

| Procedure Title: | | | |
|---|---|----------------------------------|--|
| 5 Year Accessibility Plan and Customer Service Requirement | | | |
| Enterprise Process: | | Provide Legal Services | |
| Procedure Owner: | | Human Resources | |
| Procedure No.: | Procedure Level: (Tier 1, 2, 3, 4) | Revision Owners: | |
| LS EHS-08 | Tier 3 | EHS | |
| Approver's Title: | Name: | Approval: [Signature] | Signature Date: [DD-MMM-YYYY] |
| Manager, Talent Acquisition & Development | ██████████ | ██████████ | 01-May-2022 |
| Manager, EHS Labour Relations, EH&S and Security | ██████████ | ██████████ | 31-May-2022 |
| Manager, Total Rewards & Global Mobility | ██████████ | ██████████ | 31-May-2022 |
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1.0 PURPOSE AND SCOPE

- 1.1 The Integrated Accessibility Standards Regulations (IASR) requires organizations to develop, implement and maintain at least one written plan that outlines how the company intends to comply with the requirements of the regulation.
- 1.2 The ultimate goal of this regulation is to give people with disabilities the same opportunity to access our products and services and allow them to benefit from the same product and services, in the same place and in a similar way as other clients.
- 1.3 The purpose of the plan is to describe and document the method by which GDLS-C ensures that we meet the requirements of the IASR.
- 1.4 This Plan applies to all GDLS-C facilities in Ontario.

| <i>Cause of: Quality Failure, Environmental Aspect, Health & Safety Hazard and/or Deviation in Energy Performance</i> | <i>Risk (impact/effect)</i> |
|--|------------------------------------|
| <i>Noncompliance to legislation</i> | <i>Fines, Orders, Litigation</i> |

2.0 RESPONSIBILITY

- 2.1 The Accessibility Team is made up representatives from Security, Environmental Health and Safety, Salaried HR, Labour Relations. This team is responsible for maintenance, review and communication of this of this plan.
- 2.2 This plan is reviewed by the team at least once every 5 years.

3.0 INTERESTED PARTIES

- 3.1 GDLS-C Leadership
- 3.2 GDLS-C Employees

3.3 Government Officials

4.0 **DEFINITIONS OF TERMS**

4.1 **AODA** - Accessibility for Ontarians with Disabilities Act

4.2 **Accessibility Directorate of Ontario** - The organization within the Ontario government that is responsible for day-to-day administration of the AODA.

4.3 **Accessibility report** - A report that a person or organization must file if an accessibility standard applies to the person or organization.

4.4 **Accessibility standard** - An accessibility standard is a rule that persons and organizations have to follow to identify, remove and prevent barriers.

4.5 **Assistive Devices Assistive technology** - is a term used to describe the various forms of devices such as assistive, adaptive, and rehabilitative devices used to assist persons with disabilities. These devices are used to support the needs of the individual person and specific disability by enabling them to perform tasks that they may not have been able to accomplish formerly.

Examples of assistive devices include hearing aids, speech amplification devices, white canes, wheelchairs, screen readers, etc. Ontario Employers are not responsible for providing any assistive devices.

4.6 **Barrier** - Anything that keeps a person with a disability from participating fully in society because of his or her disability.

4.7 **Disability** - The AODA uses the Ontario Human Rights Code definition of “disability” which is:

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

- a condition of mental impairment or a developmental disability

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- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder, or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997 (“handicap”).

4.8 Service Animals, Guide Dogs and Support Persons - With certain types of disabilities, an animal may be more of an assistive form of aid rather than a device. These service animals are trained to carry out certain tasks that help people with disabilities. There are three types of assistive animals that have been categorized by the international assistance animal community:

1. Guide Animals: Used to guide the blind
2. Hearing Animals: Used to help signal the hearing impaired
3. Service Animals: Used to do work for persons with disabilities other than blindness or deafness

