

Accessibility for Ontarians with Disabilities Act (AODA) Policy

PURPOSE

Petrela, Winter & Associates (a Navacord Company) believes in inclusion and equal opportunity for all and is committed to developing and implementing strategies to comply with the accessibility legislation. As an organization we are looking to strengthen the underlying principles of dignity, independence, integration, and equal opportunity.

OUR COMMITMENT

Navacord is committed to treating everyone with fairness and respect, in an impartial, equitable, sensitive, and ethical manner. Navacord is working towards full compliance with current standards of the Integrated Accessibility Standards Regulation (IASR) Policy, Regulation 191/11, under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA); and Accessible Canada Act as they are introduced. In doing so, we affirm our commitment to providing quality services in a manner that respects the dignity and independence of persons with disabilities.

Navacord is committed to developing, implement, and maintain policies that govern how the organization achieves or will achieve accessibility. To facilitate this commitment, Navacord has established, maintained, and documented a multi-year accessibility plan, that is reviewed and updated at least once every five years to identify progress made in addressing barriers and will be posted on Navacord's website and Employee Intranet.

SCOPE

This policy applies to all staff personnel (employees, volunteers, contractors, and other third parties).

Location of offices that are covered by this policy:

- 36 York Mills Road, Suite 501, Toronto, ON M2P 3E9
- 1545 Carling Avenue, Suite 412, Ottawa, ON K1Z 8P9
- 1033 Barrydowne Road, Suite 203, Sudbury, ON P3A 5Z9
- 700 Richmond Street, Suite 301, London, ON N6A 5C7

PROVIDING SERVICES TO PERSONS WITH DISABILITIES

Navacord is committed to excellence in serving any person who may require services, including persons with disabilities, through the following areas:

General Requirements:

Accessibility Policies:

The AODA requires Navacord to maintain one or more policies governing how the organization will achieve the requirements of the IASR. Navacord must also make such documents available to the public, and in accessible formats upon request. This Policy is adopted in compliance with this obligation.

Multi-Year Accessibility Plan:

The AODA requires Navacord to establish, implement, maintain, and make public a Multi-Year Accessibility Plan outlining the organization's strategy to identify, remove and prevent barriers and to meet the legislated requirements of the IASR. It must be posted on the company's website and made available in an accessible format or with appropriate communications supports as soon as possible upon request. Accompanying this policy is Navacord's Multi-Year Accessibility Plan (2023-2028).

Procurement of Goods and Services:

When procuring goods, services, or facilities, Navacord incorporates accessibility criteria and features into its selection process. In instances where this is not feasible, the organization will provide an explanation, upon request.

In addition, Navacord requires that for any contractors or service providers whose staff may interact with employees, clients, or the public on behalf of the organization, it is necessary that those individuals have received training in the Customer Service Standard prior to commencing their duties at, or on behalf of, the organization. It is the responsibility of the contractor or service provider to provide this training to their employees.

Training:

All Navacord employees are required to take the following training:

- The purpose of the AODA and related Navacord policies
- Accessible Customer Service Standard
- How the Ontario Human Rights Code works with AODA.
- Any accessibility requirements that apply to their job duties and your organization

Information and Communication Requirements:**Accessible Formats and Communication Supports:**

The AODA requires that all information and communications that Navacord produces, directly or indirectly through contractual relationships, must be made available in accessible formats upon request.

When an accessible format or communication support is requested, Navacord will consult with the person making the request to determine which format or support is required and provide or make arrangements to provide the material in a reasonable amount of time and at no additional cost to the requestor.

If, in consultation with Human Resources, the information or communication is determined to be unconvertible, Navacord must provide the person requesting the information or communication with:

- an explanation as to why the information or communications are unconvertible, and
- a summary of the unconvertible information or communications.

Notice of Availability of Documents:

This Policy will be maintained by Human Resources and available on the company's website and SharePoint. The Policy will be provided to individuals, upon request, in the appropriate format or with communication support.

