

## **INTEGRATED ACCESSIBILITY STANDARDS REGULATION POLICY & MULTI-YEAR ACCESSIBILITY PLAN**

### **1. PURPOSE**

This policy outlines Genumark's commitment to meeting the requirements of the Accessibility for Ontarians with Disabilities Act (AODA) Integrated Accessibility Standards Regulation (IASR). Our aim is to ensure that our goods, services, facilities, and employment practices are accessible to all individuals, including those with disabilities, in compliance with the AODA.

### **2. SCOPE**

This policy applies to all employees, volunteers, contractors, and any individuals representing Genumark, ensuring that they understand and adhere to the requirements outlined herein.

### **3. STATEMENT OF COMMITMENT**

Genumark is dedicated in providing a barrier-free environment and ensuring equal access and opportunities for all individuals, regardless of their abilities or disabilities. We commit to preventing, removing, and addressing barriers to accessibility in the following areas as outlined by the IASR: a. Information and Communication b. Employment c. Design of Public Spaces, and d. Customer Service

### **4. GENERAL PROVISIONS**

#### **a) Multi-Year Accessibility Plan**

Our Multi-Year Accessibility Plan outlines phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA, 2005. There are many different types of barriers faced by people with disabilities; these include:

- Physical barriers, such as lack of access to ramps, or inaccessible transportation
- Attitudinal barriers, which includes people who make judgments and assumptions about what people with disabilities can and cannot do.
- Technological barriers, as when certain technologies are not useful for people with disabilities, such as websites that does not support screen reading software.
- Information and communication barriers, as when certain formats of information are not useful for people with disabilities, such as print that is too small to read.

We will take appropriate steps to prevent and remove any accessibility barriers identified by employees and customers. We will review and update the plan as necessary.

#### **b) Training**

We will provide training to all employees (full-time, part-time, temporary) and contractors to ensure they understand their responsibilities under the AODA IASR. Training will be provided in a way that best suits the duties of the employees. Ongoing training will be provided to new employees as soon as

practicable. If any changes are made to this policy or the requirements, training will be provided to include those changes. We will maintain completed training records.

**c) Procuring or Acquiring Goods, Services, or Facilities**

We will take into consideration accessibility criteria and features as much as practicable when procuring and acquiring good, services, and facilities to show our commitment to accessibility.

**d) Accessible Emergency Information**

We are committed to providing our customers with publicly available emergency information in an accessible format upon request. We will also provide team members with disabilities with individualized emergency response information when necessary and/or upon request.

**e) Self-Service Kiosks**

The IASR requires large organizations to consider accessibility when designing, procuring, and acquiring self-service kiosks. In the event we utilize self-service kiosks, we will comply with this provision.

**5. ACCESSIBILITY STANDARDS**

**a) Information and Communication**

We are committed to meeting the communication needs of all our customers. We will create, provide, and receive information and communication in ways that are accessible to people with disabilities. In the event we determine it is not feasible to convert the information or communication or technology to accessible format, we will provide the person that requires the information with an explanation as to why as well as a summary of the information.

*i. Accessible Formats and Communication Supports*

We shall provide or arrange for accessible formats and communication supports for persons with disabilities by following the four bullets listed below:

- Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons;
- Consult with the person making the request and determine suitability of an accessible format and communication support;
- Notify the public about the availability of accessible formats and communication supports

*ii. Employee Notification*

We shall inform our employees of policies that support those with disabilities, including but not limited to, provision of job accommodations that consider an employee's accessibility needs due to a disability. This will include:

- Providing information under this section as soon as practicable to new team members after they begin employment, specifically in the orientation process;

- Whenever there is a change to existing policies on the provision of job accommodations that consider an employee's accessibility needs due to a disability;
  - Where an employee with a disability make a request, we will provide or arrange for provision of suitable accessible formats and communication supports for: information that is needed in order to perform the employee's job; and information that is generally available to employees in the workplace;
  - Consult with the person making the request and determine suitability of an accessible format and communication support.
- iii. *Website Content*
- When designing our website, we are committed to conform to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0, Level AA as outlined in the Information and Communication Standard.
- iv. *Feedback*
- We have a process in place for receiving and responding to feedback from our customers. The feedback process can be provided in accessible format and with communication supports upon request. We will also notify the public about the availability of accessible formats and communication supports.