4.9 Organization - Any public or private sector organization in Ontario.

5.0 PROCEDURE

2012 Customer Service Requirements

Customer Service Requirements

Customer Service Standard - January 1, 2012

| Requirement | Description | Plan | Procedures/Documents Updated | Team | Complete |
|---------------------------------|--|---|---|--|----------|
| Service Animals/Support Persons | 4. (1) This section applies if goods or services are provided to members of the public or other third parties at premises owned or operated by the provider of the goods or services and if the public or third parties have access to the premises. O. Reg. 429/07, s. 4 (1).(2) If a person with a disability is accompanied by a guide dog or other service animal, the provider of goods or services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises. O. Reg. 429/07, s. 4 (2).(4) If a person with a disability is accompanied by a support person, the provider of goods or services shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises. O. Reg. 429/07, s. 4 (4).(5) The provider of goods or services may require a person with a disability to be accompanied by a support person when on the 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 | GDLS-C will welcome people with disabilities and their service animals into our workplace. Service animals are allowed on parts of our premises.. A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. GDLS-C will notify customers of this GDLS-C Accessibility Policy. NOTE: There may be some areas in the facility where | <p>Procedures/Policy GDLS-C Accessibility Policy EHS-HBK-02 Service Provider Handbook EHS 4.4.6Pb Visitor and Service Provider Contractor Management Procedure</p> <p>Forms GDLS-C 5470A Visitor Registration Form - Visitor GDLS-C5470B- Visitor Registration Form – Host GDLS-C 5575 – Service Provider Identification Form or Emergency/short notice visit GDLS-C 5463 – Security Assessment Application for Service Providers</p> | <p>Lead- EHS Area Manager</p> <p>Team – Area Manager Security Services Trade Compliance</p> | Complete |

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premises. O. Reg. 429/07, s. 4 (5).(7) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare one or more documents describing its policies, practices and procedures with respect to the matters governed by this section and, upon request, shall give a copy of a document to any person. O. Reg. 429/07, s. 4 (7).

the safety of the animals may be compromised and thus the service animals will not be allowed in these locations).

Customer Services Requirements

Customer Service Standard - January 1, 2012

| Requirement | Description | Plan | Procedures/Documents Updated | Team | Complete |
|--------------------------------|---|--|--|---|----------|
| Notice of Temporary Disruption | 5. (1) If, in order to obtain, use or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the provider and if there is a temporary disruption in those facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 429/07, s. 5 (1).(2) Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. O. Reg. 429/07, s. 5 (2). (3) Notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider of goods or services, by posting it on the provider's website, if any, or by such other method as is reasonable in the | In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, GDLS-C will notify customers promptly. A clearly posted notice will include information about the reasons for the disruption, its anticipated length of time and a | Procedures/Policy GDLS-C Accessibility Policy Form Template- Notice of Temporary Disruption | Lead- EHS Area Manager Team - Facilities Engineering Area Manager, Maintenance Area Manager | Complete |

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circumstances. O. Reg. 429/07, s. 5 (3). (4) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare a document that sets out the steps to be taken in connection with a temporary disruption and, upon request, shall give a copy of the document to any person. O. Reg. 429/07, s. 5 (4).

description of alternative facilities or services, if available. The notice will be posted at the point of service or facility disruption.

Customer Services Requirements

Customer Service Standard - January 1, 2012

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|-------------|---|--|---|--|----------|
| Training | 6. (1) Every provider of goods or services shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities: 1. Every person who deals with members of the public or other third parties on behalf of the provider, whether the person does so as an employee, agent, volunteer or otherwise. 2. Every person who participates in developing the provider's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. O. Reg. 429/07, s. 6 (1). (2) The training must include a review of the purposes of the Act and the requirements of this Regulation and instruction about the following matters: 1. How to interact and communicate with persons with various types of | GDLS-C will provide accessible customer service training to ALL employees, and others who deal with the public or other third parties on our behalf which includes all the requirements of training as per the standard. This training will include. Purpose of the Accessibility for | Training Program Employees have received training in the Customer Service Standard (OLT-0225 Customer Service Standard.) Procedures ISO-3 Procedure V Training EHS 4.4.2 EHS Training Note: Starting in the first quarter of 2015 all new employees will receive training upon hire and have 2 weeks to complete. This training will also incorporate | Lead: EHS Specialist Team - Talent Development | Complete |