Accessible Websites and Web Content:

Navacord's internet website and web content, conforms to World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, in accordance with the timelines set out in the IASR and in the Accessible Information, Communications, and Technology Guidelines.

Our Marketing department, in consultation with Human Resources, is responsible for establishing and maintaining procedures, standards and guidelines to ensure all internet websites and web content is accessible.

Emergency Procedures, Plans or Public Safety Information:

Navacord's emergency procedures, plans and public safety information is available to our employees and public and it will be made available in an accessible format or with appropriate communication supports as soon as possible upon request.

Feedback:

Navacord endeavors to meet customer expectations when serving persons with disabilities. Comments on our services are welcomed and appreciated from members of the public and employees. Feedback regarding the way that Navacord provides services to persons with disabilities can be made in the following ways:

- in person
- by telephone at 416-488-2522
- in writing to 36 York Mills Road, Suite 501, Toronto, ON attention Human Resources.
- by email to askHR@jdimi.com

If clients and employees with disabilities would prefer to give their feedback, and receive a response to it, using an alternate method than the one offered; they may request it. All reviewed feedback will be addressed according to established service management procedures.

Customer Service Requirements:**Assistive Devices:**

Navacord is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We ensure that our employee is trained and familiar with various assistive devices that may be used by people with disabilities while accessing our goods, services, or opportunities.

Most assistive devices such as mobility aid and mobility assistive devices are "personal assistive devices," such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space.

Billing:

We are committed to providing accessible invoices to all of our clients. Invoices will be provided in alternative accessible format upon request. We will answer any questions clients may have about the content of the invoice in person, by telephone or email.

Service Animals:

People with disabilities may use their service animal in all parts of our premises that are open to the public, unless the animal is excluded by law, such as in food preparation areas. In this case, we will ensure that appropriate alternative arrangements are made to ensure that the person can access the Service. Regulatory changes to Ontario Regulation 191/11. As a result, if a Navacord manager or human resources professional cannot easily identify that the animal is a service animal, the manager or human resources professional can ask the person using the service animal to provide documentation. The documentation must be from a regulated health professional to confirm that the service animal is required for reasons relating to the person's disability. Definitions for service animals and how service animals can be easily identified can be found in the definitions section at the end of this document.

Support Persons:

Navacord is committed to welcoming persons with disabilities who are accompanied by a support person in parts of our premises that are open to the public. People with disabilities can access their disability-related support person while using our services. In situations where confidential matters will be discussed, the support person may be asked to sign a confidentiality agreement, or the role of the support person may need to be agreed to in advance of the meeting. In certain cases, Navacord might require a person with a disability to be accompanied by a support person for health or safety

reasons. As a result of regulatory changes to Ontario Regulation 191/11 which took effect on July 1, 2016, before making a decision, Navacord will do the following:

- Consult with the person with a disability to understand their needs.
- Consider health or safety reasons based on available evidence.
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

In such a situation, Navacord will waive the admission fee or fare for the support person, if one exists.

Notice of Service Disruption:

If there is a problem with facilities or services that people with disabilities rely on, Navacord will provide notice to the public. The way that Navacord will provide the notice will be determined by the nature of the problem. Navacord will always try to make alternative arrangements to provide service where possible. A Notice of Temporary Disruption form is one of the available methods for Navacord to print and display at the affected premise where appropriate. Other modes of notification could be in-person or via the website.

Telephone Services:

We train our employees to communicate over the telephone in clear and plain language and to speak clearly and slowly.

Employment Standards Requirements:**Accessible Formats and Communication Supports for Employees:**

In accordance with the Ontario Human Rights Code, upon an employee's request, Navacord 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 the employee's job.
- information that is generally available to employees in the workplace.

Navacord will consult with the employee making the request in determining the suitability of an accessible format or communications support.

Employment:

We are committed to welcoming people with disabilities with respect to recruitment, employment, training, career development and career progression.

