



Accessibility for Ontarians with Disabilities (AODA) Policy

Approved by: Jonathan Hou

Purpose:

The purpose of this policy is to ensure that Pleora Technologies Inc. (Pleora) complies with the Government of Ontario's Accessibility for Ontarians with Disabilities Act, 2005 (AODA) specifically the Customer Service Standard and the Integrated Standards (IASR) including Information and Communications and Employment.

Application and Scope:

This policy governs how Pleora will achieve meeting accessibility needs of persons with disabilities in the provision of goods and services to clients and external third parties, in the provision of customer services, information and communications and in its hiring and employment practices.

The policy applies to all Ontario employees, consultants and representatives of Pleora.

Statement of Commitment:

Pleora is committed to providing a welcoming, accessible, and inclusive environment that is respectful of the dignity and independence of all people. Our policies will support identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with Pleora. Additionally we will strive to ensure that AODA, its regulations, and integrated standards are observed in a timely fashion.

Confidentiality of Information:

Personal information concerning an individual's disability cannot and will not be released without written consent of the individual and will be managed in a manner that is consistent with Freedom of Information Guidelines and Personal Information Protection Guidelines, where appropriate. Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party, will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required. Definitions applicable to this policy are attached as Appendix 'A'.

1. Customer Service Standard

Under AODA, Ontario Regulation 429/07 entitled 'Accessibility Standards for Customer Service' came into effect on January 1, 2008. This regulation establishes standards specific to customer service for private sector organizations that provide goods or services to members of the public or third parties. Pleora will use reasonable efforts to ensure the provision of its services are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Providing services in a manner that respects the dignity and independence of persons with disabilities;
- Providing services so that persons with disabilities are able to fully benefit from the same services, in the same place, and in the same or similar way as persons without disabilities, unless an alternative measure is necessary to enable a person with a disability to obtain, use, or benefit from Pleora Technologies services; and
- Giving people with disabilities the same opportunity equal to that of persons without disabilities to obtain, use or benefit from Pleora Technologies services.

Use of Assistive Devices

Pleora will strive to accommodate persons with disabilities who use personal assistive devices while on Pleora premises to ensure equal access to our goods and services.

Communication

When communicating with a person with a disability, Pleora will do so in a manner that takes into account the person's disability.

Use of Service Animals and Support Persons

Persons with disabilities who are accompanied by guide dogs or other services animals will be permitted to enter Pleora's premises and attend Pleora events with the animal and will be allowed to keep the animal with them, unless the animal is otherwise excluded by law. If the service animal is excluded by law, Pleora will use reasonable efforts to ensure that alternate means are available for persons with disabilities to obtain, use or benefit from Pleora's services.

If it is not readily apparent that the animal is a service animal, Pleora may ask the person with a disability to provide documentation from a regulated health professional confirming that the person requires the animal for reasons relating to his or her disability.

It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

Persons with disabilities who are accompanied by a support person will be permitted to enter Pleora's premises that are open to the public and will not be prevented from having access to the support person while on the premises.

Pleora may require a person with a disability to be accompanied by a support person while on Pleora's premises in situations where it is deemed necessary to protect the health and safety of the person with a disability and/or others. Before making a decision, Pleora will: consult with the person with a disability to understand his/her 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.

Notice of Temporary Disruptions

Pleora will make reasonable efforts to provide notice to persons with disabilities in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. If the disruption is anticipated, Pleora will provide a reasonable amount of advance notice of the disruption. If the disruption is unexpected, notice will be provided as soon as possible.

The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Feedback Process

Pleora is committed to being responsive to the diverse needs of people with disabilities. We welcome and appreciate feedback from the public regarding the accessibility of our goods and services. Feedback from members of the public regarding the provision of Pleora's goods and services to people with disabilities can be made by telephone, in person, in writing, in electronic format (e.g. e-mail) or through other relevant methods.

Feedback should be directed to Human Resources who can be reached at:

340 Terry Fox Drive, Kanata, Ontario K2K 3A2
613-270-0625
hr@pleora.com

Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve Pleora's services. In most cases, an acknowledgement will be provided within 48 hours, and a formal response to the feedback will be provided within 30 working days. Feedback and/or responses will be delivered in a format that is accessible to the complainant.

