

## FRESHLOCAL SOLUTIONS INC.

### DIVERSITY AND INCLUSION POLICY

Freshlocal Solutions Inc. (the “**Company**”) recognizes and embraces the benefits of having diversity and inclusion on its board of directors (the “**Board**”), senior management, and throughout the organization. Diversity and inclusion are important in order to ensure that the Company has the necessary range of perspectives, experience, and expertise required to achieve its objectives and deliver for its stakeholders.

The Company is committed to cultivating a diverse and inclusive culture and selecting the best individuals to fill the Board, senior management roles, and all other positions in the organization within the Company, free of conscious or unconscious bias and discrimination.

#### **Meaning of Diversity**

“**Diversity**” is any dimension that can be used to differentiate groups and people from one another and includes gender identity, age, language, race, nationality, culture and other ethnic distinctions including Aboriginal peoples and members of visible minorities (each as defined in the *Employment Equity Act* (Canada)), persons with disabilities, sexual orientation, education, regional and industry experience, and expertise.

#### **Application of this Policy to the Board**

The Compensation Committee (the “**Committee**”) is responsible for reviewing and assessing Board size, composition, and effectiveness and for recommending to the Board: (i) the director nominees to stand for election at the next annual meeting of Company shareholders; and (ii) any candidates for appointment to the Board between annual meeting of Company shareholders, as appropriate.

When identifying and considering the selection of candidates for appointment or nomination for election to the Board, the Committee will:

- assess the Board by considering the balance of skills, experience, independence and knowledge on the Board, the Board’s cohesiveness and other factors relevant to its effectiveness;
- consider only candidates who are highly qualified based on their experience, education, expertise, personal skills and qualities, and general and industry-specific knowledge, having regard to the Company’s current and future plans and objectives; and
- select individuals based on merit, against objective criteria, having due regard for the benefits of diversity and inclusion, in order to enable the Board to discharge its duties and responsibilities effectively.

In order to promote the specific objectives of diversity and inclusion on the Board, the selection process for Board appointees and nominees for election will also involve the following steps (including where the Company engages an external recruitment agency to identify and assess candidates):

- ensure that appropriate efforts are made to include women and individuals from other diverse backgrounds in the list of candidates being considered for a Board position; and

- if, at the end of the selection process, no women or individuals from other diverse backgrounds are selected from the list of candidates, the Board must be satisfied that there are objective reasons to support this determination.

The Company believes promotion of diversity and inclusion are best served through careful consideration of all of the abilities and attributes of each individual candidate in light of the needs of the Board without focusing on any particular diversity characteristics.

On an annual basis, the Committee will: (i) review and assess the effectiveness of the Board appointment/nomination process at achieving the Company's diversity and inclusion objectives; and (ii) consider and, if determined advisable, recommend to the Board for adoption, measurable objectives for achieving diversity on the Board. At any given time, the Board may seek to adjust one or more objectives concerning its diversity and inclusion and measure progress accordingly.

### **Application of this Policy to Senior Leadership and the Organization**

The Committee is responsible for: (i) periodically reviewing and making recommendations to the Board with respect to succession planning matters concerning key executive officers; (ii) reviewing the recommendations of all senior management reporting directly to all other officers appointed by the Board; and (iii) working with the Company's Human Resources department and other Board committees, as appropriate, to promote and implement hiring policies that cultivate diversity and inclusion throughout the organization.

It is an objective of this policy that diversity and inclusion be considered in connection with succession planning and the recruitment and appointment of members of the Company's senior management as well as in all other roles throughout the organization.

Accordingly, in order to promote the specific objectives of diversity and inclusion, the Company will:

- implement policies that address impediments to diversity and inclusion in the workplace and review their availability and utilization;
- regularly review the proportion (in percentage terms) of persons at all levels of the Company who are from diverse backgrounds, including women, minorities, and individuals from diverse backgrounds;
- monitor effectiveness of, and continue to expand on, existing initiatives designed to identify, support and develop talented individuals from diverse backgrounds; and
- continue to identify new ways to entrench diversity and inclusion as a cultural priority across all levels of the Company.

On an annual basis, the Committee will (i) assess the effectiveness of the Company's diversity and inclusion objectives and (ii) consider and, if determined advisable, recommend to the Board for adoption, measurable objectives for achieving diversity and inclusion across all levels of the Company. At any given time, the Board may seek to adjust one or more objectives concerning diversity and inclusion and measure progress accordingly.

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*This policy was recommended for approval by the Company's Sustainability and Governance Committee and made effective by the Board of Directors as of April 16, 2021.*