
TITLE: AODA Accessibility Policy and Multi-Year Accessibility Plan

FACILITY: Starfield-Lion, Toronto

ISSUED BY: Corporate Counsel

REVISED BY:

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APPROVED BY: President

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NOTE: If you are a person with a disability and require reasonable accommodations to read this document, please contact a member of the Human Resources team.

Statement of Starfield-Lion’s Commitment to Accessibility and compliance with the *Accessibility for Ontarians with Disabilities Act (AODA)*

Starfield-Lion is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under the Employment Standards in the *Integrated Accessibility Standards, Ontario Regulation 191/11*, and as established under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*.

General Provisions

Accessibility Policy and Multi-Year Accessibility Plan

This AODA Accessibility Policy and Multi-Year Accessibility Plan outlines a phased-in strategy to comply with the current and future requirements of the AODA and/or the Regulation. Starfield-Lion will report annually on the progress and implementation of the plan, post the information on our website and will provide it in alternative formats upon request. This AODA Accessibility Policy and Multi-Year Accessibility Plan will be reviewed at least once every five years.

Information and Communications

Accessible Formats and Communication Supports

Starfield-Lion is committed to meeting the communication needs of people with disabilities to members of the public. When asked, we will provide information and communications materials in

accessible formats or with communication supports. This includes publicly available information about our goods, services and facilities, as well as publicly available emergency information.

Website Accessibility

Starfield-Lion will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) website requirements initially at Level A and increasing to Level AA, in accordance with the Integrated Accessibility Standards.

Emergency Information

If Starfield-Lion prepares emergency procedures, plans or public safety information and makes the information available to the public (which it does not currently do), we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

Starfield-Lion has processes in place for receiving and responding to feedback from the public and will ensure that those processes are provided in accessible formats and with communication supports, upon request. We will notify the public about the availability of accessible formats and communication supports.

Employment

Recruitment

The Company notifies employees and the public about the availability of accommodations for job applicants who have disabilities, as follows:

- Job postings - The following statement is included on all job postings: “The Company endeavors to make its recruitment process accessible to any and all users. Reasonable accommodations will be provided, upon request, to applicants with disabilities in order to facilitate equal opportunity throughout the recruitment and selection process. Please contact Loren Lori, Director of Manufacturing, at (416) 789-4354, llore@lionprotects.com. to make a request for reasonable accommodation during any aspect of the recruitment and selection process. This contact information is for accommodation requests only; do not use this contact information to inquire about the status of applications.”
- Interview Requests - The following statement is included in the notification when an applicant is notified that they have been selected for an interview: “Reasonable accommodations are available, upon request, to facilitate the equal participation of candidates with disabilities throughout the interview and selection process.”
- Candidate Testing Requests - The following statement is included in testing requests: “Reasonable accommodations are available to candidates with disabilities. If you are a person with a disability and require accommodation to facilitate your equal participation in our candidate testing (e.g., assessment materials in an accessible format), please let us know.”

- Offer letters - In their offer letter, new employees are advised that “The Company is committed to ensuring a safe, dignified, welcome and accessible environment that respects the dignity, independence, integration and equal opportunity of people with disabilities. A copy of the Company’s policies regarding accessible employment are available on the Company’s Internet webpage <https://www.lionprotects.com/privacy>. If you are a person with a disability and require reasonable accommodation during your employment with the Company, please contact Loren Lori, Director of Manufacturing, at (416) 789-4354, llori@lionprotects.com. The Company will work with you to create an Individual Accommodation Plan (“IAP”) and to ensure that your IAP accurately reflects your accommodation requirements, including any personalized emergency response information that you require (e.g. if you require assistance in the event of an emergency, due to a disability).”

Employee Notification

Starfield-Lion shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to a disability:

- As required to new employees as soon as practicable after they begin their employment; and
- 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 a disability.

Talent and Performance Management

Starfield-Lion’s performance management, career development and redeployment processes will take into account the accessibility needs of employees.

Communication of Policies, Accessible Policies and Communication Supports for Employees

Starfield-Lion will consult with people with disabilities to determine their information and communication needs. Policies will be communicated through the company intranet, Lion’s Den, as well as by regular staff meetings, accessible bulletin boards, and through interpersonal communication with employees.