Employee Support:

Navacord's employees are made aware of policies used to support employees with disabilities and accommodations available in accordance with the Ontario Human Rights Code. Navacord provides this information to new employees through orientation materials and will 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.

Individual Accommodation Plans:

Navacord's Accommodation Policy describes the mandatory process for the development and maintenance of documented individual accommodation plans to support employees with disabilities. The process set out in the policy meets requirements of the AODA. If applicable, individual accommodation plans may include information regarding plans for accessible formats and communication supports, as well as individualized workplace emergency response information.

Performance Management, Career Development, and Redeployment:

Navacord will ensure employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management and redeployment opportunities.

Recruitment, Assessment and Selection Process:

Navacord posts information about the availability of accommodations for internal and external job applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing must be notified that accommodations are available on request. Navacord will consult with applicants who request an accommodation and, in accordance with the Ontario Human Rights Code will provide or arrange for the provision of a suitable accommodation in a timely manner that takes into account the applicant's accessibility needs due to disability. Successful applicants will be notified about Navacord's policies for accommodating employees with disabilities as part of their offer of employment.

Return to Work Process:

Navacord has in place a documented return to work process for employees returning to work following an illness or injury where disability-related accommodations are required.

Workplace Emergency Response Information:

Navacord will provide individualized emergency response information to employees who identify potential accessibility barriers when responding to emergency situations. Information on individualized workplace emergency response will be provided to the employee as soon as practicable after becoming aware of the need for accommodation due to the employee's disability. If the employee requires assistance, Navacord must receive consent from the employee to provide the individualized emergency response information to the person(s) designated to provide assistance. The information will be reviewed when the employee moves to a different location, when the employee's accommodation needs change, when overall accommodation plans are reviewed and when Navacord reviews its general emergency response plan.

Transportation Standard Requirements:**Transportation:**

While Navacord is not primarily in the business of transportation, we do periodically provide or arrange for transportation services for certain organization related functions. In these instances, accessible transportation or equivalent services is provided (upon request) for persons with disabilities and is provided at no additional cost. Individuals must contact the coordinator of their particular event to request this accommodation.

Please be advised that most services, events, and normal operations that the organization undertakes does not include providing transportation services to any individuals. In these circumstances, persons with disabilities are responsible for their own accessibility needs when they are to provide their own transportation.

Built Environment and Public Spaces Requirements:**Accessibility Requirements in Codes and Standards:**

The *Ontario Building Code*, which has a section on Barrier-Free Design, and the AODA, IASR Design of Public Spaces Standards are both standards to which Navacord adheres to. These standards establish the minimum threshold for accessibility in the built environment.

Modifications to this or other policies

Navacord is committed to developing and enhancing AODA and customer service plans and policies that respect, and promote the dignity and independence of persons with disabilities.

Questions Regarding Navacord's AODA Policy

Any questions or inquiries may be directed to Human Resources.

DEFINITIONS

Accessibility: A concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political, and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.

Accessible: Refers to products, devices, information, services, facilities, or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both “direct access” (i.e., unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.

Assistive Device: means an assistive device is a piece of equipment a person with a disability uses to help with daily living. Most assistive devices are “personal assistive devices,” such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space.

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.

Accessibility Standard: means an accessibility standard made by regulation under section 6.

Barrier: means 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, information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice

Communications: means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

Communication Supports: may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, and sign language and other.

Conversion Ready: An electronic or digital format that facilitates conversion into an accessible format such as Braille, large print, audio cassettes CDs DVDs, etc.

Dignity: Policies, procedures and practices that respect the dignity of a person with a disability are those that treat them as customers and clients who are as valued and as deserving of effective and full service as any other customer. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services and show respect for these methods.

Disability means:

(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; ("handicap")

Equal Opportunity: Equal opportunity means having the same chances, options, benefits, and results as others. In the case of services, it means that people with disabilities have the same opportunity to benefit from the way you provide goods or services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or more inconvenience.

