

Integrated Accessibility Standards Policy

This policy, which has been established in compliance with Regulation 191/11, "Integrated Accessibility Standards ("IASR") Regulation" under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA"), aligns with the Company's commitment to treat all employees in a way that respects their dignity and independence.

Commitment

The Company is committed to treating all employees in a way that allows them to maintain their dignity and independence. The Company believes in integration and equal opportunity and are committed to meeting the needs of persons with disabilities and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements in accordance with AODA.

Multi-Year Accessibility Plan

The Company has developed a Multi-Year Accessibility Plan, which outlines the Company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the company's internal and external websites. Upon request, the Company will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

Training Employees

The Company will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities to all its employees.

The training will be appropriate to the duties of the employees. Training will be also provided when any changes are made to the accessibility policies. The Company will keep a record of the training it provides.

1. Information and Communications Standard

The Information and Communication Standard seeks to ensure that persons with disabilities have access to sources of information that many of us rely on every day. The Company will have materials and communications available in formats that are accessible to persons with disabilities.

a. Feedback

The Company will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

b. Accessible Formats and Communication

The Company shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities and will do so in a timely manner that takes into account the individual's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons. The Company shall consult with the person making the request to determine what format or communication support would meet the individual's particular needs. The Company will notify the public and employees about the availability of accessible formats and communication supports.

c. Accessible Websites and Web Content

The Company will ensure that the Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 – Level A except where this is impracticable.

2. Employment Standard

The Company considers accessibility at all stages of the recruitment, assessment, and selection process, including advertising, interviewing, hiring, and starting, regardless of whether the applicants are external or internal to the Company.

a. Recruitment

The Company provides notification about the availability of accommodation for applicants with disabilities during the recruitment processes. This information may be included in the job posting, website or communicated directly to the potential applicants.

When an applicant is selected for an interview, the Company will advise the applicant that accommodation is available. If an accommodation is requested, the Company will work with the applicant to find an appropriate accommodation.

The Company will notify successful applicants about the Company's policies for accommodating employees with disabilities.

The Company will inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as is practicable after commencing employment.

b. Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the Company will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, the Company will consult with the employee making the request.

c. Individual Accommodation Plans

Individual accommodation plans include:

- how the employee requesting accommodation is to participate in developing the plan
- how the employee is assessed on an individual basis
- how the Company can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved
- how the employee can request the participation of a representative in the development of the plan
- steps to be taken to protect the employee's privacy
- how often the plan will be reviewed and updated, and how this will be done
- if the request is denied, how the reasons will be conveyed to the employee, and
- how the plan is to be provided to the individual in an accessible format

d. Emergency Response Information

The Company provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the Company is aware of the need for accommodation due to the individual's disability.

The Company reviews individualized workplace emergency response information,

- when the employee moves to a different location in the Company;
- when the employee's overall accommodation needs or plans are reviewed; and
- When the Company reviews its general emergency response policies.

e. Return to Work

The Company has a documented return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The return to

work process outlines the steps the Company takes to facilitate the employee's return to work and will use the individual accommodation plan as part of the process.

This process, however, does not replace or override any other return to work process created by or under any other applicable law or regulation.

f. Performance Management

Any performance management the Company uses in respect of its employees takes into account the accessibility needs of persons with disabilities, as well as individual accommodation plans.

g. Career Development and Advancement

The Company takes into account the accessibility needs of its employees with disabilities, as well as any individual accommodation plans, when providing career development and advancement opportunities to persons with disabilities.

h. Redeployment

The Company takes into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying persons with disabilities.

Questions

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of Information and Communications, and Employment. If anyone has a question about this policy or would like to obtain this document in an alternate format, please contact Human Resources at:

- Phone: 1-800-663-6331 or 905 602 2700
- Email: <u>hrcanada@radiantdelivers.com</u>