

Toronto Zenith
Accessibility Policy



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Accessibility Policy

This Accessibility Policy outlines the strategy of Toronto Zenith Contracting Ltd. (“Toronto Zenith” or the “Company”) to achieve accessibility and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

Statement of Commitment:

Toronto Zenith is committed to treating all people in a way that allows them to maintain their dignity and independence. The Company believes in integration and equal opportunity. The Company is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

Toronto Zenith is committed to providing our services, programs, goods and facilities to persons with disabilities in a manner that:

- Is free from discrimination
- Seeks to provide integrated services
- Is in an accessible format, and
- Takes into consideration a person’s disability

Toronto Zenith relies on all of its employees, volunteers and partners to assist with maximizing accessibility within the Company by:

- Identifying potential barriers and proposing ways to remove them
- Participating in training
- Learning how to interact with persons with disabilities, including those who require the use of a support person or service animal
- Learning how to use existing accessibility devices

Accessibility Coordinator:

Toronto Zenith has appointed an Accessibility Coordinator who will provide primary oversight and guidance on the implementation of AODA accessibility standards, in conjunction with the Human Resources Department and Management. The Accessibility Coordinator will prepare accessibility reports, facilitate access for persons with disabilities to the building or premises, and address all other matters to comply with the AODA.

As appropriate, the Accessibility Coordinator will also support and work with managers, supervisors and employees to ensure ongoing compliance, to remove barriers, and to improve accessibility. The Accessibility Coordinator will review the Company’s various accessibility policies, practices and procedures at least once every calendar year.

Accessibility Policies:

Toronto Zenith will develop, implement and maintain any other accessibility policies, plans or procedures and take all other measures as may be required by the *AODA* or any of the regulations or accessibility standards.

Multi-Year Accessibility Plan:

Toronto Zenith will maintain a Multi-Year Accessibility Plan (“Accessibility Plan”) which will be made available in an accessible format, upon request. The Accessibility Plan will be reviewed and updated regularly, but no less than once every five (5) years.

In addition, Toronto Zenith will maintain policies governing how we will meet our requirements under the *AODA*, including policies related to customer service, employment, information and communication. Toronto Zenith will provide copies of these policies in an accessible format, upon request.

Information and Communication:

Toronto Zenith will consult with people with disabilities to determine their information and communication needs. Accessible formats and communication supports are available upon request.

The Company’s commitment does not necessarily apply to products and product labels, unconvertible information or communications and information that Toronto Zenith does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, Toronto Zenith will provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible as well as a summary of the unconvertible information or communications.

Training:

In accordance with the *AODA*, Toronto Zenith will provide training to employees, volunteers and other staff on Ontario’s accessibility laws and on the *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees, volunteers and other staff.

This training will include instruction on the following:

- Purposes and requirements of the *AODA*, including the Customer Service Standard Regulation 429/07) and the Integrated Accessibility Standards (Regulation 191/11)
- How to interact and communicate with persons with various types of disabilities as well as those who use an assistive device, or require the assistance of a service animal or support person

- How to use equipment or devices available from the Company that may help with the provision of goods or services to a person with a disability
- What to do if a person with a particular type of disability is having difficulty accessing our goods or services

Training will take place as soon as practicable and upon completion the Accessibility Coordinator will keep a record of the training provided, including the date on which the accessibility training took place and the number of people trained.

Contraventions:

The Accessibility Coordinator, as well as managers and supervisors of the Company, will monitor existing and new practices and procedures to ensure compliance. Failure by any employee to comply with this Accessibility Policy, the Multi-Year Accessibility Plan, the Customer Service Policy, or any other policy, practice or procedure related to accessibility issues, the removal of barriers, or the *Human Rights Code*, may result in disciplinary action, up to and including dismissal.

More Information:

For more information on this or any other accessibility policy, or to receive a copy of any of the policies or other documents or records required by the AODA, please contact Toronto Zenith's Accessibility Coordinator at:

Asher Roffel, Accessibility Coordinator
226 Bradwick Drive Concord, ON L4K 1K8
accessibilitytz@torontozenith.com
(905) 738-1500 x 29

This Accessibility Policy will be made publicly available. Accessible formats of this document are available for free upon request.