## **b) Employment**

We are committed to fair and accessible employment practices that ensure the process of recruiting, hiring, communicating, and retaining team members with disabilities fulfills the intent of the Ontario Human Rights Code.

### **i. Recruitment**

We shall notify employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, and processes;
- Specify that accommodation is available for applicants with disabilities on job postings;
- Notify applicants, when they are individually selected to participate in an assessment or selection process that accommodation are available upon request in relation to the materials or processes to be used
- If a selected applicant requests an accommodation, we will consult with the applicant and provide or arrange for provision of a suitable accommodation that consider the applicant's disability

### **ii. Workplace Emergency Response Information**

We shall provide individualized workplace emergency response information to employees with disabilities as per the following four bullets listed below:

- If the disability is such that the individualized information is necessary and the company is aware of the need for accommodation due to the employee's disability;
- If the employee who receives an individualized workplace emergency response information requires assistance and with the employee's consent, we shall provide the workplace emergency information to the person designated by us to provide assistance to the employee;
- As soon as practicable, after becoming aware of the need for accommodation due to the employee's disability;
- Review the individualized workplace emergency response information if/when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.

iii. *Individual Accommodation Plans/Return to Work Processes*

We will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

We will ensure that the processes for the development of documented individual accommodation plans include the following elements, in accordance with the IASR:

- The manner in which the employee requesting accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The identification of accommodation to be provided;
- The timelines for the provision of accommodations;
- The manner in which we can request an evaluation by outside medical or other expert, at our expense, to determine if and how accommodation can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for denial will be provided to the employee;
- A format that consider the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- The identification of any other accommodation that is to be provided.

We will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work.

Such processes shall be documented and must outline the steps we will take to facilitate the return to work and include an individual accommodation plan.

- iv. *Performance Management, Career Development and Advancement, & Redeployment*  
We will consider accessibility needs of employees with disabilities, as well as individual accommodation plans during performance management process; when providing career development and advancement information; and when using redeployment procedures.

**c) Transportation**

The transportation standard sets out requirements for transportation service providers. This standard does not apply to us as we do not provide transportation services. We will however consider accessibility criteria and features as much as practicable, if this changes.

**d) Design of Public Spaces**

We are committed to ensuring that newly constructed or redeveloped public spaces are designed in compliance with the IASR standards for accessibility.

## **6. REVIEW AND COMPLIANCE**

This policy will be reviewed periodically to ensure ongoing compliance with the AODA IASR. Any necessary updates or changes will be made to enhance accessibility within our organization.

## **7. FEEDBACK/CONCERNS OR FOR MORE INFORMATION**

We encourage feedback on how we can improve accessibility in our organization. Individuals can provide feedback, raise concerns, and/or obtain more information on our accessibility policies by contacting:

People & Culture  
(647) 498-7319

Accessible formats of this document are available upon request.

## GENUMARK MULTI-YEAR ACCESSIBILITY PLAN

STANDARD/ INITIATIVE	DESCRIPTION	ACTION	STATUS	COMPLIANCE DATE
<b>Customer Service Standard/ Establishment of Accessibility Policies</b>	Policies, practices, procedures <ul style="list-style-type: none"> <li>Establish policies, practices and procedures on providing goods or services to persons with disabilities according to requirements set out in regulation.</li> <li>Create document describing policies, procedures, and practices; provide upon request in alternative format.</li> </ul>	Policy has been drafted and shared with all employees	Completed	January 1, 2008
<b>Customer Service Standard/ Information &amp; Communication</b>	<ul style="list-style-type: none"> <li>Must communicate with a person with a disability in a manner that takes into account their disability</li> </ul>	Manager and People & Culture (P&C) will handle on case by case basis	Ongoing	January 1, 2008
<b>Customer Service Standard/ Use of Service Animals &amp; Support Persons</b>	<ul style="list-style-type: none"> <li>Establish policies, practices and procedures around a person with a disability being accompanied by a service animal or support person.</li> </ul>	Policy has been drafted and shared with all employees	Completed	January 1, 2008
<b>Customer Service Standard/ Training for Employees</b>	Provide training to: <ul style="list-style-type: none"> <li>Employees (full-time, part-time, temps), volunteers who deal with the public or others.</li> <li>everyone who participates in developing the policies, practices and procedures overseeing providing goods or services to public or others.</li> <li>Include training on specific topics set out in the regulation.</li> <li>Provide training on ongoing basis to reflect any changes to policies, practices and procedures.</li> <li>Create document describing training policy, summary of content and details of when provided.</li> <li>Keep records of training provided, including dates and number trained.</li> </ul>	Develop training slides; communicate requirement; distribute training to employees – existing and new	Completed & Ongoing	January 1, 2008

