

# Accessible Customer Service Policy

## 1. Policy Statement

AccertaClaim Servicorp Inc. (“**Accerta**” or the “**Company**”) delivers industry-leading healthcare plan management to governments and private businesses in Ontario and other Canadian markets. In accordance with the goals of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”), Accerta is committed to excellence in providing services to all Accerta members and members of the public, including those with disabilities. Further, we endeavour to ensure that our Accessible Customer Service Policy and related practices and procedures are consistent with the core principles of dignity, equality of opportunity, integration and independence.

The goal of the AODA is to create a more accessible Ontario by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with a disability. The Customer Service Standard has been established under the AODA to ensure goods and services are, where at all possible, equally accessible to every Ontarian.

## 2. Scope

This policy applies to all of the Company’s operations in Ontario and to all persons who deal with members of the public or other third parties on behalf of the Company, or who are responsible for developing the Company’s policies, including employees, agents, volunteers and contractors of the Company.

## 3. Definitions

For the purposes of this policy:

“Assistive Device” means any device that is designed, made or adapted to assist a person to perform a particular task, including physical or technical aids, such as communication devices, canes, crutches, hearing aids and wheelchairs.

“Barrier” means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This includes a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

“Disability” means:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- (b) a condition of mental impairment or a developmental disability;
- (c) a learning disability, or a dysfunction in one of more of the processes involved in understanding or using symbols or spoken language;
- (d) a mental disorder; or
- (e) an injury or disability for which benefits were claimed or received under the insurance plans established under the *Workplace Safety and Insurance Act, 1997*.

“Service Animal”

includes any animal if,

- (a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- (b) the person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

“Support Person”

means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

“Accessible Formats”

may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities;

“Communication Supports”

may include, but are not limited to, captioning, alternative and augmentative communication supports,

plain language, sign language and other supports that facilitate effective communications;

“Workers”

includes all persons who deal with members of the public or other third parties on behalf of the Company, or who are responsible for developing the Company’s policies, including employees, agents, volunteers and contractors of the Company.

## **4. Providing Services to Persons with Disabilities**

### ***Communicating with Persons with Disabilities***

Accerta strives to communicate with persons with disabilities in ways that take into account both the disability and the person’s preferred method of communication.

The Company can communicate with customers via email, telephone, fax, meetings (either in person or via phone or video conferencing), via the Company’s website, and via Teletypewriter (TTY) phone. Details regarding the TTY phone are posted on Accerta’s website. The Company recognizes that not all customers will wish to communicate in the same manner.

All workers will receive training on how to interact and communicate with persons with disabilities. In particular, we will train workers to communicate over the telephone in clear and plain language and to speak clearly and slowly. If we are notified that telephone communication is not suitable to an individual’s communication needs, we will aim to find an alternative means of communication.

### ***Use of Assistive Devices***

Persons with a disability who attend at our premises are permitted, where possible, to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our services.

If there is a physical, technological or another type of barrier that prevents the use of an Assistive Device on our premises we will first endeavour to remove that barrier. If we are not able to remove the barrier, we will ask the person how they can be accommodated and what alternative methods of service would be more accessible to them. We will make reasonable efforts to provide an alternative means of assistance.

We will ensure that all workers are trained and familiar with various Assistive Devices that may be used by persons with disabilities while accessing our services. We will provide a manual wheelchair if an electronic Assistive Device (such as a scooter or automatic wheelchair) is unable to move safely around the building.

## ***Use of Service Animals***

We are committed to welcoming persons with disabilities who are accompanied by a Service Animal on the parts of our premises that are open to the public and other third parties, unless the Service Animal is otherwise excluded by law, in which case steps will be taken to ensure that other measures are available to enable a person with a disability to access our goods and services.

It is the responsibility of the person using the Service Animal to ensure that the Service Animal is kept in control at all times.

We will ensure that all workers dealing with anyone entering our premises are properly trained in how to interact with persons with disabilities who are accompanied by a Service Animal.

## ***Use of Support Persons***

We are committed to welcoming persons with disabilities who are accompanied by a Support Person and they will be permitted to enter Accerta's premises together. At no time will a person with a disability who is accompanied by a Support Person be prevented from having access to his or her Support Person while on Accerta's premises.

Accerta may require a person with a disability to be accompanied by a Support Person while on its premises, but only if a Support Person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises, and there is no other reasonable way to do so.

All workers will receive training on how to interact with customers with a disability who are accompanied by a Support Person.

