

Accessibility for Ontarians with Disabilities Act, 2005

Policy Overview

The Bauman Group Inc. (the “Company”) is committed to providing excellent services and support to all persons, including those with disabilities. Our goal is to focus on identifying, removing, and preventing barriers for persons with disabilities. This policy complies with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) (the “Act”).

Application

This policy applies to all Ontario locations.

Implementation Guidelines

This policy has been developed in accordance with the Integrated Accessibility Standards Regulations (IASR) and addresses how the Company will achieve accessibility. It provides the overall strategic direction that the Company will follow to provide accessibility supports to Ontarians with disabilities.

This document records the Company’s policies with respect to the Act but recognizing that the Company plans to implement the measures included in this policy, at the latest, in accordance with the compliance schedule provided by the IASR, or as soon as possible.

Definitions

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.

Accommodation means 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 the person’s unique needs.

Career development and advancement includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.

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.

Performance management means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

Persons with disabilities means those individuals that are afflicted with a disability as defined under the Ontario Human Rights Code.

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

General Training Information

The Company will provide training on the requirements of the accessibility standards in the IASR and on the Human Rights Code as it pertains to persons with disabilities to:

- All employees and volunteers (if applicable);
- All persons who participate in developing the Company's policies; and
- All other persons who provide goods, services, or facilitates on behalf of the Company.

The Company further confirms that training will be:

- Appropriate to the duties of the employees, volunteers, and other persons.
- Provided as soon as practicable.
- Provided on an ongoing basis in respect of any changes to accessibility policies on an ongoing basis.

The Company shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.

Four Guiding Principles

The Company is committed to ensuring that its policies, practices, and procedures are aligned with the following core principles, as outlined in the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

- **Dignity.** Ensure persons with disabilities are provided with services in a manner that will allow them to maintain self-respect and the respect of others.
- **Independence.** Ensure persons with disabilities have the right to work on their own and can-do things in their own way.
- **Integration.** Ensure persons with disabilities fully benefit from the same goods and services, in the same place and in the same or comparable manner as others. This may require alternative formats and flexible approaches. It means complete and full participation.
- **Equal Opportunity.** Ensure persons with disabilities have the same chances, options, benefits, and results as others.

Integrated Accessibility Standards Regulations (IASR)

The Integrated Accessibility Standards Regulations (IASR) are a grouping of standards that the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) has developed and implemented to break down barriers and increase accessibility for persons with disabilities. The Integrated Accessibility Standards Regulations (IASR) consist of four principal areas that are applicable to the Company, which are:

- Customer Service Standards
- Information and Communication Standards
- Employment Standards
- Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

Customer Service Standards

The Company is committed to using all reasonable efforts to provide goods and services to all customers, including those with disabilities, and will carry out all procedures and responsibilities in the following areas:

- **Communication.** The Company is committed to ensuring that our employees are fully aware of how to interact and communicate with persons with disabilities. We will train our employees who communicate with customers on how to interact and communicate with people with various types of disabilities.
- **Assistive Devices.** The Company is committed to serving persons with disabilities who may use assistive devices to obtain, use, or benefit from goods and/or services. We will ensure that employees are aware of and become familiar with various assistive devices that may be used while accessing our goods and/or services.
- **Use of Service Animals.** The Company is committed to welcoming persons with disabilities and their service animals to the parts of our premises that are open to the public and other third parties and will permit the person to keep the service animal with them. The Company will also ensure that all persons to whom this policy applies have been trained on how to interact with persons with disabilities who are accompanied by a service animal. If the service animal is excluded by law from the Company premises, the Company shall ensure that measures are available to permit persons with disabilities to access goods and services through other means. A service animal means a “guide dog” as defined by the Blind Persons Rights Act, or any other animal if:
 - The animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, because of visual indicators such as the vest or harness worn by the animal; or
 - If the person provides a letter from a regulated health professional listed below confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario
 - A member of the College of Physicians and Surgeons of Ontario
 - A member of the College of Chiropractors of Ontario
 - A member of the College of Physiotherapists of Ontario
 - A member of the College of Nurses of Ontario
 - A member of the College of Psychologists of Ontario
 - A member of the College of Occupational Therapists of Ontario
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario
 - A member of the College of Optometrists of Ontario
- **Use of Support Persons.** A support person means, in relation to a person with a disability, another person who accompanies the person with a disability to assist with communication, mobility, personal care, or medical needs or with access to goods or services. The person in question need not be a person who is paid for such support services to be considered a “support person.” The Company is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the Company’s premises with his or her support person. 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 the Company premises. If a fee is charged in relation to a support person’s presence on the Company premises, advanced notice of the fee will be provided. On occasion, persons with disabilities require the assistance of a support person. If necessary, the