Multi-Year Accessibility Plan

Purpose:

This Multi-Year Accessibility Plan (“Accessibility Plan”) outlines the short and long-term strategies of Toronto Zenith to prevent and remove barriers, improve opportunities for people with disabilities, and otherwise meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

Statement of Commitment:

Toronto Zenith is committed to treating all people in a way that allows them to maintain their dignity and independence. Toronto Zenith believes in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *AODA*.

Toronto Zenith has appointed an Accessibility Coordinator with the mandate of ensuring compliance with the Company’s obligations under the *AODA*. However, the Company also relies on all of its employees, volunteers and partners to assist with maximizing accessibility within the Company by:

- Identifying potential barriers to accessibility and proposing ways to remove them
- Participating in training
- Learning how to interact with persons with disabilities, including those who require the use of a support person or service animal
- Learning how to use existing accessibility devices

Strategy for Compliance:

The Accessibility Coordinator, including his or her designates, will regularly but no fewer than once per year:

- Review the AODA, regulations and accessibility standards with a view to ensuring ongoing compliance
- Review existing policies and strategies and evaluate their effectiveness at removing barriers to accessibility, making changes as needed
- Identify new barriers to accessibility and develop and implement removal strategies
- Review all individualized workplace emergency response information, making changes as needed
- Evaluate physical accessibility to all premises owned or operated by Toronto Zenith in Ontario in which the Company does business to ensure barrier-free accessibility

- Evaluate communication methods as well as the manner in which goods and services are provided to the public and other third parties to ensure barrier-free accessibility
- Arrange for and/or provide necessary training
- Prepare and file any required accessibility compliance report(s)
- Ensure all required documents required by the *AODA*, regulations and standards are posted in appropriate locations and otherwise made available in accessible formats

Within the first three (3) months of each calendar year, the Accessibility Coordinator, including his or her designates, will review the *AODA*, regulations and standards to identify upcoming compliance obligations and establish a schedule for achieving compliance within the requisite timelines.

Self-Service Kiosks:

Toronto Zenith will have regard to the accessibility needs of persons with disabilities when designing, procuring or acquiring self-service kiosks.

Employment:

Toronto Zenith is committed to fair and accessible employment practices which are inclusive of persons with disabilities.

Recruitment:

Toronto Zenith will review its recruitment and assessment practices to ensure compliance with the Employment Standard by no later than **January 1, 2016**. The Company will take the following steps to notify the public and staff that, when requested, the Company will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- Information will be posted about the availability of accommodations for applicants with disabilities in the Company's recruitment process
- Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request
- An applicant requesting accommodation will be consulted about how to best provide accommodation in a manner that takes into account the applicant's disability
- Successful applicants will be notified about the Company's policies for accommodating employees with disabilities as part of their offer of employment

Individual Accommodation Plans and Return to Work Processes:

By no later than **January 1, 2016**, the Company will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Inform employees, as soon as practicable after they commence employment, of the 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 disability
- 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
- Implement a written process for developing and maintaining documented individual accommodation plans for employees with disabilities, including: (1) information regarding accessible formats and communications supports, and (2) individualized workplace emergency response information
- Implement a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations, which will outline the steps the Company will take to facilitate the employee's return to work

Performance Management, Career Development and Redeployment Processes:

By no later than **January 1, 2016**, the Company will take into account the accessibility needs of its employees with known disabilities as well as any individual accommodation plans when applying performance management, career development and redeployment processes.

Upon request, Toronto Zenith will consult with an employee with a disability 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, as well as information that is generally available to employees in the workplace.

Website / Communications:

Toronto Zenith will consult with its information technology and website support partners to ensure that:

- All new websites and content on those sites conform with WCAG 2.0, Level A by no later than **January 1, 2014**
- All websites and content conform with WCAG 2.0, Level AA by no later than **January 1, 2021**

The Accessibility Coordinator, including his or her designates, will also consult with Toronto Zenith's human resources, client relations, information technology and website support partners to ensure that:

- Existing feedback processes are accessible to persons with disabilities upon request by **January 1, 2015**
- All publicly available information is made accessible upon request by **January 1, 2016**

Training:

In accordance with the *AODA*, regulations and standards, Toronto Zenith will provide training to our employees, volunteers and other staff on Ontario's accessibility laws and on the *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees, volunteers and other staff and will include instruction on:

