

## **ALLISTER GROUP INC.**

### **PART I: PRIVACY POLICY**

The Allister Group Inc. (“**Allister**”) takes your privacy seriously and are committed to safeguarding your personal information. This Privacy Policy (the “**Policy**”) outlines how we collect, use, disclose, and protect your information, and is intended to ensure that your privacy is respected in all interactions with us, whether online or offline.

This Policy applies to Allister Group Inc. and to all entities authorized by Allister or using the Allister trademark(s) under license. It outlines our practices concerning the handling of your personal and non-identifiable information.

For the purposes of this Policy, “personal information” refers to information that identifies an individual. “Non-identifiable information” refers to information that cannot reasonably be connected to an identifiable individual.

#### **1. Collection of Personal Information**

Allister may collect personal information directly from individuals who voluntarily submit such data through various channels, including online and in-person interactions. This may occur when individuals complete contact forms, surveys, questionnaires, contest entries, registration documents, or engage in transactions with us. The information collected may include (i) names, mailing addresses, telephone numbers, and email addresses; (ii) demographic characteristics such as age and gender; (iii) information about household composition and preferences; and (iv) transaction details and purchase history.

#### **2. Use of Personal Information**

Allister uses personal information for several purposes. These include (i) maintaining contact and communication with individuals; (ii) developing a better understanding of individual needs and preferences; (iii) offering and promoting relevant products, services, and special offers that align with those needs or preferences; (iv) providing requested products or services and fulfilling ongoing commitments to our customers; and (v) managing and processing transactions to completion.

This information also helps Allister enhance its offerings by tailoring them to the specific interests of our customers. Allister may contact individuals’ email or standard mail for any of the purposes outlined above.

#### **3. Disclosure and Sharing of Personal Information**

Allister does not sell, rent, or trade personal information. Allister will disclose your personal information only under the following circumstances: (i) where consent has been provided, either expressly or as reasonably implied at the time the information was provided; (ii) where the law allows or requires disclosure, such as to comply with legal obligations or court processes, or to provide aggregate statistics to industry bodies; (iii) where disclosure is made to affiliates or related entities of Allister, provided the disclosure is solely for the purposes described in this Policy, and those entities agree to use the information only as permitted herein; (iv) where third-party service providers, such as consultants, professional advisors, marketing agencies, service providers or data processors, require the information to perform duties on our behalf, and such third parties agree to use the information only for those limited purposes; or (v) in

the context of a merger, acquisition, or sale involving Allister, where personal information may be considered part of the assets transferred.

#### **4. Data Retention**

Allister retains personal information only as long as it is necessary to achieve the purposes described in this Policy or as required by law. Once personal information is no longer needed, Allister will ensure that it is either securely destroyed or anonymized in a manner that prevents re-identification.

#### **5. Collection of Aggregate and Anonymous Data**

Allister also collects non-identifiable information to help improve its website and services. This information may be used to (i) analyze how users interact with our website and identify areas for improvement; (ii) evaluate the overall effectiveness of website content and marketing materials; (iii) develop more relevant programs, features, and content for site visitors; and (iv) conduct statistical analysis of audience demographics and behaviors.

Allister may share aggregate, anonymized information with sponsors, service providers, advertisers, business partners, and financial institutions. Such information may include (i) the number of visitors to our site, (ii) the general characteristics of those visitors, and (iii) the number of times certain content or advertisements have been viewed or interacted with. At no time will personally identifiable information be disclosed as part of these aggregated data sets.

#### **6. Third-Party Websites**

Allister's website may include links to external websites operated by third parties. Allister does not control and is not responsible for the privacy policies or practices of those third parties. Individuals who access those websites are encouraged to (i) review the privacy statements posted on those sites and (ii) make informed decisions about whether to provide personal information based on the respective privacy practices of each site.

#### **7. Safeguarding of Personal Information**

Allister employs physical, administrative, and technical safeguards to protect personal information. This includes (i) storing personal data in secure, access-controlled environments within the Greater Toronto Area; (ii) implementing security technologies to prevent unauthorized access, loss, or misuse; and (iii) ensuring that only employees with a legitimate business need have access to personal information.

While Allister takes significant measures to protect your information, please be aware that (i) data transmission over the internet may be intercepted by unauthorized third parties and (ii) Allister cannot guarantee the complete security of information sent online. As such, Allister assumes no liability for the interception or misuse of personal information transmitted through digital channels.

Allister's services are designed for use by a general audience and are not directed toward or intended for individuals under the age of 13. We do not knowingly gather personal information from anyone under the age of 13. If we become aware that we have inadvertently collected personal data from a child under 13 without the verified consent of a parent or legal guardian, we will take immediate steps to remove that information from our records.