<b>Customer Service Standard/ Feedback Process</b>	<ul style="list-style-type: none"> <li>Establish process for receiving and responding to feedback; make information about process publicly available.</li> <li>Create document describing process; make available on request.</li> </ul>	Description of process included in policies and made publicly available at office reception	Completed	January 1, 2008
<b>Integrated Accessibility Standard/ Establishment of Accessibility Policies</b>	<ul style="list-style-type: none"> <li>Develop, implement, and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the IASR.</li> <li>Include statement of organizational commitment to meeting accessibility needs</li> <li>Create document describing policies, procedures, and practices; make publicly available in an accessible format</li> </ul>	Draft and distribute Integrated Accessibility Standard Policy to all employees; make publicly available in accessible format upon request	Completed	January 1, 2014
<b>Integrated Accessibility Standard/ Accessibility Plan</b>	<ul style="list-style-type: none"> <li>Establish, implement, maintain and document a Multi-year Accessibility Plan (MYAP); post online in an accessible format, and update every five years.</li> </ul>	<p>Draft and post on website.</p> <p>Complete review at least every five years.</p> <p>Amend and repost on website as necessary.</p> <p>Provide in accessible format upon request.</p>	Completed & Ongoing	January 1, 2014
<b>Integrated Accessibility Standard/ Training</b>	<ul style="list-style-type: none"> <li>Provide training on the requirements of the accessibility standards referred to in IASR and on the Human Rights Code as they pertain to persons with disabilities to employees, volunteers, persons who participate in developing the organization's policies, persons who provide goods,</li> </ul>	<p>Create online training materials and program.</p> <p>Provide training to applicable existing and new employees</p>	Completed & Ongoing	January 1, 2014

	<p>services or facilities on behalf of the organization.</p> <ul style="list-style-type: none"> <li>• Training must be appropriate to the duties of the employee, etc.</li> <li>• Employees, etc. must be trained as soon as practicable.</li> <li>• Provide training in respect of any changes to the policies on an ongoing basis.</li> <li>• Keep a record of training, including dates and number of those trained.</li> <li>• Provide training to all persons about the provision of goods and services or facilities as the case may be, to persons with disabilities.</li> </ul>	<p>as part of orientation.</p> <p>Maintain record of training completion.</p> <p>Review training and adjust as appropriate/needed. Re-train each time changes to policies take place.</p>		
<b>Integrated Accessibility Standard/ Accessible Formats and Communication Supports</b>	<ul style="list-style-type: none"> <li>• Upon request, provide or arrange for accessible formats and communication supports for persons with disabilities.</li> <li>• Do so in consultation with the requesting person, in a timely manner, taking into account person's accessibility needs, at a cost no greater than the cost charged to other persons.</li> <li>• Notify the public about the availability of accessible formats and communication supports.</li> </ul>	<p>Requests will be handled on a case by case basis; any disputes will be handled through P&amp;C</p> <p>Include notification wherever accessibilities procedures are described.</p>	Completed	January 1, 2014
<b>Integrated Accessibility Standard/ Accessible Website and Web Content</b>	<ul style="list-style-type: none"> <li>• Ensure that new web content conforms to WCAG 2.0 Level A.</li> <li>• All web content must conform to WCAG 2.0 Level AA, subject to exceptions.</li> </ul>	<p>Requirements provided to Web Development and IT teams</p>	Completed	January 1, 2014
<b>Integrated Accessibility Standard/ Feedback</b>	<ul style="list-style-type: none"> <li>• Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.</li> </ul>	<p>Requests will be handled on a case by case basis; any disputes will be handled through P&amp;C.</p>	Completed	January 1, 2014



