

ACCESSIBILITY POLICY

This Accessibility Policy outlines the strategy of The PIC Group to achieve accessibility and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

STATEMENT OF COMMITMENT

The PIC Group is committed to treating all people in a way that allows them to maintain their dignity and independence. The PIC Group believes in integration and equal opportunity. 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 AODA.

The PIC Group is committed to providing our services, programs, goods and facilities to persons with disabilities in a manner that:

- Is free from discrimination
- Seeks to provide integrated services
- Is in an accessible format, and
- Takes into consideration a person’s disability

The PIC Group relies on all of its employees, volunteers and partners to assist with maximizing accessibility within the Company by:

- Identifying potential barriers and proposing ways to remove them
- Participating in training
- Learning how to interact with persons with disabilities, including those who require the use of a support person or service animal
- Learning how to use existing accessibility devices

ACCESSIBILITY COORDINATOR

The Company has appointed an Accessibility Coordinator who will provide primary oversight and guidance on the implementation of AODA accessibility standards, in conjunction with the human resources, legal, and information technology departments as well as other members of the management team, as well as prepare accessibility reports, facilitate access for persons with disabilities to the building or premises, and address all other matters to comply with the AODA.

As appropriate, the Accessibility Coordinator, in conjunction with legal, will also support and work with managers, supervisors and employees to ensure ongoing compliance, to remove barriers, and to improve accessibility. The Accessibility Coordinator will review the Company’s various accessibility policies, practices and procedures at least once every calendar year. The Vice President of Human Resources shall act in the role of the accessibility coordinator for The PIC Group.

ACCESSIBILITY POLICIES

The Company will develop, implement and maintain any other accessibility policies, plans or procedures and take all other measures as may be required by the AODA or any of the regulations or accessibility standards.

MULTI-YEAR ACCESSIBILITY PLAN

The PIC Group will maintain a Multi-Year Accessibility Plan (“Accessibility Plan”) which will be made available in an accessible format, upon request. The Accessibility Plan will be reviewed and updated regularly, but no less than once every five (5) years. In addition, the Company will maintain policies governing how we will meet our requirements under the AODA, including policies related to customer service, employment, information and communication. The Company will provide copies of these policies in an accessible format, upon request.

INFORMATION AND COMMUNICATION

The PIC Group is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs. Accessible formats and communication supports are available upon request. The Company’s commitment does not necessarily apply to products and product labels, unconvertible information or communications and information that our Company does not control directly or indirectly through a contractual relationship. If it

is determined that information or communications are unconvertible, the PIC Group will provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible as well as a summary of the unconvertible information or communications.

TRAINING

In accordance with the *AODA*, the Company will provide training to employees, volunteers and other staff on Ontario's accessibility laws and on the *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees, volunteers and other staff. This training will include instruction on the following:

- Purposes and requirements of the *AODA*, including the Customer Service Standard (Regulation 429/07) and the Integrated Accessibility Standards (Regulation 191/11)
- How to interact and communication with persons with various types of disabilities as well as those who use an assistive devices, or require the assistance of a service animal or support person
- How to use equipment or devices available from the Company that may help with the provision of goods or services to a person with a disability
- What to do if a person with a particular type of disabilities is having difficulty accessing our goods or services

Training will take place as soon as practicable and upon completion the Accessibility Coordinator will keep a record of the training provided, including the date on which the accessibility training took place and the number of people trained.

CONTRAVENTIONS

The Accessibility Coordinator, as well as managers and supervisors of The PIC Group, will monitor existing and new practices and procedures to ensure compliance. A failure by any employee to comply with this Accessibility Policy, the Multi-Year Accessibility Plan, the Customer Service Policy, or any other policy, practice or procedure related to accessibility issues, the removal of barriers, or the *Human Rights Code*, may result in corrective action taken against the offending employee, up to and including dismissal.

MORE INFORMATION

For more information on this or any other accessibility policy, or to receive a copy of any of the policies or other documents or records required by the *AODA*, please contact the Company's Accessibility Coordinator / Vice President of Human Resources at:

Name: _____

Position: _____

Address: _____

Email: _____

Phone / Fax: _____

This Accessibility Policy will be made publicly available. Accessible formats of this document are available for free, upon request.

MULTI-YEAR ACCESSIBILITY PLAN

PURPOSE

This Multi-Year Accessibility Plan ("Accessibility Plan") outlines the short and long-term strategies of The PIC Group to prevent and remove barriers, improve opportunities for people with disabilities, and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

STATEMENT OF COMMITMENT

The PIC Group is committed to treating all people in a way that allows them to maintain their dignity and independence. The PIC Group believes in integration and equal opportunity. 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 AODA.

The Company has appointed an Accessibility Coordinator with the mandate of ensuring compliance with the Company's obligations under the AODA. However, The PIC Group also relies on all of its employees, volunteers and partners to assist with maximizing accessibility within the Company by:

- Identifying potential barriers to accessibility and proposing ways to remove them
- Participating in training
- Learning how to interact with persons with disabilities, including those who require the use of a support person or service animal
- Learning how to use existing accessibility devices

STRATEGY FOR COMPLIANCE

The Accessibility Coordinator, including his or her designates, will regularly but no fewer than once per year:

- Review the AODA, regulations and accessibility standards with a view to ensuring ongoing compliance
- Review existing policies and strategies and evaluate their effectiveness at removing barriers to accessibility, making changes as needed
- Identify new barriers to accessibility and develop and implement removal strategies
- Review all individualized workplace emergency response information, making changes
- Evaluate physical accessibility to all premises owned or operated by the Company in Ontario in which the Company does business to ensure barrier-free accessibility
- Evaluate communication methods as well as the manner in which goods and services are provided to the public and other third parties to ensure barrier-free accessibility
- Arrange for and/or provide necessary training
- Prepare and file any required accessibility compliance report(s)
- Ensure all required documents required by the AODA, regulations and standards are posted in appropriate locations and otherwise made available in accessible formats

Within the first three (3) months of each calendar year, the Accessibility Coordinator, including his or her designates, will review the AODA, regulations and standards to identify upcoming compliance obligations and establish a schedule for achieving compliance within the requisite timelines.

