

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

Employment Standard

The Company is committed to ensuring that employment opportunities are fully accessible to job candidates and employees with disabilities. This policy is intended to ensure that the Company advances accessibility in employment for people with disabilities through compliance with the Employment Standard under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

This policy applies to all employees and prospective employees of the Company. Any sections of this policy that relate to job applications and recruitment apply to both internal and external recruitment. This policy does not apply to volunteers or other non-paid individuals.

Accommodation in Recruitment Processes

The Company will ensure that accommodations for applicants with disabilities are available at every stage of our recruitment processes. These could include, but are not limited to:

- publishing job ads in accessible formats, for example, ensuring that job ads on our website can be read by screen-readers for applicants with vision impairments
- holding job interviews in locations that are accessible to applicants using wheelchairs or other mobility aids
- adjusting the format of job interviews or job evaluations to be accessible to applicants with different kinds of disabilities
- allowing a personal support person to attend job interviews with the applicant where this is necessary to allow the applicant to fully participate in the interview
- providing additional time to complete tests or evaluations that are part of the job selection process, or to answer interview questions

The Company will notify the public, through its website and in job ads, that accommodations in the recruitment process are available upon request. For internal job postings, we will notify the employees who are eligible to apply for the job that accommodations in the recruitment process are available upon request.

We will also specifically advise each person who is invited to participate in a job interview or job selection process that accommodations are available upon request regarding the materials and the processes that will be used.

Upon request by a job applicant, the Company will consult with the applicant about their needs related to a disability and will provide accommodations that are reasonably necessary to allow the person to access and fully participate in the job interview or selection process. We will advise each successful candidate of the policies for accommodating employees with disabilities at the time that an offer of employment is made and will give successful candidates an opportunity to review these policies.

Supports and Accommodations

We will ensure that all employees are informed about any policies that are used to support employees with disabilities. We will do this by circulating relevant policies and providing appropriate training to employees as soon as possible after they begin work and whenever our policies change.

Upon request, the Company will ensure that information needed to perform your job, and other information that is generally available to employees in the workplace (such as employment policies and bulletin board announcements), is provided to you in an accessible format or with communication supports. The Company commits to consulting with you to determine what type of accessible format or communication supports you need.

Accessible formats or communication supports can include, but are not limited to providing:

- large-print or Braille formats for employees with vision impairments
- information verbally to employees with vision impairments or with disabilities that impair the ability to process or understand written information
- instructions in written format to employees with hearing impairments or with memory or other impairments that affect the usefulness of verbal instructions

Emergency Response Information

If, as a result of a disability, you would face barriers or require special considerations during a workplace emergency, we will provide you with individualized information regarding how you will be accommodated and assisted in such an event. The Company will consult with you in order to determine an appropriate emergency response plan.

If you believe that you may require individualized emergency response information or an individualized emergency response plan, please speak with your manager. While the Company aims to be proactive in developing individualized emergency response plans, we may not know that you require one unless you tell us.

With your consent, we may provide your individualized emergency response information to an employee selected to assist you in the event of an emergency. This will be done only if you require assistance and if you consent.

All individualized emergency response information and plans will be reviewed whenever:

- you move to a different physical location
- your overall accommodation measures and plans are reviewed
- the Company reviews its general emergency response policies

Individual Accommodation Plans

We will develop, and document in writing, an individual accommodation plan for you if you require accommodation as a result of a disability. At any time during the development of this plan, you have the right to be accompanied by another employee who you choose to assist you. If you require assistance to secure an appropriate representative, please contact your manager. The process for developing an individual accommodation plan is as follows:

1. If you believe that you require accommodation due to a disability, please make a request to your manager.
2. Your accommodation needs will be assessed on an individual basis by:
 - meeting with you at the beginning of the process to discuss your needs

- meeting with you during the development of the individual accommodation plan, as appropriate, to obtain your input into the accommodation measures we are proposing and how these will affect your individual needs
 - if necessary, requesting medical information and documentation from your treating physician or another medical expert or specialist regarding your individual needs, medical restrictions, and your individual prognosis
3. In order to determine whether accommodation is necessary and how an effective plan can be achieved, the Company may require an evaluation by a medical or other expert. In such a case, we will ask for, and expect your cooperation in providing, information from your treating physician. We may provide you with a letter or a Functional Abilities Form to take to your doctor to facilitate the reporting. Requested information will normally be limited to:
- your prognosis
 - any medical limitations requiring accommodation in the workplace
 - whether you are on a treatment plan (but not the details of that plan)
 - whether you are taking any medications that could affect your ability to carry out your job duties, and how (but not the names of any medications)