	<ul style="list-style-type: none"> <li>Notify the public about the availability of accessible formats and communication supports.</li> </ul>	Include notification wherever accessibilities procedures are described.		
<b>Integrated Accessibility Standard/ Employment</b>	<b>Recruitment – General</b> <ul style="list-style-type: none"> <li>Notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment processes.</li> </ul>	Update recruitment process to include communication on availability of accommodation if needed on all job postings.	Completed	January 1, 2014
	<b>Recruitment – Selection and Assessment Process</b> <ul style="list-style-type: none"> <li>During a recruitment process, notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</li> <li>If a selected applicant requests an accommodation, 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.</li> </ul>	Requests will be handled by P&C and Hiring Manager as needed.  Notification that accommodation is available will be provided at time of assessment.  Will consult with applicant as required and ensure enough time is available when accommodation request is received.	Completed & Ongoing	January 1, 2014
<b>Integrated Accessibility Standard/ Employment</b>	<b>Informing Employees of Supports</b> <ul style="list-style-type: none"> <li>Inform employees of policies used to support its employees with disabilities including, but not limited to, policies on the provision of job accommodations that consider an</li> </ul>	Information will be available during orientation process and through policy training.	Completed & Ongoing	January 1, 2014

	<p>employee's accessibility needs due to disability.</p> <ul style="list-style-type: none"> <li>• Provide this information to new employees as soon as practicable after they begin their employment.</li> <li>• Provide updated information to employees whenever there is a change to existing policies.</li> </ul>			
	<p>Workplace Emergency Response Information</p> <ul style="list-style-type: none"> <li>• If aware of need for accommodation, provide individualized workplace emergency response information (IWERI) to employees who have a disability, if the disability is such that the individualized information is necessary.</li> <li>• If an employee who receives individualized workplace emergency response information (IWERI) requires assistance and consents, provide the IWERI to the person designated by the employer to provide assistance to the employee.</li> <li>• Provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</li> <li>• Review the IWERI whenever (i) an employee moves to a different location; (ii) the employee's overall needs change; or (iii) the employer reviews general emergency response policy.</li> </ul>	<p>Included in the IASR policy which is provided and shared with all employees</p> <p>Manager and P&amp;C will handle on a case by case basis.</p> <p>P&amp;C will review all affected IWERIs when general emergency response policy changes.</p>	Completed & Ongoing	January 1, 2014
	<p>Documented Individual Accommodation Plans</p> <ul style="list-style-type: none"> <li>• Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</li> </ul>	<p>Template is available and requests will be handled by Manager and P&amp;C. Exact format to be</p>	Completed	January 1, 2014

		determined on a case by case basis taking into consideration the employee's disability and need for accommodation .		
	<p>Return to Work Process</p> <ul style="list-style-type: none"> <li>Develop and have in place a documented return to work process for employees who have been absent from work due to a disability and require accommodations to return to work.</li> <li>The process shall outline the steps the employer will take to facilitate the return to work of employees who were absent due to disability, utilizing individual accommodation plans</li> </ul>	<p>Current RTW Process covers this requirement.</p> <p>Will implement use of Individual Documented RTW plans for non-occupational illness and injury.</p>	Completed	January 1, 2014
	<p>Performance Management, Career Development and Advancement, Redeployment</p> <ul style="list-style-type: none"> <li>Take into account the accessibility needs of employees with disabilities when providing performance management, when using career development and advancement, and when redeployment is necessary</li> </ul>	Continue using established processes; assess accommodation needs on individual basis. Manager and P&C to handle on case by case basis.	Completed & Ongoing	January 1, 2014
<b>File Report</b>	File Accessibility Report as necessary	Review filing requirements and file as required	Ongoing	--