## **5. Notice of Temporary Service Disruptions**

The Company will notify customers if, during regular business hours, there is a planned or unexpected disruption of a facility or service that persons with a disability use to access our services. In these circumstances, Accerta will leave an emergency message on our phone system or post on our website or on social media regarding the service disruption.

The notice will include the following information:

- That a facility or service is unavailable and the reason for the disruption.
- The anticipated duration of the disruption.
- Alternative facilities or services, if available.

In the event of an unexpected disruption, notice will be provided as soon as possible.

## 6. Training for Workers

The Company will provide Accessible Customer Service training to all workers. Training will be provided to all workers as soon as practicable and on an ongoing basis as necessary.

All workers are required to complete the Customer Service training module available through [AccessForward.ca](https://www.accessforward.ca) upon hire and provide confirmation to the Company that such training has been completed. This training module includes:

- A review of the purposes of the AODA and requirements of the Customer Service Standard.
- How to interact and communicate with customers with various types of disabilities.
- How to interact with customers with a disability who use an Assistive Device or require the assistance of a Service Animal or Support Person.
- How to use equipment or devices made available on our premises to assist customers with a disability to obtain, use or benefit from our goods and services.
- What to do if a customer with a disability is having difficulty accessing our goods and/or services.

Additional training will be provided to workers regarding Accerta's policies, practices and procedures relating to this Accessible Customer Service Policy. Workers will also be trained regarding what to do with feedback received regarding the manner in which Accerta provides goods or services to persons with disabilities.

Records of the training provided, including confirmation from workers that the training module has been completed, including the dates such training was completed, shall be maintained in accordance with the requirements of the AODA. If the Company provides additional training on this Accessible Customer Service Policy to its workers, it will keep records of the date such training was provided and the number of workers the training was provided to.

## 7. Feedback Procedure

Feedback regarding the way Accerta provides goods and services to persons with disabilities is welcomed and appreciated.

Individuals may provide feedback by any method, (e.g. in person, by email, by telephone or other appropriate medium). To provide feedback, contact Accerta at: Tel: 416-922- 6565; Fax: 416-922-4323; Email: [info@accerta.ca](mailto:info@accerta.ca). Please address your communication to the attention of the Manager, Human Resources.

The Company is prepared to provide accessible formats and communication supports for persons with disabilities who wish to provide feedback to the Company, upon request. Please contact us using any of the contact methods listed above to request accessible formats and communication supports.

The Company will respond to all feedback received as soon as practicable, and acknowledge receipt of the feedback within twenty (20) business days of receipt. A reply will be provided in the format requested by the person who provided the feedback, by email, phone or in writing, if practicable. The response will contain an acknowledgement of the receipt of the person's feedback, and outline any further action(s) to be taken.

Where appropriate, feedback will be taken into consideration as part of the ongoing review of this Accessible Customer Service Policy.

## **8. Availability of Documents**

In accordance with the requirements of the AODA, a copy of this Accessible Customer Service Policy, which includes information regarding the Company's feedback process, is made available by posting it on the Company's website. On request, the Company will provide documents, or the information contained in documents, to a person with a disability in an accessible format or with communication support, in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

In particular, we are committed to providing accessible invoices to all people to whom we issue invoices. For this reason, invoices will be provided in alternate formats upon request. We will answer any questions about the content of the invoice in person, by telephone or e-mail, in accordance with our Privacy Policy.

## **9. Questions About This Policy**

Any person who has questions regarding this Accessible Customer Service Policy are encouraged to contact us via any of the methods identified above in the Feedback Procedure.

**Last Revised: June 4, 2021**

# Accessibility Policy and Multi-Year Plan

## 1. Purpose

The purpose of this policy is to create a more accessible environment for all stakeholders, including employees, workers, job applicants, AccertaClaim Servcorp Inc. (“**Accerta**” or the “**Company**”) members, suppliers and visitors, in line with the goals of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”).

The AODA aims to create a more accessible Ontario by identifying and, to the extent possible, preventing and eliminating barriers experienced by people with disabilities. The *Integrated Accessibility Standards* regulation (the “**IASR**”) has been enacted under the AODA to establish certain general requirements along with five accessibility standards under the headings of customer service, information and communications, employment, transportation, and design of public spaces. These regulations inform the Company’s approach to accessibility and help ensure that our workspaces and practices accommodate for employees of varying needs and abilities.

The Company has implemented the following Accessibility Policy to comply with its obligations pursuant to the AODA. All workers are required to comply with the Accessibility Policy at all times while performing their duties and responsibilities, and/or when acting as a representative of the Company.