There may be times when we will need to obtain an expert opinion to assess your accommodation requirements, such as having you attend an independent medical examination or specialist appointment. This often provides us with more appropriate information for developing an accommodation plan. You are expected to cooperate with reasonable requests for expert opinions. We will reimburse you for the cost of any notes, documentation, or evaluations that we require you to obtain under this policy.

The role of your physician in the accommodation process is to provide information about your individual limitations and needs, as well as your prognosis (how long these limitations and needs are expected to last). Your physician's role is not to direct what accommodation looks like or to assess workplace dynamics.

4. We appreciate the sensitivity of medical information and will take steps to ensure confidentiality throughout this process. The measures that we will take to protect the privacy of your personal information may include:
- sharing information within the organization on a strict need-to-know basis
 - maintaining a separate employee file for personal medical information so that private information cannot be seen when your personnel file is reviewed
 - keeping all employee medical information in secure locations
5. Once we have the opportunity to discuss your needs with you and review any necessary medical information, the Company will prepare a draft written individual accommodation plan. The plan will set out, at a minimum:
- the accommodation to be provided
 - the timeline on which accommodation will be implemented
 - information pertaining to accessible formats or communications supports being provided to you, if any

- individualized workplace emergency response information being provided to you, if any
6. We will meet with you to discuss the draft individual accommodation plan and will consider any input and suggestions you may have before the plan is finalized.
 7. The Company values your input and recognizes the importance of your participation in developing an individual accommodation plan; however, we also reserve the right to select the accommodation measure that is least disruptive to our business and that balances your needs with the essential needs of all employees.
 8. If, as a result of a disability, you require the individual accommodation plan to be provided to you in an accessible format, please make a request to your manager.
 9. Once your individual accommodation plan is in place, it will be reviewed at least once per year to ensure that it continues to adequately meet your disability-related needs. The plan may be reviewed more frequently if there is a change (positive or negative) in your medical condition or a change in our business circumstances that could impact the appropriateness of the plan. The nature of the review will depend on the circumstances. For example, the normal annual review may involve only a short discussion between you and your manager to ensure that the plan continues to meet your needs, whereas a review prompted by a change in your medical condition may also involve collecting and reviewing the new medical information and obtaining your input into proposed changes to the plan.
 10. Requests for accommodation will generally be approved, unless we determine based on the medical information we have received that you do not require accommodation, a different form of accommodation may be more appropriate, or it would cause undue hardship to the Company to accommodate you.
 11. If we determine that it is not appropriate to provide you with accommodation, we will provide you with a written summary of our reasons. The summary will be provided in an accessible format upon request.

Return-to-Work Process

If you are absent from work due to a disability and require disability-related accommodations in order to return to work, we will use the following process to facilitate your return to work:

- we will maintain contact with you during your absence to ensure that you remain up to date on developments that you will need to know about upon your return to work
- we will develop a written accommodation plan for you using the processes above
- if supported by your physician, your individual accommodation plan may include a graduated return to work, such as working limited hours or performing limited duties for a period of time and increasing your hours and duties over time
- once your individual accommodation plan has been finalized, you will be expected to report to work and perform the duties set out in it
- if necessary and appropriate, additional training may be provided to you to facilitate your return to work and ensure you are capable of performing the assigned duties

- if at any time you have difficulty completing the work you are assigned as part of your individual accommodation plan, please speak with your manager. Additional medical information may be required.

Performance Management, Career Advancement and Redeployment

The Company will take your accessibility needs and accommodation plan into account:

- before and during any performance management activities, such as performance evaluations, coaching, warnings, or imposing performance improvement plans
- when we make decisions regarding promotions, increased responsibilities, pay increases, or other career advancement opportunities
- when we make decisions regarding your transfer to other departments or jobs within the organization as a result of the elimination of your department or position