

Cole International – Accessibility Policy

Multi-year Accessibility Plan and Policies - Ontario

Accessibility for Ontarians with Disabilities Act
Revised – June 2021

1. POLICY

The scope of this policy is to outline the 2014-2025 accessibility plan, including the policies and actions that Cole has put in place to improve opportunities for people with disabilities. Cole International will continue to introduce policies, procedures and provide the appropriate training as defined under the AODA Regulations.

2. STATEMENT OF COMMITMENT

Cole is committed to treating all people in a way that allows them to maintain their dignity and independence. We support integration and equal opportunity for all people. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

3. RESPONSIBILITY

The President, COO, Director of Organizational Development, Director of IT, Marketing Manager, Payroll and Senior Managers have overall responsibility for the implementation of the Accessibility for Ontarians with Disabilities Act (AODA).

All management levels and their personnel are responsible to comply with all procedures and practices as outlined within this document.

4. DEFINITIONS

a. Disability

The restriction in a person's functional capacity that results from impairment. Some common disabilities include Developmental/Intellectual, Hearing, Learning, Mental Health, Physical/Mobility and Visual.

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b. Barrier

Anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technology barrier or a policy or practice.

c. Functional Abilities / Job Demands Assessment

A Functional Abilities / Job Demands Assessment is a document completed by a medical professional that outlines a worker's ability to perform work and their physical tolerances to a variety of work activities. It is a comprehensive assessment of the job tasks and includes quantification (weights, frequency, and duration) of all work tasks.

d. Employment Standard

Applies to paid employment and will help employers make their employment practices and workplaces more accessible to people with disabilities. This standard builds upon existing requirements under the Ontario Human Rights Code and applies to these human resource activities:

- Accessibility for Ontarians with Developing and documenting individual accommodation plans for employees with disabilities.
- Recruitment, assessment and selection and informing employees of supports.
- Accessible formats and communication supports.
- Workplace emergency response information.
- Facilitating return to work for those requiring accommodation in the workplace.
- Performance management, redeployment and career development and advancement.

5. RECRUITMENT AND HIRING PROCESS

All job advertisements will include a declaration that states Cole will make reasonable arrangements to accommodate applicants with disabilities. When inviting an applicant for an interview, the hiring manager shall ask if the applicant requires any special accommodations in order to attend.

The hiring manager shall consider the following items when preparing for an interview:

- Location of the interview
- Format of any skills assessment tests
- Room set-up for in-person interviews
- Interviewing timelines

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- Support persons
- Completing Paperwork / Documentation

All offers of employment will include an accommodation clause and contact information should the successful candidate require accommodations to be in place in order to commence employment.

6. RETURN TO WORK PROCESS

Upon return to work from a disability leave, The Management will work with the employee, local management and any third-party insurance companies to ensure the returning employee will make an early and safe return to work wherever possible.

The returning employee is required to provide medical documentation (at their cost) either directly from their doctor or via a third-party insurance company that indicates they are able to return to work. If they are unable to return to work without accommodation, a medical certificate from their doctor or the third-party insurance company outlining the required accommodations must be provided.

If accommodation is required, an individual accommodation plan will be developed.

7. WRITTEN ACCOMMODATION PROCESS

Cole is committed to providing accommodations for people with disabilities.

The need for accommodation should be:

- Requested by the employee through their direct manager (a doctor's note is recommended); or
- Identified by the employee's manager during performance management, career development and redeployment processes.

Cole will gather relevant information and assess the employee's needs, with the employee actively participating in this process. The employee may also request the participation of a representative from the workplace. Please note that this policy does not refer to minor, temporary job modifications that last one week or less. A formal, written accommodation plan is not required under these circumstances; however, a doctor's note (at the employee's expense) may still be required to ensure the employee's functional abilities are being met during this period.

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While the Company does not require details on the nature of the employee's disability to provide an accommodation, the Company must be advised of the employee's functional abilities. As such, Management may request a functional abilities / job demands assessment, at the Company's expense, from the employee's physician(s). The Company may also request that an external expert participate, at the Company's expense. Employees are still responsible for the cost of medical certificates required to apply for short-term disability, short-term absences due to illnesses, maternity leave, family leave, etc. as per existing policies.

Applicable options will be evaluated by the parties involved to determine the most appropriate accommodation measure for the employee. Examples of measures (modified duties) may include:

- Reduction in hours of work or change in work schedule
- Change in work location
- Different equipment or work methods
- Assignment of special projects
- Related duties or limited duties using the employee's same skill and work knowledge

Once the most appropriate accommodation has been identified, the details are captured in a formal plan. The accommodation plan is provided to the employee in a format that takes into account the accessibility needs due to the nature of the disability. Please note that the employee's personal information is protected at all times.

The formal plan may include:

- Accessible formats and communication supports, if requested
- Workplace emergency response information, if required
- Any other accommodation that is to be provided

If the individual accommodation is denied, the manager is required to respond to the employee with the reason for the denial, in an accessible format.

The approved accommodation plan is then implemented, monitored and reviewed to ensure that it has effectively resolved the challenge which the employee faces. A copy of the accommodation plan is filed with the employee's Human Resources information.

- Formal plan reviews are conducted at a predetermined frequency
- The accommodation plan is reviewed if the employee's work location or position changes
- The accommodation is reviewed if the nature of the employee's disability changes

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If the accommodation is no longer appropriate, the employee and the manager are required to work together to gather relevant information and reassess the employee's needs in order for Cole to find the best accommodation measure as per the above policy.