Guide Dog: means a guide dog as defined in section 1 of the Blind Persons' Rights Act.

Independence: In some instances, independence means freedom from control or influence of others, freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor. A staff person should not hurry them or take over a task for them if they prefer to do it themselves in their own way.

Information: includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Integration: Integrated services are those that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, practices, and procedures are designed to be accessible to everyone including people with disabilities. Sometimes integration does not serve the needs of all people with disabilities. Alternative measures, rather than integration, might be necessary because the person with a disability requires it or because you cannot provide another option at the time. If you are unable to remove a barrier to accessibility, you need to consider what else can be done to provide services to people with disabilities.

Mobility Aid: means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device: means a cane, walker, or similar aid.

Performance Management: Defined by the AODA as a program that defines and assesses employee performance, productivity, and effectiveness, with the goal of facilitating employee success.

Support Person: An individual who accompanies a person with a disability to help with communication, mobility, personal care, or medical needs or with access to goods or services.

Accommodation Policy

PURPOSE

Navacord is committed to providing inclusive, barrier-free employment, facilities, and services that are free from discrimination as required under the Ontario Human Rights Code (Code) and the Accessibility for Ontarians with Disabilities Act (AODA).

The goal of Navacord's Accommodation Policy is to foster an inclusive workplace. Navacord will fulfil its duty to accommodate by promoting inclusive employment practices, facilities, and service, and by exploring accommodation for persons and/or groups who request it based on the prohibited grounds in the Code.

SCOPE

This policy applies to all staff personnel (employees, volunteers, contractors, and other third parties).

PRINCIPLES

Navacord recognizes its duty to accommodate to the point of undue hardship and commits itself to an accommodation process that respects the Code principles of dignity and privacy, inclusion, and individualization.

Navacord's commitment extends to all aspects of employment, use of facilities and services. Employment activities include recruitment, assessment and selection, orientation, working conditions, promotion, training, performance management, career development, workforce transition, leaves of absence, return to work and redeployment. It also includes the purchase and management of information technology and communication systems, development and management of information services, decisions relating to real estate/property and purchases of internal fittings (e.g., chairs, desks, lights, etc.), and to the organization of conferences, seminars, and training. Accommodation of service recipients relates to all aspects of service delivery, including the provision of accessible and inclusive buildings, information, communications, systems, policy/program design and modifications, etc.

SYSTEMIC ASSESSMENTS

Proactive review of existing policies, rules, practices, and procedures to identify and eliminate barriers to access and inclusion. Ensuring policies, standards and practices are barrier-free can minimize the need for individual assessments/accommodation.

INDIVIDUAL ASSESSMENT

Accommodation is assessed and delivered on an individual basis for individuals who make their needs known. Each request must be considered individually to assess appropriate accommodation. Requests for accommodation must be dealt with in a timely manner so individuals can fully participate in all aspects of employment, use of facilities, and service provision, except where evidence does not support the need for accommodation or where undue hardship can be demonstrated.

ACCOMMODATION PROCEDURES

1. Informing management and human resources if employee requires accommodation

Employees who require accommodation due to a disability, medical condition, or any other protected ground in the Code are encouraged to inform their manager and human resources.

2. Assessing and verifying the need for accommodation

Those requesting accommodation should focus on the functional limitations that are impacting their ability to apply for work, perform their job, or access facilities. Employees are required to provide Navacord with a completed Medical Questionnaire by their physician. Employees should be prepared to answer questions about their functional limitations and/or provide (additional) documentary evidence.

Management and Human Resources will determine whether appropriate functional limitations have been identified in consultation where applicable with a third party, as necessary. If the functional limitations are not clear and/or there is no supporting documentation, or if the manager has a concern with the content/source of the documentation, they will need to verify the functional limitations by gathering more information from the employee.