If you suspect that we may have collected personal information from a child under 13, we encourage you to notify us using the contact details provided in this section.

## **8. Accessing and Updating Your Information**

Individuals have the right to access the personal information Allister stores about them and to request corrections or updates. Allister is committed to maintaining accurate and up-to-date information and encourages individuals to (i) contact our Privacy Officer if they believe their personal information is incorrect, incomplete, or outdated; and (ii) submit any requests for access or amendment in writing. These requests should be directed to:

**David Kim, Privacy Officer**  
**Allister Group Inc.**  
**8500 Leslie Street, Suite 520 Markham, Ontario L3T 7M8**  
**Email: [david.kim@theallistergroup.com](mailto:david.kim@theallistergroup.com)**

## **9. How to Report a Complaint**

If you have concerns about how your personal information has been handled, you may contact our Privacy Officer. Upon receipt of a complaint, Allister will (i) initiate an investigation into the matter as promptly as possible; (ii) notify the complainant of the results of the investigation; and (iii) advise of any corrective actions taken or planned in response.

## **10. Managing Communication Preferences**

Individuals always have the choice whether to provide Allister with their personal information. Individuals who wish to withdraw consent or opt out of receiving future marketing communications may do so by (i) contacting our Privacy Officer at the information provided above; or (ii) using the unsubscribe feature included in promotional emails.

Please note that choosing not to provide certain information may (i) limit your ability to complete transactions with Allister; and (ii) restrict your access to promotions, offerings, or features of our services.

## **11. Effective Date and Updates**

This Privacy Policy is effective as of June 1, 2025. Allister reserves the right to make changes to this Policy from time to time. Any updates will be posted on our website, and we encourage you to (i) review the Policy periodically and (ii) contact us with any questions or concerns.

## **PART II: MULTI-YEAR ACCESSIBILITY COMPLIANCE PLAN**

This Multi-Year Accessibility Compliance Plan outlines the strategies and measures Allister Group Inc. is committed to implementing in order to enhance accessibility and create equal opportunities for individuals with disabilities. The initiatives described herein are designed to meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) and to remove barriers for people with disabilities throughout our organization.

### **1. Commitment to Inclusive Practices**

Allister is dedicated to treating every individual in a manner that preserves their dignity and independence. We believe in the values of inclusion, accessibility, and equal opportunity. Our organization commits to

meeting the needs of persons with disabilities promptly by identifying, preventing, and eliminating barriers to accessibility across our workplace and service offerings.

## **2. Emergency Response Accessibility**

Allister is committed to providing publicly available emergency information in formats that are accessible upon request. In addition, we will ensure that (i) employees with disabilities who may need assistance in an emergency situation are provided with tailored emergency response plans, and (ii) these plans are developed in consultation with the employee where required.

## **3. Accessibility Training and Awareness**

Allister will provide training to all employees, volunteers, and other personnel on applicable accessibility laws and the Ontario Human Rights Code as it relates to individuals with disabilities. This training will (i) be appropriate to the roles and responsibilities of the individual receiving the training, and (ii) be delivered in a manner and timeline that ensures effectiveness.

## **4. Accessible Self-Service Technology**

Should Allister acquire self-service kiosks in the future, we will ensure that employees responsible for their procurement, design, or implementation are trained to (i) consider accessibility requirements, and (ii) select or configure kiosks in a manner that accommodates users with disabilities.

## **5. Accessible Communication Standards**

### **(a) Communication and Interaction**

Allister is committed to ensuring that communication with individuals who have disabilities is respectful, clear, and adapted to their specific needs in accordance with the AODA Integrated Accessibility Standards (the “IAS”). When interacting by phone, email, in writing, or in person, we will (i) use communication practices that are sensitive to the nature of the individual’s disability, (ii) follow recognized etiquette for appropriate and inclusive language, and (iii) offer alternative methods of communication. Employees and others to whom this policy applies will receive training to help them understand how to effectively and respectfully communicate with persons who have a range of disabilities.

### **(b) Accessible Customer Information**

Allister is committed to providing customer-facing documents in alternative formats upon request. This includes, but is not limited to, brochures, agreements, homeowner manuals, and invoices. Upon receiving a request, we will work directly with the customer to determine the most suitable format, which may include (i) large print, (ii) electronic versions, (iii) verbal summaries, or (iv) another reasonable format that aligns with the individual’s accessibility needs.

### **(c) Use of Assistive Devices**

Customers who require assistive devices are welcome to use them to access our goods and services. Employees and contractors will (i) be familiar with the types of devices commonly used by persons with disabilities, (ii) follow respectful practices that include not touching or handling assistive devices without permission, and (iii) be aware of any assistive equipment that Allister may provide at its locations, such as magnifiers or writing aids.