SELF-SERVICE KIOSKS

The PIC Group will have regard to the accessibility needs of persons with disabilities if and when designing, procuring or acquiring self-service kiosks.

EMPLOYMENT

The Company is committed to fair and accessible employment practices which are inclusive of persons with disabilities.

Recruitment

The Company will review its recruitment and assessment practices to ensure compliance with the Employment Standard by no later than **January 1, 2016**. The Company will take the following steps to

notify the public and staff that, when requested, the Company will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- Information will be posted about the availability of accommodations for applicants with disabilities in the Company's recruitment process
- Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request
- An applicant requesting accommodation will be consulted about how to best provide accommodation in a manner that takes into account the applicant's disability
- Successful applicants will be notified about the Company's policies for accommodating employees with disabilities as part of their offer of employment

Individual Accommodation Plans and Return to Work Processes

By no later than **January 1, 2016**, The PIC Group will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Inform employees, as soon as practicable after they commence employment, of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability
- Provide updated information to all 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
- Implement a written process for developing and maintaining documented individual accommodation plans for employees with disabilities, including: (1) information regarding accessible formats and communications supports, and (2) individualized workplace emergency response information
- Implement a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations, which will outline the steps the Company will take to facilitate the employee's return to work

Performance Management, Career Development and Redeployment Processes

By no later than **January 1, 2016**, The PIC Group will take into account the accessibility needs of its employees with known disabilities as well as any individual accommodation plans when applying performance management, career development and redeployment processes.

Upon request, The PIC Group will consult with an employee with a disability to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job as well as information that is generally available to employees in the workplace.

WEBSITE / COMMUNICATIONS

The Company will consult with its information technology and website support partners to ensure that:

- All new websites and content on those sites conform with WCAG 2.0, Level A by no later than **January 1, 2014**
- All websites and content conform with WCAG 2.0, Level AA by no later than **January 1, 2021**

The Accessibility Coordinator, including his or her designates, will also consult with the Company's human resources, legal, information technology and website support partners to ensure that:

- Existing feedback processes are accessible to persons with disabilities upon request by **January 1, 2015**

All publicly available information is made accessible upon request by **January 1, 2016**.

TRAINING

In accordance with the *AODA*, regulations and standards, the Company will provide training to our employees, volunteers and other staff on Ontario's accessibility laws and on the *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees, volunteers and other staff and will include instruction on:

- Purposes and requirements of the *AODA*, including the Customer Service Standard (Regulation 429/07) and the Integrated Accessibility Standards (Regulation 191/11)
- How to interact and communication with persons with various types of disabilities as well as those who use an assistive devices, or require the assistance of a service animal or support person
- How to use equipment or devices available from the Company that may help with the provision of goods or services to a person with a disability
- What to do if a person with a particular type of disabilities is having difficulty accessing our goods or services

The Company will take the following steps to ensure, by **January 1, 2015**, that it has a training program in place to ensure employees, volunteers and other staff are provided with the training needed to meet Ontario's accessible laws:

- Develop training materials on the Integrated Accessibility Standards and the *Human Rights Code*
- Develop a process to maintain records of who has received training and the dates on which accessibility training took place
- Develop a process whereby new employees will receive training as soon as practicable at the start of their employment
- Provide the established training to all employees, volunteers and other staff

Notwithstanding the timelines set out above, training will take place as soon as practicable for all current affected employees, volunteers and other staff of the Company.

DESIGN OF PUBLIC SPACES

The PIC Group will ensure that all public spaces owned or operated by the Company that are newly constructed or redeveloped beginning **January 1, 2017**, comply with the Built Environment standards as set out in the Integrated Accessibility Standard, including standards relating to (but not necessarily limited to) the following elements:

- Exterior paths of travel (outdoor sidewalks, walkways, ramps, stairs and curbs)
- Parking (number and type of accessible spaces, aisles and signage)
- Services (service counters, queuing guides and waiting areas)

The PIC Group will also develop procedures for preventative and emergency maintenance of the accessible elements in public spaces, as well as dealing with temporary disruptions when accessible elements in public spaces are not in working order.

AVAILABILITY OF ACCESSIBILITY PLAN

This Accessibility Plan will be included in the Employee Handbook and will be provided in an accessible format, upon request. This Accessibility Plan will be reviewed and updated regularly, but no less than once every five (5) years.

FEEDBACK PROCESSES

By **January 1, 2015**, the PIC Group will review its internal and external feedback processes (if any) to ensure they are accessible to people with disabilities upon request. The Company will also ensure that by **January 1, 2016**, all publicly available information is made accessible in a timely manner, if requested.

MORE INFORMATION

For more information on this or any other accessibility policy, or to receive a copy of any of the policies or other documents or records required by the AODA, please contact the Company's Accessibility Coordinator / Vice President of Human Resources at:

Name: _____

Position: _____

Address: _____

Email: _____

Phone / Fax: _____

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