Company may require a person with a disability to be accompanied by a support person while on the Company premises, but only if, after consulting with the person with a disability and considering the available evidence, the Company determines that, 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 protect the health or safety of the person with a disability and the health or safety of others on the premises. If the Company requires a person with a disability to be accompanied by a support person when on the premises, the Company will waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.

- **Notice of Temporary Disruption.** We will provide visitors with notice in the event of a planned or unexpected temporary disruption in the Company offices or services usually used by persons with disabilities. Notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services that may be available. Notice will be given by posting the information in a visible place on premises owned or operated by the provider of services. Should an unexpected disruption occur, notice will be given as soon as possible.
- **Training.** The Company will comply with training requirements set out by legislation with respect to harassment and discrimination as required. The Company will ensure appropriate levels of training under the AODA are provided to all employees and volunteers, every person who participates in developing the Company's policies and every other person who provides goods, services, or facilities on behalf of the Company. Training includes the following topics:
 - The purpose of the AODA, 2005.
 - The requirements of the Accessibility Standards for Customer Service relating to interacting and communicating with people with various types of disabilities.
 - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person.
 - How to use the assistive devices available on the Company premises and otherwise made available by the Company to persons with disabilities.
 - What to do if a person with a disability is having difficulty accessing the Company's policies, practices, and procedures relating to the provision of goods and services to the public and other third parties.
- **Customer Feedback Process.** Comments and feedback about the delivery of services to persons with disabilities are welcome, as it may help identify areas that require change and assist in continuous improvement. Such contact can be made by emailing HR at suzanne@amurhr.ca. Any person that provides comments and feedback can expect a response within thirty (30) business days. Please note that, in some cases (i.e., the person has asked to remain anonymous/the person indicates that they do not wish to receive a response), a response may not be provided. The response will include information on how the Company has addressed or will address the comment(s)/feedback, any actions that have been or will be taken to do so, and an estimate of how long it will take to complete those actions.
- **Availability of The Company's AODA Policy.** In accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), this policy will be made available to any person upon request.

Information & Communication Standards

- **Feedback.** The Company will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of

accessible formats and communications supports, upon request.

- **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 a timely manner that considers the person's accessibility needs due to disability. The Company will consult with the person making the request in determining the suitability of an accessible format or communication support. The Company will also notify the public about the availability of accessible formats and communication supports.
- **Accessible Websites and Web Content.** The Company will make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA in accordance with the following schedule:
 - New internet websites and web content on those sites created after January 1, 2014, must conform with WCAG 2.0 Level A.
 - All internet websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded) after January 1, 2021.

Employment Standards

- **Recruitment, Assessment, and/or Selection Process.** The Company will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. The Company will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodation is available upon request in relation to the materials or processes to be used. If a selected applicant requests accommodation, we will consult with the applicant and provide, or arrange for the provision of, suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.
- **Notice to Successful Applicants.** When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities.
- **Informing Employees of Supports.** The Company will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that considers an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.
- **Accessible Formats and Communications 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 their job and information that is available to other employees. In determining the suitability of an accessible format or communication support, we will consult with the employee making the request.
- **Workplace Emergency and Fire Evacuation Procedure Information.** If applicable, the Company will provide individualized workplace emergency and fire evacuation procedure information to employees who have a disability. If the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability, we will provide this information as soon as practicable after becoming aware of the need for accommodation. Where the employee requires assistance, the Company will, with the

consent of the employee, provide the workplace emergency and fire evacuation procedure information to the person designated by the Company to aid the employee. The Company will review the individualized workplace emergency and fire evacuation procedure information for each site, and when the employee's overall accommodation needs/plans are reviewed.

