



E.S. FOX LIMITED

INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) POLICY

1.0 STATEMENT OF COMMITMENT

E.S. Fox Limited (ESFL) is committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

2.0 PURPOSE

This policy is intended to meet the requirements of the AODA and is created in conjunction with P-HR-002 (AODA Customer Service).

3.0 SCOPE

This policy applies to all ESFL locations including employees, agents, and contractors who represent ESFL.

4.0 DEFINITIONS

None.

5.0 RESPONSIBILITIES

5.1 The Senior Vice President/Chief Operating Officer (Sr. VP/COO) and Vice Presidents are responsible for:

- a) Approval of this policy and ensuring it is properly administered within their area(s) of responsibility, and
- b) Ensuring that accessibility is considered when reviewing or creating Company policies, procedures or when making decisions on office purchases/renovations.

5.2 The Area and Department Managers are responsible for:

- a) Ensuring they are aware of and compliant with this policy and associated procedures,

- b) Ensuring their staff are appropriately trained on AODA standards, and
- c) Communicating accessibility matters with appropriate parties such as the Sr. VP/COO or Human Resources Manager.

5.3 The Human Resource Manager is responsible for:

- a) Overall administration of the AODA policies and procedures, and
- b) Accessibility reporting.

5.4 The Employees/Contractors representing ESFL are responsible for:

- a) Ensuring awareness and understanding of this policy and procedures, and
- b) Completing mandatory AODA training.

6.0 INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)

The IASR includes five (5) standards in the areas of:

1. Information and Communications
2. Employment
3. Transportation (applies only to provincially-managed transportation services)
4. Design of Public Spaces
5. Customer Service (Refer to P-HR-002 – AODA Customer Service)

6.1 Information and Communications

ESFL is committed to meeting the communication needs of people with disabilities. When asked, ESFL will provide information and communications material in accessible formats or with communication supports. This includes publicly available information about goods, services and facilities, as well as publicly available emergency and safety information.

ESFL will consult with people with disabilities to determine their information and communication needs.

ESFL will ensure existing feedback processes are accessible to people with disabilities upon request.

ESFL will make its website and content conform to WCAG 2.0, Level AA by January 1, 2021.

6.2 Employment

ESFL is committed to fair and accessible employment practices and will notify the public and staff that (when requested) the Company will accommodate disabilities during recruitment and assessment processes and when individuals are hired.

If needed, ESFL will create an individual accommodation plan and/or workplace emergency information for any employees who have a disability.

ESFL's performance management, career development, redeployment and return-to-work policies will take into account the accessibility needs of employees with disabilities.

6.3 Transportation

ESFL does not provide provincially-managed transportation services.

6.4 Design of Public Spaces

ESFL will meet the Accessibility Standards for the design of public spaces when building or making major modifications to public spaces.

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

6.5 Customer Service

The Customer Service policy (P-HR-002) applies to the provision of goods and services by all ESFL locations including employees, agents, and contractors acting on behalf of ESFL.

6.6 Training

ESFL is committed to training employees and volunteers on Ontario's accessibility laws and on accessibility aspects of the Ontario Human Rights Code that apply to persons with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers, and contractors.

6.7 Modifications to This or Other Policies

Any policy of ESFL that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.