The Company will provide workers with training on the requirements of the accessibility standards set out under the AODA, the Code and on the provision of goods and services to persons with disabilities. Completion of this training is mandatory for all workers.

## 2. Scope

This policy applies to all of the Company’s operations in Ontario and to all workers who perform services for the Company in Ontario, although certain sections will be applicable only to employees of the Company.

## 3. Definitions

For the purposes of this policy:

“Assistive Device”

means any device that is designed, made or adapted to assist a person to perform a particular task, including physical or technical aids, such as communication devices, canes, crutches, hearing aids and wheelchairs.

“Barrier”

means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This includes a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

“Disability”

means:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- (b) a condition of mental impairment or a developmental disability;
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (d) a mental disorder; or
- (e) an injury or disability for which benefits were claimed or received under the insurance plans established under the *Workplace Safety and Insurance Act, 1997*.

“Service Animal”

includes any animal if,

- (c) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- (d) the person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

“Support Person”

means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.



“Accessible Formats”	may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities;
“Communication Supports”	may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications;
“Workers”	includes all persons who deal with members of the public or other third parties on behalf of the Company, or who are responsible for developing the Company’s policies, including employees, agents, volunteers and contractors of the Company.
“Employee”	means an employee of the Company, whether engaged on a full-time, part-time, temporary, casual or reduced work arrangement, and does not include contractors or volunteers.
“Applicant”	means a person applying for paid employment with the Company.

## 4. Statement of Organizational Commitment

Accerta is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity and are committed to meeting the needs of persons with disabilities in a timely manner by identifying, preventing and removing barriers to accessibility and meeting accessibility standards in accordance with the AODA and the IASR.

## 5. Accessibility Policy and Multi-Year Accessibility Plan

### **General Requirements**

#### **Accessibility Policies and Multi-Year Accessibility Plan**

The Company has developed, implemented and will maintain policies, including its Accessible Customer Service Policy and this Accessibility Policy, governing how the Company has achieved or will achieve accessibility by meeting its requirements under the IASR.

Within this Accessibility Policy, the Company has also established, implemented, documented and will maintain a Multi-Year Accessibility Plan, which outlines the Company's strategy to identify, remove and prevent barriers and increase accessibility for persons with disabilities, in accordance with the Company's obligations under the AODA.

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

**Actions Taken:**

- Accessible Customer Service Policy and Accessibility Policy developed and implemented
- Multi-Year Accessibility Plan developed and implemented

**Required legislative compliance:** January 1, 2014

**Upcoming Deadlines:** next review of Multi-Year Accessibility Plan - 2026

**Training Workers**

The Company provides training on the requirements of the accessibility standards referred to in the IASR and on the Code as it pertains to persons with disabilities to all workers.

The training shall be appropriate to the duties of the workers. In that regard, all workers are required to complete the training modules relating to the General Requirements, Accessible Customer Service Standard, Information and Communications Standard and Employment Standard available via [AccessForward.ca](http://AccessForward.ca). Workers must also complete the training module developed by the Ontario Human Rights Commission on the requirements of the Code pertaining to persons with disabilities, available at <http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda>.

New workers must complete the training as soon as possible, but at a minimum within 30 days of their start date.

Additional training will be provided to workers as necessary on the content and requirements of the Company's Accessibility Policy, including when changes are made to this Policy. Records of the training provided, including confirmation from workers that the training modules have been completed, including the dates such training was completed, shall be maintained in accordance with the requirements of the AODA. If the Company provides additional training on this Accessibility Policy to its workers, it will keep records of the date such training was provided and the number of workers the training was provided to.

### **Actions Taken:**

- Instructions with respect to training requirements provided to all current workers and confirmation of completion of all training requirements received;
- Instructions with respect to training requirements to be provided to all new workers as part of orientation process;
- Additional training on accessibility in the workplace scheduled to occur on an ongoing basis;

**Required legislative compliance:** January 1, 2015

**Upcoming Deadlines:** ongoing training of new workers and otherwise as necessary

## ***Information and Communications Standard***

### **Accessible Websites and Web Content**

Accerta has updated its public website and any content published after January 1, 2012 in order to conform with World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, other than certain requirements specifically excluded under the IASR, and except where this requirement is not practicable.

### **Actions Taken:**

- Website and web content reviewed and updated for compliance

**Required legislative compliance:** January 1, 2014 / January 1, 2021

**Upcoming Deadlines:** The Company will ensure that all new content added to its public website conforms to the guidelines.