8. OTHER EMPLOYMENT ACCESSIBILITY BARRIERS

Cole will take the following steps to prevent and remove other accessibility barriers identified.

- **Some existing computer software programs used within Cole are not accessible to individuals with disabilities.**
 - When sourcing or developing new software programs, Cole will consider individuals with disabilities.
 - This may include such options as allowing for hands-free access, changes to screen and font colours and sizes, electronic interfaces to reduce hands-on typing, verbal prompts, etc.
 - Other software programs will be assessed on an as needed basis.

- **Review physical barriers at all of our locations and address accordingly**
 - When building, renovating or leasing company locations, ease of access for all individuals will be considered.
 - This may include such things as ensuring there are elevators or chair lifts if the location is above ground floor, that doorways and pathways between cubicles are sufficiently wide enough for wheelchairs and walkers, that washrooms are equipped with a handicap stall, that main entrances are equipped with automatic doors with a push button, etc.
 - Assessments were completed and remediation plans (where possible) were developed by December 31, 2015.

- **Review internal job functions and make recommendations for changes to processes to improve accessibility for new and existing employees.**
 - Job functions were initially reviewed by December 31, 2015. Job functions are reviewed periodically.

9. ACCESSIBLE EMERGENCY INFORMATION

Cole is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

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If an employee suffers from any type of condition that prevents them from exiting the workplace in a safe manner, they should contact their local Manager. They will be asked to complete a questionnaire in order to determine the type of assistance they may require.

Based on the responses in the questionnaire, an individualized employee emergency plan will then be developed by The Management and provided to the employee to ensure their individual needs are met. A copy of this plan will be maintained in the employee's health file and also provided to those individuals who are assigned to assist in case of an emergency.

Examples of conditions or disabilities that require assistance include:

- Using an assistive device such as a wheelchair, crutches, walker or other device
- Suffering from panic attacks when faced in crowded situations
- Hearing or visual impairment that affects them from responding to fire alarms or seeing emergency exits
- Having a condition that affects mobility, even if it does not require an assistive device

10. TRAINING

All Ontario employees receive training on the AODA Integrated Accessibility Standards Regulation and its requirements, as well as the Ontario Human Rights Code as it pertains to disabilities.

Training may be provided in several different formats depending on need, time constraints and availability. These formats include in person, webinar and print.

Training includes:

- A review of the purposes of the Accessibility for Ontarians With Disabilities Act (AODA)
- The requirements of the Integrated Accessibility Standards Regulation
- The Ontario Human Rights Code and the benefits of a diverse workforce
- Cole policies and procedures relating to employment accessibility

Initial training was provided via webinar prior to February 1, 2015. Training is provided to new hires as part of their orientation as soon as practicable after he or she is hired or assigned to a role that requires additional information in relation to the Standard.

Additional training to all employees occurs on an annual basis and when changes to these policies, practices and procedures occur.

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Training records shall be kept by Payroll and Organizational Development and will include the date the training occurred, who attended the training and an outline of the training provided.

11. KIOSKS

Cole has taken the following steps to ensure employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks by March 30, 2015:

- When designing kiosks, Cole will consider individuals with disabilities that may require access to the kiosk.

12. INFORMATION AND COMMUNICATIONS

Cole is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

Cole has taken the following steps to make all new websites and content on those sites conform to WCAG 2.0, Level A by June 30, 2015:

- Cole has set web content style guidelines to ensure the design of our website is accessible to individuals with disabilities.
- New websites and major content changes to the current website will conform to these guidelines.

Cole introduced the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by March 1, 2015:

- Organizational Development will ensure all feedback processes are accessible to individuals with disabilities.
- Currently employees are able to give feedback through the following channels:
 - In person
 - By email
 - By phone
 - In writing, through interoffice mail or

Cole introduced the following steps to make sure all publicly available information is made accessible upon request by January 1, 2016:

- Accessible formats of publically available information will be developed by January 1, 2016.

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Cole introduced the following steps to make all websites and content conform to WCAG 2.0, Level AA by January 1, 2021:

- Our websites and content was reviewed over a period of five years and a development plan was put into place to ensure that websites and content will conform by the January 1, 2021 due date.

13. DESIGN OF PUBLIC SPACES

Cole will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.

Public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals
- Accessible off street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

Cole will put the following procedures in place to prevent service disruptions to its accessible parts of its public spaces.

- In the event of a service disruption, we will notify the public of the service disruption and alternatives available.

14. FEEDBACK

Employees are encouraged to provide feedback regarding our Accessibility policies and procedures. They can do so by completing the Employment Accessibility Feedback Form that can be obtained from Emily Valbonesi (emily.valbonesi@coleintl.com)

All completed Employment Accessibility Feedback Forms and other related feedback shall be provided to the Executive Vice President and Chief Operating Officer Kyle Johnston (kyle.johnston@coleintl.com) for review.

If any complaints arise, Kyle Johnston shall investigate and address accordingly.

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15. DOCUMENTATION

A copy of these policies and procedures shall be made available to the public upon request.

The documents shall be provided or the information contained in the documents, in a format that takes into account the person's disability. The format may be agreed upon with the person with a disability.

16. RECORDS

a. Forms

- Individualized Employee Emergency Response Information
- Employment Accessibility Feedback Form
- Functional Abilities / Job Demands Assessment

b. Exhibits

- Nil

c. Retention

- Records are retained for 6 plus the current year

d. Uncontrolled Policy

- Once this procedure is printed it will become an uncontrolled document.