- Purposes and requirements of the *AODA*, including the Customer Service Standard (Regulation 429/07) and the Integrated Accessibility Standards (Regulation 191/11)
- How to interact and communication with persons with various types of disabilities as well as those who use an assistive device(s), or require the assistance of a service animal or support person
- How to use equipment or devices available from the Company that may help with the provision of goods or services to a person with a disability
- What to do if a person with a particular type of disability is having difficulty accessing our goods or services

Toronto Zenith will take the following steps to ensure employees, volunteers and other staff are provided with the training needed to meet Ontario's accessible laws by January 1, 2015:

- Develop training materials on the Integrated Accessibility Standards and the *Human Rights Code*
- Develop a process to maintain records of who has received training and the dates on which accessibility training took place
- Develop a process whereby new employees will receive training as soon as practicable at the start of their employment
- Provide the established training to all employees, volunteers and other staff

Notwithstanding the timelines set out above, training will take place as soon as practicable throughout 2015 for all current affected employees, volunteers and other staff of the Company.

Design of Public Spaces:

Toronto Zenith will ensure that all public spaces owned or operated by Toronto Zenith that are newly constructed or redeveloped beginning **January 1, 2017**, comply with the Built Environment standards as set out in the Integrated Accessibility Standard, including standards relating to (but not necessarily limited to) the following elements:

- Exterior paths of travel (outdoor sidewalks, walkways, ramps, stairs and curbs)
- Parking (number and type of accessible spaces, aisles and signage)
- Services (service counters, queuing guides and waiting areas)

Toronto Zenith will also develop procedures for preventative and emergency maintenance of the accessible elements in public spaces, as well as dealing with temporary disruptions when accessible elements in public spaces are not in working order.

Availability of Accessibility Plan:

This Accessibility Plan will be included in the Employee Handbook and will be provided in an accessible format, upon request. This Accessibility Plan will be reviewed and updated regularly, but no less than once every five (5) years.

Feedback Processes:

By **January 1, 2015**, the Company will review its internal and external feedback processes (if any) to ensure they are accessible to people with disabilities upon request. The Company will also ensure that by January 1, 2016, all publicly available information is made accessible in a timely manner, if requested.

More Information:

For more information on this or any other accessibility policy, or to receive a copy of any of the policies or other documents or records required by the AODA, please contact Toronto Zenith's Accessibility Coordinator at:

Asher Roffel, Accessibility Coordinator
226 Bradwick Drive Concord, ON L4K 1K8
accessibilitytz@torontozenith.com
(905) 738-1500 x 29

This Accessibility Policy will be made publicly available. Accessible formats of this document are available for free upon request.

Accessible Customer Service Policy

Providing Goods and Services to Customers With Disabilities

Scope:

This Policy applies to all employees, directors and officers of Toronto Zenith who deal with our customers in Ontario, including persons who act as our agents (such as contractors and independent consultants), and to all persons who are responsible for developing and updating policies about how we deal with our customers in Ontario.

Purpose:

It is the objective of Toronto Zenith to create and maintain a climate of mutual respect in which all persons who access our services, goods and facilities will be able to do so irrespective of any disability they may have. This Policy is created in accordance with the *Accessibility for Ontarians with Disabilities Act* (the “AODA”) and specifically the Accessibility Standards for Customer Service.

Our business practices and policies will strive to ensure that all of our policies, practices and procedures are consistent with the core principles as outlined in the AODA, which include:

- **Dignity** – Goods and services and access to our facilities are to be provided to all persons with disabilities in a manner that is respectful to the person and all such persons shall be treated as valued customers deserving of service.
- **Equality of Opportunity** – All persons with disabilities are entitled to be given an opportunity to obtain, use and benefit from our goods, services and facilities equal to that of any other of our customers.
- **Integration** – All persons with disabilities are entitled to benefit from our goods, services and facilities in the same place and in the same or similar manner as any other customer. This may require a different format and maintaining a flexible approach wherever possible, taking into account the person’s individual needs. The objective is to attempt inclusiveness and full participation to the extent possible.
- **Independence** – Goods and services and access to our facilities shall be provided in a way that respects the independence of persons with disabilities and means respecting the person’s right to do it themselves and to choose how they wish to receive services. Any assistance offered must be with the express permission of the person.

Definitions:

The following definitions apply for the purposes of this Policy:

“**Disability**” means the same under the *AODA* as it does under the *Ontario Human Rights Code*:

- (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 coordination, 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*

“**Customer**” refers to anyone who is in receipt of the goods and services we provide, whether the person is a member of the general public, the end-user of our goods or services, a distributor, or a representative of another organization.

