



AODA – Integrated Accessibility Standards Regulation

Policy Statement

The Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) was created with the goal of developing standards that would improve accessibility for people with disabilities across Ontario. MacMillan (the “Company”) understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

This policy gives guidance to the delivery of the Company’s services to people with disabilities, in compliance with requirements under the Integrated Accessibility Standards, O.Reg.191/11, established under the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11. All information and communications materials and services and employment services provided by the Company shall follow the principles of dignity, independence, integration and equal opportunity.

The policy applies to all Company employees, consultants and third-party contractors who deal with the public on behalf of the Company, and those who are involved in the Company’s policy and program development.

General Requirements

Establishment of Accessibility Plans and Policies

The Company maintains policies on how it shall meet AODA requirements and will provide policies in an accessible format upon request.

General Training Requirements

The Company’s employees, consultants, all those who participate in developing the Company’s policies and those who provide services on the Company’s behalf shall be required to undergo training on the requirements of the AODA accessibility standards and on the Ontario Human Rights Code as it relates to people with disabilities.



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Customer Service Standard

As part of this commitment, the Company has established various policies, practices and procedures for how services are provided to people with disabilities. These include the following areas:

Communication

All communication on behalf of the Company with a person with a disability will consider their disability and their preferred method of communication.

Assistive Devices

We are committed to serving people with disabilities who use, or who may benefit from the use of assistive devices to access Company services. Persons with disabilities may use their own assistive devices as required when accessing our services. In order to support a person with a disability to access our services, our staff may provide assistance upon request from the client.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access to services. For example, if a meeting is scheduled in a place where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Service Animals

A customer with a disability that is accompanied by a service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to service animals. If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, the Company may request verification from the customer in the form of a letter from a physician or nurse confirming that the service animal is required for reasons relating to the disability.

For the safety of our employees and other visitors, it is the responsibility of the person with the service animal to maintain care and control of the animal at all times.

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If a health and safety concern presents, for example in the form of a severe allergy to the animal, the Company will make all reasonable efforts to meet the needs of all individuals.

The Use of Support Persons

We welcome people with disabilities who are accompanied by support persons. The Company recognizes that some people with disabilities may have support people – e.g., paid professionals, volunteers, family members or friends – to help them with communication, mobility, personal care or medical needs, or with accessing our services. If a client with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the client is not prevented from having access to the support person.

Due to the confidential nature of some information that may be discussed, consent will be obtained from the client with respect to whether the support person remains in the meeting or is asked to wait in a reception area. If the support person will be remaining in the meeting, the person with the disability may be asked to provide written acknowledgement waiving confidentiality with respect to the support person prior to any conversation containing the confidential information.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions to facilities or services, whether planned or unplanned, the Company will promptly notify clients.

In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will be posted to our website, clients with appointments will be contacted, our office voicemail system will be updated, and a notification will be sent to all employees. This notification will include the services that are disrupted, the reason for the disruption, its anticipated duration, and any alternative facilities or services available.

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Staff Training

Training will be provided to new employees, volunteers, agents and/or contractors during orientation. Revised training will be provided in the event of changes to legislation, procedures, policies, and/or practices.

Training will be provided to:

- Every person who is an employee or volunteer with the Company;
- Every person who participates in developing the Company's policies; and
- Every other person who provides goods, services, or facilities on behalf of the Company.

Regardless of the format, training will include the following:

- An overview of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of its Client 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 support person;
- What assistive equipment or devices the Company has available or other methods that may help our employees provide our services to people with disabilities; and
- What to do if a person with a disability is having difficulty accessing our services.

Feedback Process

Providing accessible client service is important to us and we will always endeavour to do our best. We welcome feedback about how we are doing from persons with a disability as your comments are important for us to be able to learn and make improvements.

Feedback may be given verbally by telephone, through our client "Contact Us" webpage or electronically by email. Clients who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

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Information and Communication Standards

The Company will ensure that any process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports. In accordance with the Integrated Accessibility Standards, this standard addresses the following:

- Feedback
- Accessible Formats and Communication Supports
- Emergency procedure, plans and safety information

Feedback

The Company will ensure that any process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, on request.

Accessible Formats and Communication Supports

Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs to determine the suitability of an accessible format or communication support. Accessible formats include large print, recorded audio and electronic formats. Communication supports include reading written information, exchanging handwritten notes, and audio description.

The Company shall provide emergency procedures, plans and safety information in an accessible format with appropriate communication supports as soon as practicable, upon request.

Emergency Procedures, Plans and Safety Information

To enable people with disabilities to be prepared in case there is an emergency, workplace emergency response information shall be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.



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Employment Standards

The Company is committed to providing accessible employment that welcomes and celebrates diversity and strives to eliminate barriers.

The Employment Standards regulation expands Ontario's labour pool by ensuring people with disabilities are welcome and supported within all workplaces. The Company is committed to applying the Employment Standard in the manner by which it recruits, provides accessible information, plans for emergencies, performance management, and career development.

Recruitment, Assessment and Selection

The Company shall post information about the availability of accommodation for applicants with disabilities in its recruitment process. Job applicants who are selected for an assessment/interview shall be notified that accommodations are available for materials/processes used in selection, upon request. Successful applicants shall be notified about MacMillan's policies for accommodating employees with disabilities.

Employee Supports

The Company shall inform employees of 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 a disability. The Company shall provide this information to new employees as soon as practicable after they begin their employment and provide updated information to employees whenever there is a change to existing policies on the provision of job accommodations.

Accessible Formats and Communication Supports for Employees

Upon the request from an employee with a disability, the Company shall consult with the employee to provide/arrange for the provision of accessible formats and communication supports for:

1. information needed to perform the employee's job; and,
2. for information that is generally available to employees in the workplace

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The Company will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Workplace Emergency Response Information

If an employee's disability is such that an individualized workplace emergency response information is necessary, and the Company is aware of the need for accommodation, this information shall be provided to the employee. In addition, this information shall be provided, with the person's consent, to the person designated to provide assistance. The information shall be reviewed when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed, and when the Company reviews its general emergency response plan.

Performance Management and Career Development and Redeployment

The Company shall take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

Feedback Process

The Company encourages and welcomes feedback on how it provides services to persons with disabilities. Feedback can be provided using one of the following methods: Email, phone, mail, or in person. To provide feedback please contact:

- Evan Duque, Human Resources
- Telephone: 647-449-6103
- Email: Evan.Duque@macmillanscg.com

Upon receipt of feedback regarding the provision of services to persons with disabilities, the Company will review the feedback, take appropriate action, and make every effort to respond to the feedback quickly and effectively.

This policy and its related procedures will be reviewed as required in the event of legislative changes.

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