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| | <p>disability. 2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person. 3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability. 4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services. O. Reg. 429/07, s. 6 (2). (3) The training must be provided to each person as soon as practicable after he or she is assigned the applicable duties. O. Reg. 429/07, s. 6 (3). (4) Training must also be provided on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities. O. Reg. 429/07, s. 6 (4). (5) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare a document describing its training policy, and the document must include a summary of the contents of the training and details of when the training is to be provided. O. Reg. 429/07, s. 6 (5). (6) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall keep records 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. O. Reg. 429/07, s. 6 (6).</p> | <p>Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard. Policies related to the customer service standard how to interact and communicate 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 a support person how to use the equipment or devices available, what to do if a person with disabilities is having difficulty accessing goods and services.</p> | <p>the required AODA and Human Rights Training (new OLT code will be issued). Employees will be retrained as changes occur.</p> | |
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Customer Service Requirements

Customer Service Standard - January 1, 2012

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|------------------|--|---|---|--|----------|
| Feedback Process | 7. (1) Every provider of goods or services shall establish a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and shall make information about the process readily available to the public. O. Reg. 429/07, s. 7 (1). (2) The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise. O. Reg. 429/07, s. 7 (2). (3) The feedback process must specify the actions that the provider of goods or services is required to take if a complaint is received. O. Reg. 429/07, s. 7 (3). (4) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare a document describing its feedback process and, upon request, shall give a copy of the document to any person. O. Reg. 429/07, s. 7 (4). | Customers who wish to provide feedback on the way we provide goods and services to people with disabilities can contact the EHS Area Manager. Customers can expect to hear back within ten (10) business days. Complaints will be addressed according to GDLS-C regular complaint management procedures. GDLS-C feedback process is readily available to the public and can be found posted in the lobby and in the GDLS-C Website. It is available upon request in an accessible format. | Procedures/ Policy GDLS-C Accessibility Policy GDLS-C Visitor Pamphlet ISO3 Communication Procedure GDLS-C Website | Lead: EHS Area Manager Team - Area Manager Security Services, Business Development | Complete |

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|--|---|---|--|---|----------|
| Notice of Availability of Documents and format | 8. (1) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents required by this Regulation are available upon request. O. Reg. 429/07, s. 8 (1). (2) The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 429/07, s. 8 (2). | GDLS-C will notify the public that the required documents related to accessible customer services, are available upon request and in the format determined by the customer and GDLS-C by posting a notice in all reception areas. | Procedures/ Policy GDLS-C Accessibility Policy | Lead: EHS Area Manager Team - Area Manager, Security Services | Complete |
|--|---|---|--|---|----------|

Customer Services Requirements

Customer Service Standard - January 1, 2012

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|---------------------|---|---|--|---|----------|
| Format of Documents | 8. (1) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents required by this Regulation are available upon request. O. Reg. 429/07, s. 8 (1). (2) The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 429/07, s. 8 (2). | GDLS-C will post a notice in lobbies and on the GDLS-C Website notifying customers that the documents required by this regulation are available upon request. | Procedures GDLS-C Accessibility Policy Other GDLS-C Website | Lead: EHS Area Manager Team - Manager of Security Services , Business Development | Complete |

5 Year Accessibility Plan

INTEGRATED ACCESSIBILITY STANDARDS - Employment Standards - January 1, 2012

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|--|--|---|---|--|----------|
| Individualized Emergency Response Procedures | <p>Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. O. Reg. 191/11, s. 27 (1).(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. O. Reg. 191/11, s. 27 (2). (3) Employers shall 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. O. Reg. 191/11, s. 27 (3). (4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. O. Reg. 191/11, s. 27 (4). (5) Every employer shall meet the requirements of this section by January 1, 2012. O. Reg. 191/11, s. 27 (5)</p> | <p>GDLS-C will offer to create an individualized Emergency Response Procedures for those employees with disabilities or customers requesting them. Customers will be asked if they require plans on the access forms. Employees will be asked annually during the Emergency Response Training Safety Talk. If an employee requests the development of an Individualized Emergency Response Procedure the EHS department in conjunction with the employee will create one to suit the employee's needs. The procedure will be reviewed as required but at least annually during Emergency Response Procedure Review.</p> | <p>Procedure 4.4.7 Emergency Control Plan</p> <p>Forms GDLS-C 0499 Individual Emergency Plan Form GDLS-C 5470A Visitor Registration Form - Visitor GDLS-C5470B- Visitor Registration Form – Host GDLS-C 5575 – Service Provider Identification Form or Emergency/short notice visit GDLS-C 5463 – Security Assessment Application for Service Providers</p> | <p>Lead : Area Manager, EHS, Area Manager, Security Services</p> | Complete |