“**Employee**” refers all employees, officers, directors, students, volunteers, or contractors of Toronto Zenith who deal with any of our customers (or potential customers) in Ontario, whether working on a full-time or part-time basis.

Communication and Assistive Devices:

For the purposes of this policy, an “**assistive device**” is a tool, technology or other mechanism that enables a person with a disability to maintain their independence in everyday life by performing tasks and activities such as moving, communicating or lifting.

In order to promote understanding of the content and intent of the communication, all communication with people with disabilities will be done in a manner that takes into account the disability. To that end, persons using assistive devices will be permitted—where possible and permitted by law—to use those devices while on any part of our premises which are open to the public. It is understood, however, that the use and safety of any personal assistive device is the responsibility of the person with the disability.

Where the use of an assistive device cannot be used because of some barrier, attempts will be made to remove the barrier or the person with the disability will be asked how he or she can be accommodated and/or what alternative methods may be available to assist the person in accessing our goods, services or facilities.

Some of the assistive devices which are currently available internally which may assist with communication issues include: telephones, email, video conferencing system, pen and paper. Other assistive devices which may assist with removing other barriers to accessibility might include: elevators, ramps, wheelchair accessible washrooms, automatic doors, and low-height counters.

All employees will be trained on how to communicate with persons with disabilities as well as on how to use each of the above assistive devices, as appropriate for their position.

Service Animals:

For the purpose of this policy, an animal is a service animal for a person with a disability if:

- (1) It is readily apparent that the animal is used by a person with a disability for reasons relating to his or her disability; or
- (2) The person provides a letter from a physician or nurse confirming the need for the animal for reasons relating to a disability.

This includes any animal used by a person with a disability for reasons relating to the disability, such as guide dogs, hearing alert animals (alerts owner to sounds), seizure alert animals (alerts owner to oncoming seizure; steers owner from danger during seizure), and psychiatric service animals (retrieves and prompts owner to take medicine; leads owner out of crowds; retrieves or activates medical alerts).

A person with a disability who is accompanied by a service animal is permitted access to all parts of Toronto Zenith's premises that are open to the public, provided that the animal is not otherwise excluded by law. If for some reason the service animal is excluded by law, we will attempt to find an alternate means within a reasonable time frame to provide the person with the disability access.

If it is not readily apparent that the animal is a service animal, Toronto Zenith reserves the right to ask the person with the disability to provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability. However, the decision about whether to request such a letter shall be made by the general manager of each facility.

Staff will receive training on how to interact with a person with a disability who is accompanied by a service animal.

Support Persons:

For the purposes of this policy, a support person is any person who accompanies a person with a disability in order to assist that person with their disability, such as providing assistance with mobility issues, communication, personal or medical needs, or with accessing goods or services.

A person with a disability who is accompanied by a support person will be allowed to have that person accompany him or her on our premises. To preserve confidentiality, consent forms may have to be signed by both the customer as well as the support person which authorizes us to discuss confidential information in the presence of the support person.

Staff will receive training on how to interact with persons with disabilities who are accompanied by a support person, including:

- Communicating directly with the customer, rather than the support person
- Addressing potential issues of confidentiality

Notice of Temporary Disruption:

In the event of a planned or unexpected disruption to our services or facilities, such as access to our building, we will notify customers promptly of any such planned or unexpected disruption as follows:

- Where a meeting is scheduled with a customer, the customer shall be notified of the temporary disruption by email in advance of the meeting so that appropriate alternative arrangements can be made
- The information will be posted in a conspicuous place on the website
- A copy of the notice will be posted at the entrance of all affected buildings operated by Toronto Zenith to which public have access

Where possible, the notice will be posted a minimum of one (1) week in advance of any planned or expected shutdowns.

The posted notice will include information about:

- The date, time and location of the disruption
- The reason for the disruption
- The anticipated length of time, and
- A description of alternative facilities or services available, if any

Training for Staff:

Training will be provided to everyone covered by this Policy, and will include ongoing training when changes are made to this Policy or any related change to other policies, practices or procedures. This training will be provided to all new employees as soon as possible following hiring, but no later than one month post-hiring. Records of this training will be kept on file.

