

E. Manson Investments Limited

Accessibility for Ontarians with Disabilities Act (AODA) Policy and Plan



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1. Purpose and Scope of the Policy

The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) established a process to develop, implement and enforce accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises by January 1, 2025.

Ontario Regulation 429/07, entitled “Accessibility Standards for Customer Service”, came into force on January 1, 2008 and established accessibility standards relating to customer service for organizations that provide goods and services to members of the public or other third parties.

E. Manson Investments Limited (“EMI”) is committed to providing accessible customer service to persons with disabilities, and the purpose of this policy is to specifically address our commitments in the following areas:

- Communicating with persons with disabilities
- The use of assistive devices, service animals and support persons by persons with disabilities
- Notice of temporary disruptions in services and facilities
- Staff training
- Customer feedback regarding the provision of goods and services to persons with disabilities

Ontario Regulation 191/11, entitled *Integrated Accessibility Standards Regulation* (“IASR”), under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”), came into force on July 1, 2011 and established standards to address barriers that persons with disabilities face in the areas of information and communications, employment, transportation, and the design of public spaces.

E. Manson Investments Limited (“EMI”) is committed to meeting the needs of persons with disabilities, and the purpose of this policy is to specifically address our commitments in the following areas:

- Training
- Information and Communication, including websites
- Employment
- Design of Public Spaces

This policy applies to all EMI employees, contractors and other individuals engaged in business on behalf of EMI. This policy extends to each and every level within our organization.

2. Policy Statement

EMI recognizes the importance of accessibility for persons with disabilities and is committed to the principles of accommodation outlined in the AODA, the customer service standard and the Ontario Human Rights Code. Additionally, EMI recognizes that its practices and procedures relating to information and communications, employment, transportation, and the design of public spaces for persons with disabilities are to be guided by the principles of dignity, independence, integration and an equality of access.

3. Definitions

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 technological barrier, a policy or a practice.

Disability

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

Guide Dog

A dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.

Service Animal

An animal is a service animal for a person with a disability,

- a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or

- b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person

In relation to a person with a disability, a support person is someone who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

4. Accessibility Standards for Customer Service

Communicating with persons with disabilities

EMI is committed to communicating with persons with disabilities in a manner that takes into account their disability and meets their needs. Customers and third parties are encouraged to identify any barriers to communication that they are experiencing to assist EMI in meeting this commitment.

The use of assistive devices, service animals and support persons by persons with disabilities

Persons with disabilities who use assistive devices are encouraged to use their devices as necessary in order to use or benefit from the services provided by EMI. EMI employees will be trained so as to be familiar with various assistive devices that may be used by customers with disabilities while accessing services.

EMI welcomes persons with disabilities who are accompanied by a service animal, and the service animal may access any of EMI's premises that are open to the public.

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them anywhere on EMI's premises and at no time will EMI prevent a person from having access to his or her support person. When EMI employees need to discuss confidential information with a person who is accompanied by a support person, the person with a disability will be asked whether they wish to have their support person remain present prior to any discussion of confidential information.

Notice of temporary disruptions in services and facilities

In the event of a planned or unexpected disruption to services or facilities provided by EMI and used by persons with disabilities, including a power outage, disruption in elevator service or reduced access to EMI's offices, EMI will notify customers promptly.

In residential buildings, a notice will be clearly posted on each floor of the building, as well as in the lobby, and will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

In commercial buildings, a similar notice will be prepared and distributed to the tenants in the affected building. Should a disruption occur at the head office of EMI, a detailed notice will be posted in the lobby of the building, as well as on the door of the office.

In addition, where EMI is aware that a person with a disability intended to use the service or facility during the period of disruption, EMI will contact the person directly to advise them of the disruption.

Staff training

EMI will provide AODA customer service training to all employees who deal with the public or other third parties on its behalf, and will ensure that all contractors who deal with the public or third parties on its behalf are provided with AODA customer service training. In addition, EMI will provide AODA customer service training to all those who are involved in the development and approvals of customer service policies, practices and procedures.

Training will include the following:

- An overview of the AODA and the requirements of the customer service standard
- EMI's plan for providing accessible customer service
- How to interact with persons with various types of disabilities
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty accessing your organization's goods or services.

Following the initial training, EMI will provide training updates to staff every two years or when there are changes to this policy. New staff will be trained as part of their initial orientation.

Customer feedback regarding the provision of goods and services to persons with disabilities

EMI aims to meet the expectations of its clients, including in regard to the manner in which it delivers services to persons with disabilities. EMI welcomes feedback on whether expectations are being met.

Customers who wish to provide feedback on the way EMI provides goods and services to people with disabilities are encouraged to provide feedback to Romeo Bongo by e-mail at rbongo@emeryinvestments.com. However, a person with a disability may also provide feedback in another manner that is most convenient for them, such as in person, by phone or otherwise. Mr. Bongo will provide a response to the feedback within 14 days in the format requested by the person providing feedback (or the most appropriate format where no request was made).