### **Feedback**

The Company has a process for receiving and responding to feedback received from persons with disabilities, as set out in our Accessible Customer Service Policy. The Company's feedback process is accessible to persons with disabilities as the Company has provided multiple ways in which customers may provide such feedback, and by making it clear that the Company will provide or will arrange for the provision of, accessible formats and communications supports, upon request. The availability of accessible formats and communication supports is outlined in our Accessible Customer Service Policy, which is posted on our website.

### **Actions Taken:**

- the Company has developed an accessible feedback process as described in our Accessible Customer Service Policy

- information about the feedback process, and the availability of accessible formats and communication supports, is contained within the Accessible Customer Service Policy, which is posted on the Company' website

**Required legislative compliance:** January 1, 2015

**Upcoming Deadlines:** ongoing review of any feedback received and any requests for accessible formats and communication supports

### **Accessible Formats and Communication Supports**

Upon request, the Company will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities in connection with their communications with the Company or when accessing information or documents from the Company. The Company will do so in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

The Company will consult with the person making the request in determining the suitability of an accessible format or communication support. The availability of accessible formats and communication supports is outlined in our Accessible Customer Service Policy, which is posted on our website.

In particular, if the Company at any time prepares emergency procedures, plans or public safety information which is made available to the public, the Company will provide the information in an accessible format, or with appropriate communication supports, as soon as practicable, upon request.

### **Actions Taken:**

- the Company has selected a designated individual who will receive and respond to any requests for accessible formats and communication supports
- the availability of accessible formats and communication supports is outlined in the Accessible Customer Service Policy, which is posted on the Company's website

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** ongoing review of any requests for accessible formats and communication supports

### ***Employment Standard***

The entitlements and obligations set out herein apply only with respect to applicants and employees of the Company, as defined above.

### Recruitment, Assessment or Selection Process

The Company notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process by posting a statement in this regard on its website on the career page.

The Company will notify applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Company will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

#### **Actions Taken:**

- the Company has posted a statement with respect to the availability of accommodation for applicants on its website
- the Company's recruitment process includes notifying applicants who are selected to participate further in the selection process that accommodations are available upon request, and consultation with any applicant that requests an accommodation to provide for a suitable accommodation, as described above

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** ongoing accommodation of applicants, as requested

### Notice to Successful Applicants

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities and will provide all employees with a copy of this Accessibility Policy.

#### **Actions Taken:**

- Accerta advises all successful applicants that it has policies in place with respect to the accommodation of employees
- all employees will receive a copy of this Accessibility Policy

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** ongoing provisions of the Accessibility Policy to employees.

### Informing Employees of Supports

The Company informs its employees of its policies (and any changes to those 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 providing employees with a copy of this Accessibility Policy, and through training on the AODA.

The Company will provide this information to new employees as soon as practicable after commencing employment.

**Actions Taken:**

- All employees are provided with a copy of this Accessibility Policy, which they are required to review
- all employees are required to complete training on the AODA and the Code, as set out herein

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** provide notice to employees whenever the Accessibility Policy is updated

**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 the employee’s 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.

**Actions Taken:**

- The Company is committed to providing employees with accessible formats and communication supports on request

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** consider requests for accessible formats and communication supports from employees on an ongoing basis

**Workplace Emergency Response Information**

The Company is committed to ensuring the safety of all of its employees in the event of a workplace emergency. The Company expects that where an employee has a disability, including a temporary injury or medical condition, that could impact the employee’s ability to safely respond in the event of a workplace emergency, the employee will alert the Company to any possible barriers the employee may face, including details of the extent of any restrictions or limitations the employee may experience. Employees should contact the Joint

Health and Safety Committee or Human Resources as soon as possible if they have any concerns relating to their ability to respond safely in the event of a workplace emergency.

The information provided by an employee pursuant to this section will be used by the Company to design an individualized workplace emergency response plan to help an employee overcome any barriers they may face in the event of a workplace emergency.

All new employees will be advised of the availability of individualized workplace emergency response plans during the orientation process. Existing employees will be reminded of their obligation to report any concerns relating to their ability to safely respond in the event of a workplace emergency at regular intervals, including whenever this Accessibility Policy is updated.

All information provided by employees pursuant to this section will remain confidential, except to the extent disclosure is necessary in order to assist the employee pursuant to their individualized workplace emergency response plan. Employees are not required to provide details regarding their medical condition or disability, only about the type of help or assistance the employee may need in an emergency.