- **Performance Management, Career Development, and Advancement/Redeployment.** The Company will consider 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.
- **Documented Individual Accommodation Plans.** The Company has a process in place for the development of documented individual accommodation plans for employees with disabilities. This process includes the following elements:
 - The way an employee requesting accommodation can participate in the development of the individualized accommodation plan.
 - The means by which an employee is assessed on an individual basis.
 - The way the Company can request an evaluation by an outside an outside medical/other expert, at the Company's expense, to assist the Company in determining if accommodation can be provided and, if so, how accommodation can be provided.
 - 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 way it will be done.
 - If an individual accommodation plan is denied, the reason for the denial will be provided to the employee.
 - The means of providing the individual accommodation plan in a format that considers the employee's accessibility needs due to disability.

Documented individual accommodation plans will:

- If requested, include any information regarding accessible formats and communications supports provided, as required by the Standard;
- If required, include individualized workplace emergency response information, as required in the Standard; and
- Identify any other accommodation that is to be provided.

Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

The Company will follow the standards set out in the Design of Public Spaces Standards in circumstances where it qualifies as an obligated organization under the Act and constructs or redevelops any public space to which the Act applies.

Additionally, the Company's policies for preventative and emergency maintenance will apply equally to the accessible elements of any public spaces within our built environment to which the Act applies.

Where accessible elements attached to any public spaces to which the Act applies are not in working order due to temporary disruptions, the Company will comply with the "Notice of Temporary Disruption" policy in this document.

Accommodation in the Workplace

Accommodation will be provided in accordance with the principles of dignity, individualization, and inclusion. The Company will work cooperatively, and in a spirit of respect, with all partners in the accommodation process. This policy applies to all parties acting on behalf of the Company (i.e., employees, contractors, sub-contractors, etc.) and applies to all aspects of the employment relationship, including recruitment and selection, promotions and transfers, discipline, and conditions of work (i.e., leaves of absence, hours of work, etc.).

Accommodation Request Process

HR is responsible for dealing with all requests for accommodation and will keep the President apprised of any accommodation requests. Accommodation requests should, when possible, be made in writing. The accommodation request should indicate the following:

- The nature of the request for accommodation.
- The reason accommodation is required, which includes enough information to confirm the existence of a need for accommodation.
- Any other information to confirm the existence of the need for accommodation and the measures of accommodation required.

All accommodation requests will be taken seriously, and no person will be penalized for making an accommodation request. The person responsible for dealing with the accommodation request will do so in a timely way. This may include seeking external help from professionals experienced in determining the appropriate accommodation. Several accommodation strategies may be used to fulfill the Company's obligation. In the interest of both prompt attention to the needs of an individual and the need to explore the utility of various accommodation strategies, an interim or experimental strategy may be implemented.

Undue Hardship

Accommodation will be provided to the point of undue hardship, as defined by the Ontario Human Rights Commission's Policy and Guidelines on Disability and the Duty to Accommodate. A determination regarding undue hardship will be based on an assessment of costs, outside sources of funding, and health and safety. It will be based on objective evidence. A determination that accommodation will create undue hardship may only be made by the Company. In determining undue hardship, the Company will only consider the following factors:

- Cost
- Outside sources of funding (if any)
- Health and safety requirements (if any)

Where a determination is made that accommodation would create undue hardship, the person requesting accommodation will be given written notice, including the reasons for the decision and the objective evidence relied upon. The accommodation seeker shall be informed of his or her recourse under the Ontario Human Rights Code.

For any person that has questions about The Bauman Group Inc.'s policies on accessibility, please contact HR.