

INTEGRATED ACCESSIBILITY STANDARDS REGULATION : STATEMENT OF COMMITMENT, POLICY AND PLAN

ONTARIO STORES ONLY

This policy and plan formalizes Bath and Body Works' commitment to accessibility, and outlines those steps that Bath and Body Works will take to remove barriers and improve opportunities for people with disabilities through compliance with the Integrated Accessibility Standards Regulation (the "Integrated Standard").

STATEMENT OF COMMITMENT:

Bath and Body Works is committed to treating all people in a way that allows them to maintain their dignity and independence. Bath and Body Works believes in integration and equal opportunity, is 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 the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

POLICY AND PLAN:

General:

- Bath and Body Works provides training on the requirements of the Integrated Standard and on the Ontario Human Rights Code as it relates to people with disabilities. Bath and Body Works takes the following steps to ensure that training is provided to all of our employees, volunteers and those persons who develop our policies and provide goods, services of facilities on our behalf:
 - develops and consolidates training materials that address the requirements of the Integrated Standard, including information about achieving accessibility by 2025 and on the disability-related regulations obligations under the *Human Rights Code*;
 - reviews the duties of those individuals that require training, and tailors the training to be appropriate for such duties;
 - delivers the training via a method that is appropriate for the audience and the needs of Bath and Body Works;
 - keeps a record detailing those employees that were trained and when; and
 - ensures that new employees are trained as soon as practicable after being hired and when Bath and Body Works' accessibility policies change.
- At this time, Bath and Body Works does not utilize kiosks. However, should the use of kiosks become a part of Bath and Body Works' business in the future, we will ensure that our employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.

Information and Communication:

Bath and Body Works is committed to meeting the communication needs of people with disabilities.

- Bath and Body Works ensures that our existing processes for receiving and responding to feedback are accessible to people with disabilities upon request.
- Bath and Body Works ensures that, upon request, we provide or arrange for the provision of publicly available information that is in respect of our goods, services or facilities in an accessible format and at a cost that is not more than that charged to others by:
 - consulting with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and Bath and Body Works' capability;
 - providing the accessible format or communication support in a timely manner and at no additional cost; and
 - notifying the public about the availability of accessible formats and communication supports.
- Bath and Body Works has enacted a process to provide its customers and clients with publicly available emergency procedures, plans or public safety information in an accessible way, as soon as practicable upon request.
- Bath and Body Works is committed to meeting the communication needs of people with disabilities, and undertakes significant effort in the hopes that all of its new websites and new web content on those sites conform with WCAG 2.0, Level AA. Online content is always changing, however, and compliance with WCAG standards is therefore a continuous process. We monitor our website regularly for compliance with the WCAG standards and we diligently work to quickly rectify errors or omissions when they are identified.

Employment:

- Bath and Body Works is committed to fair and accessible employment practices. We:
 - notify the public and our staff that we will accommodate people with disabilities during the recruitment process, either through our website, via a recruiter or the applicable job posting, as applicable;
 - notify 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 utilized;
 - consult with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and
 - notify the successful applicant of Bath and Body Works' policies for accommodating our employees with disabilities.
- Bath and Body Works informs our employees of the policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into

account an employee's accessibility needs due to disability, by:

- consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance, and how such accommodation may be provided; and
 - providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.
- Bath and Body Works has provided individualized workplace emergency response information to our employees with disabilities, if the disability is such that the individualized information is necessary and Bath and Body Works is aware of the need for accommodation.
- Bath and Body Works has developed and put in place a process for the creation of individual accommodation plans for those employees who have been absent from work due to a disability. This process shall be implemented by:
- considering how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
 - establishing where the plans will be stored and what steps will be taken to protect the privacy of employee information; and
 - determining when and how the individual accommodation plans will be reviewed and updated.
- Bath and Body Works has developed and put in place a documented return to work process for those employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. This process outlines the steps that Bath and Body Works takes to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans.
- Bath and Body Works takes into account the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management process. This is achieved by:
- reviewing an individual's accommodation plan to understand their needs and determine whether it should be adjusted to improve job performance;
 - providing performance-management related documents in accessible formats; and
 - providing informal and formal coaching and feedback in a manner that takes into account an employee's disability.
- Bath and Body Works takes into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

Design of Public Spaces

At the present time, Bath and Body Works does not plan on developing or redeveloping any of its public spaces, as defined in the Design of Public Spaces Standard. However, should it choose to do so, this policy and plan will be revised to include the requirements thereunder and how we will achieve compliance.

Going Forward:

Bath and Body Works will endeavour to identify and remove accessibility barriers going forward.

For More Information:

For more information on this accessibility policy and plan, please contact Bath and Body Works at:

Telephone: 614.415.7000; For relay service, please dial 711

Email: generalcounsel@lb.com; Attn: VP - Legal Marketing, Regulatory and Retail Operations

Accessible formats of this document are available free upon request from Bath and Body Works at:

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