Individualized workplace emergency response plans will be reviewed whenever an employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the Company reviews its general emergency response policies.

**Actions Taken:**

- the Company has advised all current employees that if they have a disability that could impact their ability to safely respond in the event of an emergency, they must speak with the Joint Health and Safety Committee or Human Resources as soon as possible so that an individualized workplace emergency response plan can be developed
- new employees are advised that the Company will provide individualized workplace emergency response plans as required during the orientation process

**Required legislative compliance:** January 1, 2012

**Upcoming Deadlines:** continue to include a discussion with respect to individualized workplace emergency response plans as part of orientation, continue working with employees to develop individualized workplace emergency response plans as required

**Documented Individual Accommodation Plans**

The Company will provide reasonable accommodation to all employees with disabilities who require accommodation in the workplace and will work with employees to develop unique individual accommodation plans that best suit the needs of each individual employee. The development of individual accommodation plans is the responsibility of Human Resources.

When developing individual accommodation plans, the Company will follow the process set out below:

- The Company will consult with an employee who requires an accommodation in the workplace before developing an individual accommodation plan for the employee.
- Employees who require accommodation in the workplace are required to cooperate with the accommodation process, including providing the Company with medical information and documentation setting out the employee's accommodation needs, restrictions and limitations. Employees are encouraged to openly discuss their accommodation needs, as well as any medical restrictions and limitations, with the Company.
- If appropriate in the circumstances, the Company may request that an employee undergo an evaluation by an independent medical or other expert to determine the employee's individual accommodation needs, including any medical restrictions or limitations. The costs of any such evaluation by an independent medical or other expert will be paid for by the Company. The Company will refer to the results of any evaluation conducted by an independent medical or other expert to assist the Company in determining whether and/or how the employee can be best accommodated in the workplace.
- The Company will consider the employee's individual accommodation needs, as communicated to the Company by the employee and as described in any medical information received by the Company in regards to the employee, and will develop an appropriate and reasonable individual accommodation plan which takes into account the employee's medical restrictions and limitations.
- the Company will provide the employee with an opportunity to provide comments and feedback on the individual accommodation plan before the individual accommodation plan is implemented. Where appropriate, the Company may revise the individual accommodation plan based on the employee's comments.

In advance of any meeting with the Company to discuss the development of an individual accommodation plan, an employee may submit a request in writing to Human Resources to have a representative from the Company participate in the development of the individual accommodation plan, including a member of the Joint Health and Safety Committee (if applicable) or a Manager or Supervisor. Where the representative proposed by the employee is not appropriate, the Company will suggest a substitute representative for the employee. The employee understands that the representative may be privy to personal information, including any medical information received, regarding the employee as a result of the representative's participation in the development of the individual accommodation plan.

The Company will implement the individual accommodation plan in the workplace. If, during the implementation of the individual accommodation plan, an employee experiences difficulties or has concerns regarding the individual accommodation plan, the Company encourages the employee to raise these concerns immediately with Human Resources. Where appropriate, the Company may make adjustments to the individual accommodation plan



based on feedback received from the employee. In some cases, an employee may be required to provide updated medical information to the Company prior to changes being made to the individual accommodation plan.

The Company will take all necessary steps to ensure the protection and privacy of the employee's personal information, including any medical information received. An employee's medical information shall be stored in a secure location separate and apart from the employee's regular personnel file and will be accessible only by those employees who are involved in the development and implementation of the employee's individual accommodation plan. The Company shall maintain the confidentiality of the employee's personal information and shall not disclose the employee's personal information to any third party without the consent of the Employee, except as required by law.

An individual accommodation plan shall be reviewed and may be updated as often as is necessary to ensure the safe and reasonable accommodation of the employee. At a minimum, the individual accommodation plan shall be reviewed whenever:

- an employee's accessibility needs change;
- an employee moves to a different location or position within the Company;
- an employee, or an employee's Manager or Supervisor, communicates any concerns to the Company in regards to the individual accommodation plan; or
- the Company receives new medical information in regards to the employee.

The Company will take all reasonable steps to provide an employee with individual accommodation in the workplace. If, for any reason, the Company is unable to provide an employee with individual accommodation in the workplace, the Company will meet with the employee to explain the reasons why the Company is unable to accommodate the employee.

The Company will consult with an employee who requires an individual accommodation plan to ensure that the individual accommodation plan is provided to the employee in a format that takes into account the employee's accessibility needs due to disability.