#### (d) Service Animals

Individuals with disabilities who are accompanied by a service animal are permitted to access all areas of Allister's premises where the public is normally allowed, unless prohibited by law. In cases where service animals are legally excluded, we will (i) work collaboratively with the individual to identify other reasonable means of providing the same service, such as arranging a meeting at an alternative site or communicating electronically, and (ii) take steps to minimize any disruption or inconvenience.

#### (e) Support Persons

Customers with disabilities are entitled to be accompanied by a support person on our premises. Allister will (i) ensure that individuals have full access to their support persons while receiving services, (ii) post clear notice in advance of any admission fees that may apply to support persons, and (iii) in exceptional circumstances require a support person to accompany a customer, provided that such a decision is justified and explained to the individual and where health and safety considerations reasonably warrant such support.

#### (f) Temporary Disruptions in Accessibility

In the event of a temporary disruption to services or facilities that people with disabilities rely on, Allister will (i) provide timely notice that includes the reason for the disruption, its expected duration, and alternative options available, if any; and (ii) ensure that notices are placed in accessible and prominent locations such as entrances, service counters, or communicated through other reasonable channels depending on the context.

#### (g) Staff Training

Allister ensures that all employees, volunteers, and contractors who interact with the public or are involved in the development of public-facing policies receive accessible customer service training. The training will (i) be provided to new staff as early as reasonably possible, (ii) be repeated when relevant policies or procedures are updated, and (iii) be customized based on the individual's job duties.

The training will cover (i) the objectives of the Accessibility for Ontarians with Disabilities Act and the Integrated Accessibility Standards; (ii) the requirements of the Customer Service Standard; (iii) techniques for interacting with individuals with various disabilities; (iv) how to provide service to customers who use assistive devices, service animals, or support persons; (v) awareness of assistive devices made available by Allister; (vi) steps to take when a person with a disability is experiencing difficulty accessing services; and (vii) Allister's own accessibility-related policies and practices.

Training records will be maintained and will include (i) the number of individuals trained, (ii) the dates on which the training was completed, and (iii) the names of those trained, solely for internal record-keeping in accordance with applicable privacy laws such as the Personal Information Protection and Electronic Documents Act (PIPEDA).

#### (h) Feedback and Complaints

Allister welcomes feedback regarding how services are delivered to individuals with disabilities. Comments or complaints may be submitted (i) in person, (ii) by telephone, (iii) electronically, (iv) in writing, or (v) through any other method that is reasonable and accessible to the individual. We are committed to responding to all feedback promptly and to using it to improve our practices wherever possible.

### **6. Equal Opportunity Employment Practice**

Allister is committed to inclusive employment practices and will ensure that individuals with disabilities are accommodated throughout recruitment, hiring, and ongoing employment.

We will take steps to ensure that (i) all job applicants are notified of the availability of accommodation during the hiring process, and (ii) this information is communicated clearly by Hiring Managers or Human Resources, including through job postings where applicable.

Allister will also develop a framework for individual accommodation plans and return-to-work procedures for employees who have been absent due to disability. This framework will (i) outline how employees may participate in the process; (ii) explain how needs will be assessed; (iii) describe how external professionals may be involved, if required; (iv) establish how employee privacy will be maintained; (v) define how and when the plan will be reviewed; (vi) clarify how employees will be informed of decisions, including any denied accommodations; and (vii) describe how the finalized plan will be made available to the employee.

To integrate accessibility needs into performance management, career development, and redeployment processes, Allister will (i) ensure that all applicable policies supporting employees with disabilities are communicated internally, and (ii) factor accessibility considerations into the design and delivery of relevant programs and evaluations.

To proactively address other accessibility barriers, Allister will (i) conduct ongoing reviews of policies and procedures, and (ii) implement changes where necessary to remain in compliance with the AODA.

## **7. Public Space Design Accessibility Standards**

Where Allister is involved in the design or major modification of public spaces under its control, it will meet the requirements set out under the AODA Integrated Accessibility Standards. In the event of a service disruption affecting the accessibility of such spaces, (i) we will notify the public of the disruption, and (ii) provide alternatives where available.

## **8. Review and Compliance**

Allister will ensure this policy is reviewed and updated at least once every five years. The first scheduled review will occur no later than June 1, 2030, and subsequent reviews will be completed within the required timeframe.

## **9. Contact for More Information**

For further details about Allister's accessibility plan or to request documents in an accessible format, please contact:

**David Kim, Accessibility Coordinator**  
**Allister Group Inc.**  
**8500 Leslie Street Unit 520**  
**Markham, Ontario L3T 7M8**  
**Email: [david.kim@theallistergroup.com](mailto:david.kim@theallistergroup.com)**