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Integrated Accessibility Standards

➤ 2014 General Requirements

5 Year Accessibility Plan

INTEGRATED ACCESSIBILITY STANDARDS - General Requirements - January 1, 2014

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|--------------------|---|---|--|-------------------------------|----------|
| Accessibility Plan | 4. (1) The Government of Ontario, Legislative Assembly, designated public sector organizations and large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years. O. Reg. 191/11, s. 4 (1). | Plan created posted on website, and will be available in accessible format upon request and updated at regular intervals not to exceed 5 years. | Procedure/Policy 5 Year Accessibility Plan | Lead: EHS Area Manager | Complete |

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| Establishment of accessibility policies | 3. (1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation. O. Reg. 191/11, s. 3 (1). (2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies. O. Reg. 191/11, s. 3 (2). (3) The Government of Ontario, the Legislative Assembly, every designated public sector organization and large organizations shall, (a) prepare one or more written documents describing its policies; and (b) make the documents publicly available, and shall provide them in an accessible format upon request. O. Reg. 191/11, s. 3 (3). | Policy will be developed and posted on website as well as in the lobbies. In addition the following procedures will be updated to include requirements for accessibility for people with disabilities | Procedures/Policy GDLS-C Accessibility Policy EHS-HBK-02 Service Provider Handbook EHS 4.4.6Pb Visitor and Service Provider Contractor Management Visitor Pamphlet 2016 (See 2016 requirements) EHS-19 Accommodation Procedure ISO-3 Procedure VI - Training EHS 4.4.2 EHS Training ISO-3 Procedure V Communication job postings, and job offers Return to Work (SA), Performance Management, Recruiting, Redeployment | Lead-EHS Area Manager Emergency Response & Training, Accommodation & Return to Work Lead- Employee Relations- Performance Management Lead-Recruitment and Selection- Recruitment/Internal Movement | Complete |
| Integrated Accessibility Standards ➤ 2015 General Requirements ➤ 2015 Information and Communication Standard | | | | | |
| Accessibility Plan | | | | | |
| INTEGRATED ACCESSIBILITY STANDARDS - General Requirements - January 1, 2015 | | | | | |

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|--|--|--|---|---|----------|
| Training | 7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization. O. Reg. 191/11, s. 7 (1). (2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons. O. Reg. 191/11, s. 7 (2). (3) Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 191/11, s. 7 (3). (4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis. O. Reg. 191/11, s. 7 (4). | Training will be completed on the Customer Service Requirements, AODA Standards and the Human Rights Code via the Learning Management System. Completion will be tracked. All "New" hires will receive training in "New Hire Orientation" and have 2 weeks to complete. Employees training will be refreshed as requirements change. Meets requirements with training. | Procedures ISO-3 Procedure V Training EHS 4.4.2 EHS Training 2015 | Lead: EHS Specialist Talent Development | Complete |
| INTEGRATED ACCESSIBILITY STANDARDS - Information and Communication Standard - January 1, 2015 | | | | | |
| Feedback | 11. (1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. O. Reg. 191/11, s. 11 (1). | A contact phone number name and email will be added to the website as well to the GDLS-C Accessibility Policy. Documents will be accessible in various formats upon request. | Procedure/Policy GDLS-C Accessibility Policy Other External Website | Lead-EHS Area Manager Business Development | Complete |
| Integrated Accessibility Standards | | | | | |