Training will include:

- An overview of the AODA
- The specific requirements of the Customer Service Standard
- A review of this Policy
- How to interact and communicate with people with various disabilities and with those who use assistive devices or require the assistance of a service animal or support person
- How to use the assistive devices we already have
- What to do if a person with a disability is having difficulty accessing our goods, services or facilities

Feedback Process:

Customers, other members of the public as well as employees are all invited to provide feedback about the way in which we provide our goods and services to people with disabilities. This may include areas that require changes or improvements.

All feedback can be provided via telephone, email or in writing and directed to:

Asher Roffel, Accessibility Coordinator
226 Bradwick Drive Concord, ON L4K 1K8
accessibilitytz@torontozenith.com
(905) 738-1500 x 29

If a person's disability prevents them from providing feedback by email or in writing, alternative arrangements will be made which take into account the person's disability.

All feedback relating to accessibility of our services will be directed to the Accessibility Coordinator. We will attempt to respond in the same format as the feedback is received. When complaints or concerns are received, every effort will be made to respond within two (2) weeks of the receipt of the complaint or concern, or earlier where circumstances dictate.

Modifications to This or Other Policies:

All of our policies, practices and procedures will be reviewed on an ongoing basis to ensure compliance with the *AODA*. Any policy, practice or procedure that does not comply with and promote the dignity and independence of people with disabilities will be modified or removed.

Accessibility of Documents:

This Policy and all other documents required by the *AODA* pertaining to our policies, practices and procedures on the provision of services to persons with disabilities can also be obtained by contacting the Accessibility Coordinator using the contact information set out above. Upon request, reasonable attempts will be made to provide these documents to clients with disabilities in a format that takes into account the person's disability.

Notice of availability of these documents will be posted on our website and posted in a conspicuous place at each Toronto Zenith location where this Policy applies.

Accessibility for Individuals with Disabilities

Dear Valued Customers:

Toronto Zenith is committed to improving accessibility for individuals with disabilities and complying with the Accessibility Standards for Customer Service addressed in Ontario Regulation 429/07 (“Customer Service Standard”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

Feedback:

We would like to hear your comments, questions and suggestions about the provision of our goods or services to people with disabilities. Any feedback should be addressed to our Accessibility Coordinator, and can be in writing or emailed to the following contact:

Asher Roffel, Accessibility Coordinator
226 Bradwick Drive Concord, ON L4K 1K8
accessibilitytz@torontozenith.com
(905) 738-1500 x 29

Customers who wish to provide feedback verbally can do so to any Toronto Zenith employee or by requesting a copy of our Accessibility Feedback Form. Customers that provide feedback will receive an acknowledgment of their feedback along with any resulting actions based on concerns or complaints that were submitted.

Availability of Documents:

You may request a copy of Toronto Zenith’s Accessible Customer Service Policy, or any other document required under the AODA or the Customer Service Standard by contacting the Accessibility Coordinator using the above- noted contact information.

Thank you,



Toronto Zenith Contracting Ltd.

Accessibility Feedback Form

Toronto Zenith has established a process for receiving and responding to feedback about the manner in which we provide our goods and services to persons with disabilities. Feedback may be provided in person, by telephone, in writing or by delivering electronic text by email or other methods to the Accessibility Coordinator. This form is intended to provide a consistent format for receiving feedback information, but is not meant to be the exclusive format for receiving feedback.

Feedback

Date: _____ Format Received: _____

Personal Information

Name: _____

Address: _____

Telephone: _____

E-mail: _____

Filled out by Toronto Zenith employee? **Yes / No**

If yes, name: _____

Subject: _____

Details: _____

The personal information provided enables us to respond to your feedback or complaint and will only be used for that purpose. You will not be placed on any mailing lists, nor will your information be released to any third party, except as may be required by law. Questions about this collection should be directed to the attention of the Accessibility Coordinator:

Asher Roffel, Accessibility Coordinator
226 Bradwick Drive Concord, ON L4K 1K8
accessibilitytz@torontozenith.com
(905) 738-1500 x 29

Toronto Zenith is committed to improving accessibility for individuals with disabilities and complying with the Accessibility Standards for Customer Service addressed in Ontario Regulation 429/07 (“Customer Service Standard”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”). In accordance with section 5 of the Customer Service Standard, Toronto Zenith provides the following:

NOTICE OF TEMPORARY DISRUPTION

The following service is temporarily unavailable:

This service will be unavailable from:

The reason for this service disruption is:

Alternative services may be found at:

For more information about this service disruption, please contact:

Toronto Zenith thanks you for your patience.