

Integrated Accessibility Standards Policy & Commitment Statement

Background

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”), which requires that Ontario be an accessible province by 2025. Public, private and non-profit organizations have obligations under the AODA to help make Ontario accessible. To guide organizations through that process, the AODA contains accessibility standards that assist organizations in the identification, prevention and removal of barriers to accessibility for persons with disabilities. The AODA contains accessibility standards in a variety of areas, including:

- Customer Service
- Information and Communications
- Employment
- Transportation
- Design of Public Spaces

The AODA and its standards are not a replacement or substitution for the requirements of the *Human Rights Code* (Ontario).

On July 1, 2011, the Integrated Accessibility Standards (Ontario Regulation 191/11) came into force. The regulation establishes standards to address barriers that persons with disabilities face in the areas of employment, information and communications, transportation and built environment. As a large, private sector organization, Atria Management Canada, ULC, operating business as Atria Retirement Canada (“Atria”) has obligations under the Integrated Accessibility Standards that come into effect on a rolling basis.

Purpose

The purpose of this Policy is to set out the principles that guide Atria on our path to accessibility through compliance with the AODA and, in particular, its Integrated Accessibility Standards. The Policy identifies what Atria will do in order to achieve accessibility as an organization.

Application and Scope

This policy applies to all Atria employees (including persons who participate in developing Atria’s policies), volunteers and persons who provide goods, services or facilities on behalf of Atria in Ontario. This policy will be implemented in Ontario in accordance with the timeframes established by the Integrated Accessibility Standards.

Commitment Statement

Atria is committed to identifying and meeting the accessibility needs of persons with disabilities in an effective, appropriate and timely manner through compliance with the Integrated Accessibility Standards. Atria's goal is to foster an inclusive organizational culture that is guided by the principles of the AODA and the Integrated Accessibility Standards, which include:

- Dignity
- Independence
- Integration (except when alternate measures are necessary to meet the needs of people with disabilities)
- Equal Opportunity

As a large private sector organization, Atria strives to ensure accessibility for our employees, volunteers and the people we serve.

Definitions

Accessible Formats: formats that are an alternative to standard print and are accessible to people with disabilities. They may include, but are not limited to, large print, recorded audio and electronic formats, and Braille.

Accommodation: the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on an individual's unique needs.

Assistive Devices and Measures: supports made available by providers to improve accessibility for people with disabilities, such as wheelchairs, volunteers, real-time captioning services (e.g., on-screen typing of what speakers are saying), sign language interpreters, deaf-blind interveners and Telephone Teletypes (TTY) for those who are deaf, hard of hearing, have speech impairments or are deaf-blind.

Barrier: anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

Communication Supports: supports that individuals with disabilities may need to access information. They include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability: according to the *Human Rights Code* (Ontario), as referenced by AODA, "disability" means:

- (i) 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 co-ordination, 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;

- (ii) a condition of mental impairment or a developmental disability;
- (iii) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (iv) a mental disorder;
- (v) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Disabilities may differ in severity, may be visible or invisible, and may have effects that come and go.

Feedback: any comments, compliments, suggestions or complaints provided to Atria by those we serve.

Information: includes, but is not limited to, data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.

Internet Website: a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

Kiosk: an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Mobility Aid: a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device: a cane, walker, wheelchair, scooter or similar aid.

New Internet Website: either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Redeployment: reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Standard: what, according to the AODA, a person or organization must do to achieve accessibility for persons with disabilities to whom the standard applies.

Unconvertible Information: instances in which (i) it is not technically feasible to convert the information or communications or (ii) the technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines: the World Wide Web Consortium recommendation, dated December 2008, entitled Web Content Accessibility Guidelines (WCAG) 2.0.

Requirements

1. Accessibility Policy & Commitment Statement

Atria has prepared and will maintain this document, the Integrated Accessibility Standards Policy & Commitment Statement (the "Policy"), to describe the principles that guide our path to accessibility as an organization and identify what Atria will do to meet the requirements of the Integrated Accessibility Standards. Upon request, Atria will endeavour to provide a copy of this Policy in an alternative accessible format.

2. Multi-Year Accessibility Plan

Atria has developed and will maintain a Multi-Year Accessibility Plan (the "Plan") that outlines Atria's strategy to prevent and remove barriers from our workplace and meet its requirements under the Integrated Accessibility Standards.

The Plan will be reviewed and updated at least once every five years. The Plan is posted on Atria's website in an accessible format. Upon request, Atria will endeavour to provide a copy of the Accessibility Plan in an alternative accessible format.

3. Self-service Kiosks

Although Atria currently does not use self-service kiosks, Atria will have regard to the accessibility for persons with disabilities should it design, procure or acquire self-service kiosks by considering what accessibility features could be built into kiosks to best meet the needs of our customers and clients.

