

Accessibility Policy

Prepared by: Classification: Audience: Leigh Chappell, Director of People Internal All Employees, Contractors, Volunteers External (Upon Request)

Document control:

| Version | Date | Editor | Reviewer | Comments |
|---------|---------------|----------------|-------------------|----------|
| 1.0 | June 11, 2020 | Lauren Freeman | Jennifer Lennox | |
| 1.1 | June 11, 2021 | Leigh Chappell | Izabella Gabowicz | |
| 1.2 | | | | |
| 2.0 | | | | |
| 2.1 | | | | |

Accessibility Policy

Intent

Sensibill is dedicated to providing accessible services and an accessible work environment for all employees, prospective employees, and clients. This policy outlines the company's commitment to the intent and requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), which was established to prevent, identify and remove barriers for persons with disabilities.

This policy ensures Sensibill provides services and employment practices that follow the principles of dignity, independence, integration, and equal opportunity.

Scope

This policy applies to all employees, directors, officers, volunteers, interns and contractors of Sensibill.

General Principles

Establishment of Accessibility Policies and Plans

Sensibill will develop, implement, and maintain policies governing how it will achieve accessibility through these requirements.

We are committed to meeting the accessibility needs of persons with disabilities in a timely manner. This is reflected in policies which upon request will be made publicly available in an accessible format.

We will establish, implement, maintain, and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the Integrated Accessibility Standards Regulation (IASR). Accessibility plans will be made available in an accessible format upon request, and will be posted on the company website.

Sensibill will review and update its accessibility plan once every five years. Annual status reports will be prepared to report on the progress of the steps taken in implementing the companies' accessibility plan. This status report will be posted on our website. If requested, the report will be created in an accessible format.

Training Requirements

Sensibill will provide training for its employees, interns and volunteers regarding the IASR and the Ontario *Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing the companies' policies, and all

other persons who provide goods, services, or facilities on behalf of the company (independent contractors).

Training will be provided as soon as is reasonably practicable, but no later than June 30, 2021. Training will be provided regularly to new employees and as changes to the companies' accessibility policies occur.

We will maintain records on the training provided, when it was provided, and the number of employees who were trained.

Customer Service

Sensibill is committed to providing our services in an accessible manner and communicating with persons with disabilities in ways that take into account their disability. Examples include providing written materials in larger print when requested and ensuring our website and SDK are WCAG AA compliant. If a customer is having difficulty accessing our services, we will discuss the need with the customer and attempt to remove the barrier.

We permit persons with disabilities to use their personal assistive devices while on our premises and welcome support persons and service animals on whom persons with disabilities rely, whether they are customers, visitors or employees.

In the event of a planned or unexpected disruption to our services or facilities, we will consider the circumstances at the time and determine whether there are potential implications for persons with disabilities.

Feedback about the delivery of services to persons with disabilities is welcomed, helping us identify areas requiring change. Feedback may be provided by email or telephone. We will respond to the feedback within a reasonable amount of time.

Recruitment, Assessment and Selection

Sensibill will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, the company will consult with the applicant and provide or arrange for suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Successful applicants will be made aware of the company's policies and support for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

Sensibill will ensure that employees are aware of policies for employees with disabilities and any changes to these policies as they occur. The company will provide the information required to new employees as soon as practicable after they begin their employment. If an employee with a disability requests it, the company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Workplace Emergency Response Information

Where required, Sensibill will create individualized workplace emergency response plans for employees with disabilities. This information will be created in consultation with the employee and will be customized to meet the needs of the employee who requires assistance, whether the disability is permanent or temporary.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; or
- The company reviews general emergency response policies.

Documented Individual Accommodation Plans

Sensibill will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The development process for these plans will include:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed individually;
- The ways in which the company can seek outside expert advice to help determine an employee's accommodation needs
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and

The individual accommodation should also include information regarding accessible formats, communication supports (upon request), individualized workplace emergency response information, and any other accommodation provided.

Return to Work

Sensibill will develop and implement return-to-work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work.

This process will outline the steps the company will take to enable a smooth return to work for the employee. All steps and individual accommodation plans will be documented and created in consultation with the employee.

Performance Management and Career Changes

Sensibill will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

Built Environment

Sensibill does not have responsibility or control over public facilities or spaces, including any office leased by Sensibill for its exclusive use. Consequently, we cannot assure employees, visitors or clients that the barriers imposed outside of the premises we may be located in will be satisfactorily removed. We will work with the landlords to explore any reasonable options for eliminating barriers.

Review

This policy will be reviewed regularly to ensure that it reflects current practices of Sensibill as well as legislative requirements.

Acknowledgement and Agreement

I acknowledge that I have read and understand the Accessibility Policy of Sensibill. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules set forth by this policy, I may face disciplinary action up to and including termination of employment.

Signature: _____

Date: _____

Appendix

Definitions

Accessible Format: Includes large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Communication Supports: Includes captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

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

Career Development and Advancement: Additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization or any combination of them. Both additional responsibilities and employee movement are usually based on merit, seniority, or a combination of both.

Performance Management: Activities related to assessing and improving employee performance, productivity, and effectiveness with the goal of facilitating employee success.

Redeployment: The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

Support Person: In relation to a person with a disability, another person who accompanies a person with a disability in order to help with communication, mobility, personal care, or medical needs, or with access to goods, services, or facilities.