When an employee with a disability requests it, Starfield-Lion will consult with the employee 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; and
- Information that is generally available to employees in the workplace.
- Examples are: employee handbooks, workplace policies, and training materials

Starfield-Lion will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individualized Accommodation Plans (IAPs)

Starfield-Lion shall have in place a written process for the development of a documented Individual Accommodation Plan for each employee with a disability in accordance with the following principles:

The IAP Process is as follows:

- Employee advises their Manager or Human Resources that they require an accommodation due to a disability. If the employee advises his or her Manager, the Manager is responsible for contacting Human Resources to engage this IAP Process.
- Employee participates in the development of the IAP with Human Resources. The employee may request to Human Resources the participation of one (1) representative from the workplace to participate in this process with the employee.
- Employee provides Human Resources with information and documentation regarding the employee's functional limitations and advises how the Company may be able to accommodate the disability. The Company will consider the employee's proposals however, ultimately it is up to the Company to determine what, if any, reasonable accommodations will be provided, based on the documentation submitted by the employee and the Company's operational needs.
- The Company can, at its discretion, request an evaluation by an outside medical or other expert, at the Company's expense, to assist in assessing potential options to accommodate the employee.
- Human Resources documents the accommodation requirements in the IAP, including any workplace emergency response information that may be required.
- Within one (1) week of finalizing the IAP, the Company will provide the employee with a copy of the IAP in a format which takes into account the individual's disability. A copy is placed in the employee's file and a copy will be provided to the employee's direct supervisor.
- Human Resources takes responsibility for ensuring the plan of action outlined in the IAP is in place.
- Each IAP is reviewed in January of each year by the employee's supervisor or when the Company receives information suggesting that the employee's disability-related needs have changed.

If the Company determines that it's accommodation is not required or if the Company cannot accommodate the employee without undue hardship, the employee will be provided with the reasons for this decision.

The IAP process will be kept as confidential as possible. No information will be released to other team members without the permission of the employee, except as where required for reasonable operational purposes: those who are informed will be advised on a "need to know" basis only (e.g., direct supervisor of the employee).

Return to Work Process

After an employee has been absent from work due to a disability, the Company works with the relevant parties to successfully re-integrate the employee back to work. The Return to Work process is documented in the IAP, and may include the following:

- A Gradual Return to Work schedule
- Ergonomic assessments (e.g., chair, desk, computer, etc.)
- The purchase of items to support the individual (e.g., keyboard, mouse, etc.)
- Restrictions (e.g., no heavy lifting, etc.)
- Time off to attend doctor or specialist appointments
- Other accommodations, as specified by the doctor (e.g., exercising at desk, etc.)

The IAP form is here:

<http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=&ENV=WWE&TIT=accessibility&NO=009-0047E>]

Training

Starfield-Lion is committed to training staff on Ontario's accessibility laws and on accessibility aspects of the Human Rights Code that apply to persons with disabilities. Training will be provided in a way that best suits the duties of employees and other staff members. Paper copies of this policy and associated forms will be available to all employees and it will also be available on Lion's intranet site.

The primary basic training for non-supervisory employees will be reviewing this policy and associated procedures and forms, reviewing a handout that provides an overview of the Integrated Accessibility Standards and by way of the Ontario Human Rights Commission's 20-minute training, which also covers both OHRC and AODA entitled Working Together: The Code and the AODA, or its equivalent.

We will train existing staff, and new employees upon hire. Where needed, employees in management and supervisory roles will receive additional training. All training will be documented including when the training occurred, the training information presented, and who presented the training information. We will conduct new training if there are changes to this policy, or the associated procedures and forms.

Workplace Emergency Response Information

Workplace Emergency Response Information

The Company will work with you to provide any additional reasonable accommodations that may be required in the event of an emergency and will document these measures in your IAP.

If you are a person with a temporary or permanent disability, and require assistance in the event of an emergency, please contact **Levi Mordechai, head of Starfield-Lion Health and Safety Committee** so that the Company can provide you with a personalized workplace emergency response plan, with your input and consent.

The Company will review and update, if necessary, the response plan when:

- a) you change locations;
- b) your overall accommodation needs and/or accommodation plan are reviewed; and
- c) when the Company's general emergency policies are reviewed.

If you require assistance in emergency situations, the Company will provide your personalized workplace emergency response plan to a designated person(s), with your consent and in a way that respects your privacy.

Performance Management, Career Development and Redevelopment

The Company strives to ensure that individuals with disabilities have the same access to career development and training opportunities as all other employees, and will provide reasonable accommodation where applicable. The Company will consider the needs of employees with disabilities during any performance management process and when an employee is moved to a new position or is promoted.

Where an employee with a disability is redeployed to another department or job, the Company will work with that individual to ensure they are trained and accommodated, as is reasonable in the circumstances.

Self-Service Kiosks

Starfield Lion does not use or provide self-service kiosks as defined within the AODA. To the extent that such kiosks are deployed in the future, we will incorporate accessibility into Starfield-Lion's self-service kiosks that are newly installed.

Design of Public Spaces

Starfield-Lion does not currently have public spaces within the meaning of the AODA. To the extent that such spaces are acquired in the future, we will incorporate accessibility into Starfield-Lion's public spaces that are newly constructed or redeveloped on and after January 1, 2017. We will ensure that we follow the requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment). We shall also provide, within our contractual obligations and capabilities, restoration and maintenance of Starfield-Lion's public spaces by ensuring our AODA Accessibility Policy and Multi-Year Accessibility Plan includes procedures for preventative and emergency maintenance of accessible elements in Starfield-Lion's public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

Accessible Customer Service

Starfield-Lion remains committed to servicing all individuals, including customers with disabilities. Starfield-Lion will implement an accessible customer services policy, including providing the required training to applicable employees. A copy of this policy will be posted where it is likely to come to the attention of Starfield-Lion's customers. The Customer Services policy will be provided in a manner that considers the individual's disability, upon request.