4. Training

Atria will provide training to:

- all of its Ontario-based employees and volunteers,
- all persons who participate in developing Atria's policies, and
- all other persons who provide goods, services or facilities on behalf of Atria in Ontario,

on the requirements of the accessibility standards referred to in the Integrated Accessibility Standards and on the *Human Rights Code* (Ontario) as it pertains to persons with disabilities. To the extent that it has not already been provided, training will be provided as soon as practicable. Training will also be included as part of Orientation for all new hires. The training provided will take into consideration and be appropriate to the duties of those receiving the training.

Atria will provide training, on an ongoing basis, with respect to changes made to the Integrated Accessibility Policy and Commitment Statement.

Records of the training provided will be maintained and will include: (i) the dates on which training was provided and (ii) the number of individuals to whom training is provided.

5. Information and Communications

Feedback: Atria will continue to ensure that its 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.

Atria will advise the public about the availability of accessible formats and communication supports with respect to its feedback processes through a notification on our company website.

The processes that Atria develops to meet its feedback obligations under the Integrated Accessibility Standards will be complementary to, and will not detract from, the feedback processes it has developed in accordance with the Customer Service Standards.

Accessible formats and communication supports: Upon request, Atria will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.

Atria will consult with the person making the request for an accessible format or communication support when determining the suitability of an accessible format or communication support.

Atria will continue to advise the public about the availability of accessible formats and communication supports with respect to its feedback processes through a notification on our company website.

Accessible websites and web content: Atria will ensure that its internet website, including web content on such site (that Atria controls directly or through a contractual relationship that allows Atria to modify the content), conforms with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, except where meeting the requirement(s) is not practicable or required by law.

Emergency Procedure, Plans, or Public Safety Information: Atria has emergency response procedures, plans and public safety information that it makes available to the public. Upon request, Atria provides or arranges for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.

Atria will consult with the person making the request for an accessible format or communication support for the procedures, plans and public safety information when determining the suitability of an accessible format or communication support.

6. Employment

Atria's policies and practices are intended to build an inclusive and accessible work environment that is free from discrimination and harassment.

Recruitment: In our recruitment processes, Atria will advise our employees and the public about the availability of accommodation for applicants with disabilities.

Recruitment, Assessment or Selection Process: Atria will notify job 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 job applicant requests accommodation relating to their participation in the hiring process, Atria will consult with the individual and provide or arrange for the provision of suitable accommodation that takes into account the applicant's disability-related needs.

Notice to Successful Applicants: When making offers of employment, Atria will notify successful applicants of our policies for accommodating employees with disabilities.

Informing Employees of Supports: We will notify our employees of Atria's policies (and any updates to those policies) for supporting employees with disabilities, including our policies regarding the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new hires as soon as practicable after they commence employment.

Accessible Formats and Communication Supports for Employees: If an employee with a disability asks for information in an accessible format or to receive communication supports, Atria will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that the employee needs to perform his/her job, as well as information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Atria will consult with the employee making the request.

Workplace Emergency Response Information: Atria will provide individualized workplace emergency response information to employees with disabilities where the disability is such that individualized information is necessary and Atria is aware of the need for accommodation. Atria will provide workplace emergency response information as soon as practicable after learning of the need for accommodation due to an employee's disability.

Where an employee who receives individualized workplace emergency response information requires assistance, Atria will designate a person to provide assistance and, with the employee's consent, Atria will provide the workplace emergency response information to such person.

Atria will review individualized workplace emergency response information, at minimum, whenever:

- the employee moves to a different location within Atria,
- the employee's overall accommodation needs or plans are reviewed, or
- Atria reviews its general emergency response policies.

Documented Individual Accommodation Plans: Atria will develop and maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans, in accordance with the Accessible Formats and Communication Supports for Employees Standards. Additionally, the plans will include individualized workplace emergency response information (where required and in accordance with the Workplace Emergency Response Information Standard). Plans will also identify any other accommodation that is to be provided.

Return to Work Process: Atria will develop and maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will, as part of the process, outline the steps that Atria will take to facilitate the return to work and will include documented individual accommodation plans.

Atria notes that this return to work process will not replace or override any other return to work process created by or under any other statute (for example, *the Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment: Atria 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.

7. Built Environment

Outdoor Public Use Eating Areas: Atria will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop outdoor public use eating areas that we intend to maintain.

Exterior Paths of Travel: Atria will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop exterior paths of travel that we intend to maintain (including ramps, stairs, curb ramps, depressed curbs, pedestrian signals and rest areas) that are intended to serve a functional purpose, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards.

Accessible Parking: Atria will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop off-street parking facilities that we intend to maintain, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards.

Service Counters, Queuing Lines and Waiting Areas: Atria will ensure that we adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop service counters, fixed queuing guides and waiting areas.

Maintenance: Atria will ensure that the Multi-Year Accessibility Plan includes (a) procedures for preventative and emergency maintenance of the accessible elements in Atria's public spaces that are governed by the Integrated Accessibility Standards, and (b) procedures for dealing with temporary disruptions when accessible elements in Atria's public spaces that are governed by the Integrated Accessibility Standards are not in working order.