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➤ 2016 Employment Standards

➤ Information and Communication Standard

5 Year Accessibility Plan

INTEGRATED ACCESSIBILITY STANDARDS - Employment Standard - January 1, 2016

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
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| Recruitment | 22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. O. Reg. 191/11, s. 22. | All job postings will have a statement of the availability of accommodation for applicants with disabilities | Other Job postings | Lead Recruitment and Selection EHS Talent Development | Complete |
| | 23. (1) During a recruitment process, an employer shall 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. O. Reg. 191/11, s. 23 (1). | All individuals scheduled for an interview will be asked if they require accommodation. | Procedure/Policy EHS-19 (AF) Accommodation Forms GDLS-C 6079, Interview Schedule Form GDLS-C 5470A Visitor Registration Form - Visitor GDLS-C5470B- Visitor Registration Form – Host GDLS-C 6069 Employee Request for Accommodation Accommodation Plans | | Complete |

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| | 24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. O. Reg. 191/11, s. 24. | All new hires will receive training in GDLS-C policies for accommodating employees with disabilities. Must be completed within 2 weeks of hire. Meet requirement through New Hire Orientation Training. | Procedures/Policy ISO-3 Procedure V Training EHS 4.4.2 EHS Training 2015 EHS-19 (AF) Accommodation Forms GDLS-C 0537 Individualized Accommodation Plans GDLS-C 6069 Employee Request for Accommodation Other Accommodation pamphlet | | Complete |
|--|---|---|---|------|----------|
| 5 Year Accessibility Plan | | | | | |
| INTEGRATED ACCESSIBILITY STANDARDS - Employment Standard - January 1, 2016 | | | | | |
| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |

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| Information for Employees | <p>Every employer shall inform its employees of its policies used to support its 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. O. Reg. 191/11, s. 25 (1). (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. O. Reg. 191/11, s. 25 (2). (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. O. Reg. 191/11, s. 25 (3).</p> | <p>We will use various communication methods/formats to communicate our procedures and policies.</p> | <p>Procedures EHS-19 (AF) Accommodation Forms GDLS-C 6069 Employee Request for Accommodation GDLS-C 0537 Individualized Accommodation Plans Other Training, newsletters, emails, memos, website, bulletin boards, meetings, one on one conversations, pamphlets</p> | <p>Lead-EHS Claims Coordinator Payroll and Benefits, Medical Center, Employee Relations</p> | Complete |
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| | In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace. O. Reg. 191/11, s. 26 (1). (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 26 (2). | GDLS-C will provide accessible format documentation to employees that request it and communicate the availability of this. | Procedures EHS-19 (AF) Accommodation Forms GDLS-C 6069 Employee Request for Accommodation GDLS-C 0537 Individualized Accommodation Plans Other Training, newsletters, emails, memos, website, bulletin boards, meetings, one on one conversations, pamphlets | Complete |
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5 Year Accessibility Plan

INTEGRATED ACCESSIBILITY STANDARDS - Employment Standard - January 1, 2016

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|----------------------------------|--|---|--|--|----------|
| Process to Accommodate Employees | Documented individual accommodation plans 28. (1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the | GDLS-C will create and document accommodation plans for those employees that request such. These plans will meet all the requirements of the IAS. | Procedures EHS-19 (AF) Accommodation Forms GDLS-C 6069 Employee | Lead-EHS Area Manager Employee Relations, Medical, | Complete |

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| | <p>development of documented individual accommodation plans for employees with disabilities. O. Reg. 191/11, s. 28 (1). (2) The process for the development of documented individual accommodation plans shall include the following elements: The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the</p> | | <p>Request for Accommodation GDLS-C 0537 Individualized Accommodation Plans GDLS-C 0536 Functional Capacity Assessment Form Other Training, newsletters, emails, memos, website, bulletin boards, meetings, one on one conversations, pamphlets</p> | <p>Labour Relations, Claims Management</p> | |
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privacy of the employee's personal information.

6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.

7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.

8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. O. Reg. 191/11, s. 28 (2). Individual accommodation plans shall,

(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;

(b) if required, include individualized workplace emergency response information, as described in section 27; and (c) identify any other accommodation that is to be provided. O. Reg. 191/11, s. 28 (3).