Changes to Existing Policies

We will modify or remove an existing policy that does not respect and promote the dignity and independence of people with disabilities.

For More Information

For more information on this accessibility plan, please contact Loren Lori at 416-789-4354, llori@lionprotects.com;

www.Lionprotects.com

Standard and accessible formats of this document are free on request from Loren Lori at 416-789-4354, or llori@lionprotects.com

EXHIBIT A: ACCESSIBILITY ACTION PLAN AND TIMELINE

General Deliverables	Completed?	Legislated Date for Large Employers
Policies & Procedures		
Implement Customer Service Policy		January 1, 2012
Make Customer Service Policy available to the Public		January 1, 2012
Make Customer Service Policy available in alternative formats upon request		January 1, 2012
Implement Accessibility Policy that includes a Statement of Organizational Commitment	Yes	January 1, 2014
Post Accessibility Policy on the Company's website	Yes	January 1, 2014
Make Accessibility Policy available in alternative formats upon request	Yes	January 1, 2014
Accessibility Plan - Multi Year		
Develop Accessibility Plan	Yes	January 1, 2014
Make available to the public	Yes	January 1, 2014
Make available in alternative formats upon request	Yes	January 1, 2014
Review every 5 years	N/A	Ongoing
Training		
Train all applicable employees and contractors in accordance with the Customer Service requirements		January 1, 2012
Train all Ontario employees & volunteers, policy developers, those providing goods or services on behalf of the Company regarding IAS and <i>Human Rights Code</i> .		January 1, 2015
Information & Communications	Completed?	Legislated Date for Large Employers
Emergency Information		
Emergency Procedure Plans or Public Safety Information are inventoried and accessible upon request	Yes	January 1, 2012
Feedback		

Feedback process is in place for receiving and responding to feedback - system is in place and available in accessible formats and with communication supports upon request	Yes	January 1, 2015
Accessible formats and communication supports		
Provide or arrange for accessible formats and communication supports upon request (timely manner, at a cost that is no more than the regular cost charged to other persons)	Yes	January 1, 2016
Website Accessibility		
New Internet Website WCAG 2.0 Level AA (other than closed caption Live pre-recorded audio) (where new post-2014)		January 1, 2014
All internet websites and web content WCAG 2.0 Level AA	Yes	January 1, 2021
Review all content on website up to 2012 to ensure everything is accessible	Yes	January 1, 2021
Employment	Completed?	Legislated Date for Large Employers
Develop Personalised Workplace Emergency Response for staff, on consent and as necessary	Yes	January 1, 2012
Notify employees and public regarding availability of accommodation	Yes	January 1, 2016
Notify applicant of availability of accommodation upon request for assessments or selection process	Yes	January 1, 2016
Inform employees of policies regarding job accommodations	Yes	January 1, 2016
Providing accessible formats and communication supports available to perform job	Yes	January 1, 2016
Have a documented (IAP) in place		January 1, 2016
Have a Return to Work Process in place		January 1, 2016
Ensure performance management processes take into account accessibility needs	Yes	January 1, 2016
Ensure career development and advancement information takes into account accessibility needs	Yes	January 1, 2016
Ensure redeployment process takes into account accessibility needs	Yes	January 1, 2016

Public Spaces	Completed?	Legislated Date for Large Employers
Design of Public Spaces		
Incorporate accessibility regulations in accordance with any contracts relating to our premises as required by the Design of Public Spaces Standard for new developments, redevelopments, or when making major changes to existing space or service related elements	N/A	January 1, 2017
Maintain and repair public spaces within our premises	N/A	January 1, 2017
Develop procedures for preventative and emergency maintenance of accessible elements in public spaces	N/A	January 1, 2017
Develop procedures for dealing with temporary disruptions when accessible elements under public spaces not working	N/A	January 1, 2017
Incorporate accessibility regulations in designing newly constructed service counters and fixed queuing guides	N/A	January 1, 2017
Identify accessible parking space immediately adjacent to Totalcare entrance		N/A (target date of July 1, 2019)

In addition to the above, Starfield-Lion has:

- Reviewed our physical space for elements that create barriers to accessibility and identified areas that may be addressed with our landlord in the future when building improvements are requested.
- Reviewed policies and practices that were barriers to hearing-impaired persons. During the integration of our hearing-impaired employees we engaged outside services to train our supervisors and other employees regarding best working practices with respect to their needs. New practices were introduced to eliminate communications barriers for hearing-impaired employees.
- Introduced Skillsoft on-line training for use as our corporate training and learning system. The Skillsoft platform uses captions in all of its training so that hearing-impaired persons are able to use it effectively.