Employment Standards apply to all paid employees. True Religion Brand Jeans will inform employees of the policies and changes in policies used to support employees with disabilities throughout the employment life cycle.

3.1 Recruitment, Assessment, Selection

- True Religion Brand Jeans will specify that accommodation is available for applicants with disabilities in its recruitment processes on the website and on job postings.
- True Religion Brand Jeans will inform internal and external 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.

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- If a selected applicant requests an accommodation, the Company will consult with the applicant and provide or arrange for the provision of a suitable accommodation, having regard for the applicant's accessibility needs.
- When making an offer of employment, True Religion Brand Jeans will notify the successful applicant of the policies for accommodating workers with disabilities at the time of the offer and as soon as possible after the new employee begins work (during the orientation session).

3.2 Informing Employees of Supports

- True Religion Brand Jeans will inform employees of the policies used to support employees with disabilities including policies on the provision of job accommodation that take into account the employee's accessibility needs.
- The information will be provided to new employees as soon as possible after they begin their employment.
- Updated information will be provided to employees whenever there is a change to existing policies on the provision of job accommodations.

3.3 Accessible Formats and Communication Supports for Employees

- When requested by an employee, True Religion Brand Jeans will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job and also for information generally available to employees in the workplace. True Religion Brand Jeans will consult with the employee making the request in determining the suitability of an accessible format or communication support.

3.4 Individualized Workplace Emergency Response Information

- True Religion Brand Jeans provides individualized workplace emergency response information to employees who have a disability, if the disability is such that individualized information is necessary and True Religion Brand Jeans is aware of the need for accommodation due to the disability.
- If an employee requires individualized workplace emergency assistance, True Religion Brand Jeans, with the employee's consent, provides the workplace emergency response information and plan to the person designated to provide assistance to the employee.
- Individualized workplace emergency response information will be reviewed when an employee moves to a different location within the organization, when the employee's overall accommodation needs or plans are reviewed, and when True Religion Brand Jeans reviews its general emergency response policies.

3.5 Documented individual accommodation plans

- True Religion Brand Jeans has a written process for the development of an Individual Accommodation Plan (IAP) for employees with disabilities. In accordance with the IASR, the process includes:

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- 1) the manner in which an employee requesting accommodating can participate in the development of the individual accommodation plan;
- 2) the means by which the employee is assessed on an individual basis;
- 3) 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;
- 4) the manner in which the employee can request the participation of a workplace representative in the development of the accommodation plan;
- 5) the steps taken to protect the privacy of the employee's personal information;
- 6) the frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- 7) if an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee;
- 8) the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans shall: if requested, include any information regarding accessible formats and communications supports provided; if required, include individualized workplace emergency response information; and identify any other accommodation that is to be provided.

3.6 Return to work

- True Religion Brand Jeans will develop a written return to work process for employees who have been absent from work due to a disability and require disability-related accommodation to return to work. The return to work process:

- 1) outlines the steps the Company will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and
- 2) uses documented IAPs as described above.

3.7 Performance Management, Career Development, Advancement & Redeployment

- True Religion Brand Jeans shall take into account the accessibility needs of employees with disabilities and IAPs in its performance management processes, when providing career development and advancement opportunities, and when considering redeployment of employees with disabilities.