5 Year Accessibility Plan

INTEGRATED ACCESSIBILITY STANDARDS - Employment Standard - January 1, 2016

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| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
|------------------------|--|---|---|---|----------|
| Return to work process | 29 (1) Every employer, other than an employer that is a small organization, (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and (b) shall document the process. O. Reg. 191/11, s. 29 (1). (2) The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and (b) use documented individual accommodation plans, as described in section 28, as part of the process. O. Reg. 191/11, s. 29 (2). (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute. O. Reg. 191/11, s. 29 (3). | GDLS-C will create and document a procedure for return to work. This procedure will meet all the requirements of the IAS. | Procedures EHS-19 (AF) Accommodation Forms GDLS-C 6069 Employee Request for Accommodation GDLS-C 0537 Individualized Accommodation Plans GDLS-C 0536 Functional Capacity Assessment Form | Lead- Area Manager EHS Payroll and Benefits, Employee Relations, Labour Relations, Medical, Claims Management | Complete |

5 Year Accessibility Plan

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| INTEGRATED ACCESSIBILITY STANDARDS - Employment Standard - January 1, 2016 | | | | | |
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| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
| Performance Management | 30. (1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. O. Reg. 191/11, s. 30 (1). (2) In this section, "performance management" means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success. O. Reg. 191/11, s. 30 (2). | GDLS-C will take in to consideration the accessibility need of employees with disabilities when using performance management. | Procedures EHS-19 (AF) Accommodation Return to Work Procedure Forms GDLS-C 6069 Employee Request for Accommodation GDLS-C 0537 Individualized Accommodation Plans Supervisor Training | Lead – Employee Relations EHS | Complete |

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| Career development and advancement | 31. (1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. O. Reg. 191/11, s. 31 (1).(2) In this section, "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. O. Reg. 191/11, s. 31 (2). | GDLS-C will take in to account during career development and advancement the accessibility need of employees with disabilities | Procedures EHS-19 (AF) Accommodation Return to Work Procedure Forms GDLS-C 6069 Employee Request for Accommodation Accommodation Plans GDLS-C 0537 Individualized Accommodation Plans Supervisor Training | Lead – Talent Development Employee Relations, Labour Relations | Complete |
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Accessibility Plan

INTEGRATED ACCESSIBILITY STANDARDS - Employment Standard - January 1, 2016

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
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| Redeployment | <p>32. (1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. O. Reg. 191/11, s. 32 (1).</p> <p>(2) In this section, "redemption" means the 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 by the organization. O. Reg. 191/11, s. 32 (2).</p> | GDLS-C will take into consideration the accessibility needs of employees with disabilities as well as their accommodation plans when redeploying employees. | <p>Procedures EHS-19 (AF) Accommodation Return to Work Procedure</p> <p>Forms GDLS-C 6069 Employee Request for Accommodation GDLS-C 0537 Individualized Accommodation Plans</p> | <p>Lead- Workforce Management and Labour Relations EHS, Recruiting Employee Relations</p> | Complete |
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5 Year Accessibility Plan

INTEGRATED ACCESSIBILITY STANDARDS -Information and Communication Standard - January 1, 2016

| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |
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| Accessible formats and communication support | 12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons. O. Reg. 191/11, s. 12 (1). (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 12 (2). (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. O. Reg. 191/11, s. 12 (3). | GDLS-C will provide accessible formats and communication supports to those individuals that request such. | Procedures/Policy GDLS-C Accessibility Policy EHS-HBK-02 Service Provider Handbook EHS 4.4.6Pb Visitor and Service Provider Contractor Management Visitor Pamphlet EHS-19 (AF) Accommodation Return to Work Procedure Forms GDLS-C 6069 Employee Request for Accommodation GDLS-C 0537 Individualized Accommodation Plans GDLS-C 0536 Functional Capacity Assessment Form Success Factors | Lead – EHS Communications Employee Relations, Talent Development | Complete |
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| 2020 Compliance Report | | | | | |
| Requirement | Description | Plan | Procedures Documents Updated | Team | Complete |

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| Accessibility Compliance Report | Responses to the questions on the accessibility report indicate that your organization is in compliance with AODA standards. Section 15 of the <i>Accessibility for Ontarians with Disabilities Act, 2005</i> requires that accessibility reports include a statement certifying that all the required information has been provided and is accurate, signed by a person with authority to bind the organization(s). | Complete all steps of the report, answering various questions based on the requirements that apply to the organization category and number of employees range. | None | Certifier: [REDACTED] Primary Contact: [REDACTED] | Complete |
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