Integrated Accessibility Standards Regulation (IASR)

Under AODA, Ontario Regulation 191/11, entitled 'Integrated Accessibility Standards Regulation' (IASR) provides standards for private organizations to increase accessibility for persons with disabilities. The two regulations which apply to Pleora are: Information and Communications and Employment.

2. Information and Communications Standard

Pleora will achieve compliance with this standard in the provision of information and communication by January 1, 2016. Information that Pleora does not control directly or indirectly through a contractual relationship is not applicable.

Pleora will provide or arrange for **accessible formats and communication supports** where appropriate for persons with disabilities in a timely manner that takes into account each person's accessibility needs. We will consult with the person making the request to determine the suitability of an accessible format or communication support and communications supports will be provided at a cost that is no more than the regular cost charged to other persons.

Pleora will ensure that all new Pleora **websites and web content accessibility** conforms to WCAG 2.0 Level A Standards. By January 1, 2021 Pleora Technologies will ensure that all new and existing Pleora **websites and web content** accessibility will conform to WCAG 2.0 Level AA Standards.

3. Employment Standard

Pleora strives to build an inclusive and accessible work environment free from discrimination and harassment for both employees and job applicants and will be compliant with this standard by January 1, 2016.

Recruitment-Job Applicants

Pleora will notify employees and the public about the availability of accommodations for job applicants with disabilities. Applicants will be made aware of the availability of accommodation when identified for an interview. If accommodation is required, Pleora will consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability. Additionally, successful applicants will be made aware of Pleora's policies for accommodating employees with disabilities during the offer of employment process.

Employees

All employees will be made aware of our policy and process to support employees with disabilities, including the provision of job accommodations that takes into account an employee's accessibility needs due to disability. New employees to Pleora will be provided this information as part of their new hire orientation session. Information updates will be provided to all employees whenever there is a change to the existing policy or process

Pleora will respond to all employee requests for the provision of **accessible formats and communication supports** for information that is needed in order to perform the employee's job or is information that is generally available

to employees in the workplace. Pleora will consult with the employee making the request in determining the suitability of an accessible format or communication support.

If an employee discloses that he/she has a disability and may need help in an emergency situation, Pleora will consult with employees to prepare an individualized **workplace emergency response plan**. The emergency response plan will be shared with others who are part of the emergency response plan only with consent of the affected employee.

Pleora will develop and document an **individual accommodation plan** for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communication supports.

Pleora will develop and document a **return to work process** for employees returning to work due to disability and requiring disability-related accommodations. Pleora will work with the employee to ensure the employee's reintegration is successful.

Pleora will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing **career development, performance management and when considering redeployment**.

Multi-Year Accessibility Plan

Pleora has developed a multi-year plan which details our strategy and the steps we will undertake to meet the requirements set out in the policy to ensure compliance with AODA legislation. The accessibility plan will be reviewed and updated at least once every five (5) years. This plan can be provided in an accessible format upon request.

Training

All employees, contractors and consultants who deal with the public on Pleora's behalf will be trained on their responsibilities and obligations under the Customer Service Standard.

All employees, and those who participate in developing Pleora's policies, will be trained on the requirements of the Integrated Accessibility Standards of Information and Communication and Employment, and on the Ontario Human Rights Code as it pertains to persons with disabilities. Training will be appropriate to the duties of the employee.

Training will be provided to new hires as part of the orientation process within the first two weeks of employment. For all others, training will take place as soon as it is practicable and when changes are made to the plan. Upon completion, Pleora will keep a record of the training provided including the dates on which the accessibility training took place.

Review Period

This policy will be reviewed at least once every five (5) years by the Vice President, Human Resources and will be revised in light of any legislative or organizational changes.

Appendix 'A' - Definitions

“Customer”: includes members, vendors, partners and any other third parties with whom Pleora Technologies directly interacts in Ontario.

“Disability”: 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 service animal or on a wheelchair or other remedial appliance or device

- A condition of mental impairment or a development disability;
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

“Barrier” : includes anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, policy or practice;

"Assistive Device": includes any piece of equipment a person with a disability uses to help him or her with daily living. Personal assistive devices include, but are not limited to, wheelchairs, hearing aids, white canes or speech amplification devices.

“Service Animal”: any animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability.

“Support Person”: a person who accompanies a person with a disability in order to help him or her with daily tasks.

“Accessible Format”: a format of communication that may include but is not limited to large print, recorded audio and electronic formats, Braille or other format usable by persons with disabilities.

“Communication Supports”: include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.