5. Integrated Accessibility Standards

Accessibility Plan

EMI's Accessibility Plan, outlining its strategy and timelines to identify and remove barriers from its workplace, to prevent barriers from arising in the workplace, and to improve opportunities for persons with disabilities, is included within this document.

The Accessibility Plan will be reviewed and updated at least once every five years. The plan will be made available on EMI's website and EMI will provide a copy of this policy, including the Accessibility Plan, in an accessible format upon request.

Training

In addition to the training commitments relating to the customer service standard, EMI will train all its employees on the requirements of the IASR, and on the requirements of the Ontario *Human Rights Code* pertaining to persons with disabilities, before January 1, 2015. Following January 1, 2015, this training will be delivered to new employees as soon as practicable and within the calendar year in which they are hired.

Should any substantive changes be made to this policy, all employees will be notified immediately of the changes and will be retrained within six months of the finalization of the revisions. EMI will keep a record of the training it provides, including the date of training and the employees in attendance.

Emergency Response Information

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

Where an employee requires assistance during an emergency, EMI will, with the consent of the employee, provide the workplace emergency response information to the person designated by EMI to provide assistance to the employee in the case of an emergency.

EMI will review the individualized workplace emergency response information when the employee moves to a different location within the organization or when the employee's overall accommodation plans are reviewed.

a. INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

EMI will utilize the feedback process noted above for any employee or public feedback relating to its compliance with the Integrated Accessibility Standards.

Accessible Formats and Communication Supports

EMI will ensure that all publicly available information is made accessible upon request by January 1, 2016. To meet this requirement, EMI will provide its publicly available information in accessible formats or with communication supports for persons with disabilities, within a reasonable amount of time upon request. Revised formats will take into account the person's accessibility needs due to the applicable disability. In addition, EMI will consult with the person making the request in determining the suitability of an accessible format or communication support.

Accessible Websites and Web Content

Should EMI launch a new public website or undergo a significant refresh of its existing website, the site and any of its web content published after January 1, 2012, the new web content and/or the new internet website will comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A. In addition, all web content published on or after January 1, 2012 will comply with WCAG 2.0, Level AA, by January 1, 2021, subject to limited exceptions prescribed by the IASR. EMI will ensure that the requirements of the AODA are included in the planning and design or refresh of all new web content in order to prevent new barriers to access any EMI website.

This policy does not apply to any web content published before January 1, 2012.

b. EMPLOYMENT STANDARDS

Recruitment, Assessment and Selection Process

Employees, applicants and the public will be made aware of accommodations that are available to them throughout the hiring process. Specifically:

- Job applicants will be advised that EMI will accommodate disability during the selection process.
- EMI will consult with applicants requesting accommodation to best meet their needs
- Successful applicants will be advised of EMI's policies for accommodating employees with disabilities.

In order to meet this requirement by January 1, 2016, EMI will review the manner in which jobs at EMI are advertised and ensure that any future job postings make reference to the requirements of the AODA and the

Duty to Accommodate. EMI will also review the manner in which successful applicants are contacted and will ensure that any verbal or written notification includes a standardized reference to EMI's accommodation policies. EMI will include a reference to available accommodations within its employee handbook and will also ensure that managers and supervisors receive training on this requirement.

Accessible Formats and Communication Supports for Employees

By no later than January 1, 2016, EMI will commit to utilize the necessary formats and supports when communicating with employees with disabilities. Specifically, when an employee with a disability makes a request, EMI will 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.

Performance Management, Career Development and Advancement & Redeployment

EMI 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. In order to meet this requirement by January 1, 2016, EMI will review its existing policies relating to performance management, career development and redeployment and ensure that these policies make reference to the duty to accommodate and the requirements of the AODA. EMI will also ensure that managers and supervisors involved in these processes receive training on this requirement.

Accommodation and Return to Work Plans

By January 1, 2016, EMI will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. This process will include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
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.
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.
5. The steps taken to protect the privacy of the employee's personal information.

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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.

By January 1, 2016, EMI will also develop and have in place a documented 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. The return to work process will:

1. 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
2. Use documented individual accommodation plans, described above, as part of the process.

c. DESIGN OF PUBLIC SPACES

By January 1, 2017, EMI will ensure that it meets the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, including, but not limited to, outdoor paths of travel and accessible off street parking. EMI will ensure that the requirements of the AODA are included in the planning and design of all public spaces in order to prevent new barriers to access of public spaces. EMI is committed to maintaining the accessible parts of its public spaces and will utilize the notification process outlined in the Accessible Customer Service Policy for any disruptions to the accessible parts of its public spaces.

d. COMPLIANCE

EMI will file an accessibility report with the Accessibility Directorate every three years, beginning on December 31, 2014.