Requests for accommodation are required to include sufficient information, including objective documentation, to confirm the need for accommodation and the type(s) of accommodation required. Supporting documentation must be verifiable. Examples of verifiable documentation include: a letter from a treating physician identifying functional limitations or a court sanctioned custody agreement setting out child-care responsibilities. All supporting documentation will be considered strictly confidential. To understand employees' accommodation request, we need to understand what the restrictions and limitations are, which will allow us to ensure that employees are accommodated appropriately. We do not require the employee's diagnosis to be disclosed. We only wish to acquire relevant information to determine the restrictions and abilities, in order to properly accommodate.

In some cases, Management may determine that there is insufficient documentation, or that the evidence does not support the need for accommodation. There may be no requirement for accommodation if:

- the request is not linked to a protected/prohibited ground in the policy.
- the requester refuses to provide supporting documentation.
- the denial of the request does not impose burdens, obligations, or disadvantages on the requester.
- the functional limitations do not trigger the need for accommodation when reviewed against the essential duties of the job or service being provided.
- evidence is received that contradicts the information provided by the employee (particularly if it is received from a subject-matter expert)

3. Dialogue

Once the functional limitations are verified, the parties will explore the request further. They are expected to:

- discuss the employment or service-related tasks/essential requirements that are impacted.
- identify possible accommodation solutions and assess the effectiveness each would have.
- identify any costs, benefits or detriments flowing from the alternatives.
- discuss timeframes for review and implementation (accommodation plans must be reviewed at least annually).

4. Identifying and Implementing the Accommodation Solution

In some cases, it may be necessary to provide interim accommodation while waiting for an accommodation to be put in place or while assessing and exploring a request for accommodation, (e.g., a manager may exempt an employee from some essential duties, arrange to have those duties performed by someone else on a temporary basis, allow the employee to work remotely).

If there is evidence that accommodation is required and Management determines that the accommodation can be made, it will then need to determine which accommodation option is most feasible. Factors to consider include:

- how well the option respects the dignity of the employee.
- the company's ability to reasonably accommodate it without causing undue hardship.
- whether options are compatible with other systems or the operations of the department.
- how difficult the option is to learn or if the requester has successfully used similar accommodations.

Efforts will be made to ensure that the employee is not disadvantaged by the accommodation measure chosen. Management should choose the option with the least disruption to the employee. However, the circumstances may be such that accommodation cannot be provided without disruption to the employee. In those instances, the employee has an obligation to accept a reasonable accommodation offer.

Once the accommodation option has been selected the employee will be informed in writing. The chosen accommodation should be implemented as quickly as possible. In most cases it will be necessary to monitor the success of the specific accommodation. It is necessary to review, modify or upgrade accommodations as jobs; services; functional limitations and accommodation options change over time. Accommodation may also need to be reviewed periodically to assess the impact on the operations of the department.

5. Assessing Undue Hardship and/or Denying the Request

The duty to accommodate does not create an endless obligation on Navacord. Circumstances of the individual, the co-operation of the employee, the success of accommodation attempts, and (limited to the employment context) the ability to perform the essential duties of the job and performance difficulties will all be relevant to determining where the duty to accommodate ends. While Navacord is committed to providing reasonable accommodation, there may be instances where, after careful assessment, it can be demonstrated that providing certain accommodations would result in undue hardship for the organization.

If a request for accommodation is denied and the individual believes the request has not been handled in accordance with the Accommodation Policy, several options are available for the individual:

- Discuss the issue with the President and/or HR Executive
- Submit a complaint to the Human Rights Tribunal of Ontario

DIGNITY AND PRIVACY

Individuals must be accommodated in ways that respect their dignity and right to privacy. Information relating to specific requests for accommodation will be treated as confidential and will only be used for the purpose of assessing and implementing accommodation options and solutions. Navacord will comply with all privacy, confidentiality, and security requirements of the Protection of Privacy Act.

If you have questions about these procedures or requirements, then please contact your manager or a member of the Human Resources team.