Information regarding accessible formats and communications supports provided to an employee, if any, will also be included in an individual accommodation plan.

In addition, an individual accommodation plan will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided to the employee.

**Actions Taken:**

- The Company has developed a policy, as noted above, with respect to the development of individual accommodation plans for employees

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** continue to work with employees to develop individual accommodation plans as necessary, in accordance with this policy.

### Return to Work Process

The Company is committed to ensuring the safe and successful return to work of those employees who have been absent from work due to a disability. The return to work process, including the development of individual accommodation plans, is the responsibility of Human Resources.

Those employees who have been absent from work as a result of a workplace injury and who received benefits pursuant to the *Workplace Safety and Insurance Act, 1997* (the “**WSIA**”) shall return to work in accordance with the return to work process established by the WSIA.

For all other employees who have been absent from work due to a disability, and who require disability-related accommodations in order to return to work, the Company shall follow the return to work process established below:

- In order to provide the greatest chance of a successful return to work, the Company will require the employee to provide medical information from the employee’s treating physician or specialist stating that the employee is fit to return to work, and setting out the employee’s accommodation needs, medical restrictions and limitations, if any.
- Once an employee’s treating physician or specialist has approved the employee to return to work, the Company will consult with the employee, either in person or over the phone, to discuss:
  - any concerns the employee has in regards to returning to work;
  - the medical information received by the Company in regards to the employee’s medical restrictions and limitations; and
  - the development and implementation of an individual accommodation plan to be put in place upon the employee’s return to work.
- The Company will consider the employee’s individual accommodation needs, as communicated to the Company by the employee and as described in any medical information received by the Company in regards to the employee, and will develop an appropriate and reasonable individual accommodation plan which takes into account the employee’s medical restrictions and limitations.
- The Company will follow the process described above for the development and implementation of an individual accommodation plan.
- The individual accommodation plan shall be put in place immediately upon the employee’s return to work. Depending on the nature of the employee’s disability, the individual accommodation plan may serve as a transitional plan which assists the employee to integrate back into their regular duties and responsibilities, or may provide long term, ongoing accommodation for the employee.

**Actions Taken:**

- The Company has developed a policy, as noted above, with respect to the return to work process

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** continue to work with employees to provide a safe return to work, in accordance with this policy.

### **Performance Management, Career Development and Advancement & Redeployment**

The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

**Actions Taken:**

The Company has committed to considering the accessibility needs of employees with disabilities whenever it conducts performance management, provides career development and advancement, or when redeploying employees.

**Required legislative compliance:** January 1, 2016

**Upcoming Deadlines:** continue to act in compliance with this policy

### **Customer Service Standard**

The Company is in compliance with all requirements set out in the Customer Service Standards. For more detailed information in this regard, please see our Accessible Customer Service Policy.

**Actions Taken:**

- the Company has developed an Accessible Customer Service Policy in compliance with the requirements of the Customer Service Standards
- the Accessible Customer Service Policy is posted on our website and available to the public
- the Company has developed a procedure to notify the public of temporary service disruptions
- instructions with respect to training requirements have been provided to all current workers and confirmation of completion of all training requirements received
- instructions with respect to training requirements shall be provided to all new workers as part of the orientation process
- additional training on accessibility in the workplace will occur on an ongoing basis;
- the Company has developed an accessible feedback process

- details regarding the feedback process are posted on our website

**Required legislative compliance:** January 1, 2012

**Upcoming Deadlines:** continue to act in compliance with the Accessible Customer Service Policy, including reviewing and updating the Policy as necessary, provide training to employees, receiving and responding to feedback, and continuing to alert the public to the availability of documents pursuant to this Policy, in addition to our feedback process and the availability of accessible formats and communication supports.

### ***Transportation Standard***

The Company is not a transportation service provider. Should we provide transportation services in the future, we will ensure compliance with the requirements of the AODA.

**Actions Taken:** n/a

**Upcoming Deadlines:** n/a

### ***Design of Public Spaces Standard***

The Company currently has no plans to construct or substantially redevelop any publicly accessible spaces as identified in the IASR. Should the Company initiate any such construction or redevelopment in the future, it will comply with the applicable technical requirements as set out in the IASR.

**Actions Taken:** n/a

**Upcoming Deadlines:** n/a

## **6. Contact For Questions**

For questions related to this Policy, please contact the Manager, Human Resources via any of the methods identified in the Company's Feedback Process.

**Last Revision:** June 4, 2021