



NO.: EEHR024

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exactEarth Accessibility Policy  
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## PURPOSE

This accessibility policy outlines how exactEarth Ltd. complies with *Ontario Regulation 191/11 Integrated Accessibility Standards (IASR)* under the *Accessibility of Ontarians with Disabilities Act, 2005 (AODA)*.

The *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* was created to develop, implement, and enforce accessibility standards or rules so that all Ontarians will benefit from accessible services, programs, spaces, and employment. The IASR sets these standards to help organizations to prevent or remove barriers that limit the things people with disabilities can do, the places they can go, and the attitudes of service providers toward them.

The AODA complements the requirements under the *Ontario Human Rights Code (OHRC)* and other laws that protect disabled persons from discrimination or harassment.

### Our Commitment

exactEarth Ltd. is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who enter the premises, work for the company, access information provided by the company, or use the company's goods and services.

exactEarth Ltd. will work to break down the barriers that prevent or limit persons with disabilities from employment, receipt of goods and services, and information and communication through the implementation of accessibility standards.

## SCOPE

This policy applies to all employees, volunteers, agents and/or others who deal with the public or other third parties on behalf of exactEarth Ltd. in Ontario.

exactEarth is a "**small organization**" as defined under regulation 191/11 as exactEarth has less than 50 employees located in Ontario.

## DEFINITIONS

AODA 'employee' does not apply in respect of volunteers and other non-paid individuals except where specifically noted in the Act and/or regulations.

AODA 'customer' definition includes everyone who interacts with our organization, such as customers, suppliers, vendors, consultants and any other third party.



Accessible Formats may include, but are not limited to, large print, record audio and electronic formats, braille, and other formats usable by persons with disabilities.

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

Conversion Ready means an electronic or digital format that facilitates conversion into an accessible format.

Disability, as defined by the AODA, includes, but is not limited to:

- 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, amputations, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
  - a. A condition of mental impairment or a developmental disability
  - b. A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
  - c. A mental disorder; or
  - d. An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

IAP Individualized Accommodation Plan.

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

Redeployment means 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.

Service Animals: any animal that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability.



If it not readily apparent that the animal is being used for reasons relating to a person's disability, exactEarth Ltd. may request verification. Verification may include:

- A letter from a physician or nurse confirming that the person requires the animal for reasons related to a disability
- A certificate of training from a recognized guide dog or service animal training school

Support Person: any person who accompanies a disabled person to help with communication, mobility, personal care, medical needs and/or access to goods, services or facilities.

Personal Assistive Devices: any device that is used, designed made or adapted to assist persons with disabilities in performing various, everyday task such as moving, communicating, reading, writing or lifting.

Personal assistive devices cover a broad range of products, including, but not limited to: wheelchairs, power chairs, walkers, white canes, assistive listening devices, and oxygen tanks.

## PROCEDURES

### 1. TRAINING

exactEarth Ltd. will provide training for its employees and volunteers and individuals who are responsible for developing the companies' policies, and all other persons who provide goods, services, or facilities on behalf of the company.

Training will include a review of the purpose the AODA, IASR and the *Ontario Human Rights Code* as they pertain to individuals with disabilities. A review of the requirements of the customer service standards, including:

- Instructions on how to interact and communicate with people with various types of disabilities
- Instructions on how to interact with people with disabilities who:
  - Use assistive devices
  - Require the assistance of a guide dog or other service animal; or
  - Require the use of a support person (including the handling of admission fees)



Instructions on what to do if a person with a disability is having difficulty accessing our services.

Training will be provided as soon as it is reasonably practicable. Training will be provided during orientation to new employees and as changes to the companies' accessibility policies occur.

## 2. ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Unless deemed unconvertible, exactEarth Ltd. will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

exactEarth Ltd. will account for the person's accessibility needs when customizing individual requests and will consult with the individual making the request to ensure suitability.

exactEarth Ltd. will make the availability of accessible formats and communication supports publicly known.

### Exceptions

The Information and Communications Standards do not apply to:

- Products and product labels
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

### Unconvertible Information or Communications

If it is determined in consultation with the requesting party that information or communications are unconvertible, exactEarth Ltd. will ensure that the individual who made the request is provided with an explanation and a summary of the information.

exactEarth Ltd. will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

### 3. CUSTOMER SERVICE

All goods and services provided by exactEarth Ltd. will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation* under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

#### **PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES**

exactEarth will make every reasonable effort to ensure that our policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services, provided this does not present a health and safety risk
- Using alternative methods when possible, to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner
- Taking into account individual accommodation needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

#### **3.1 Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing goods, services, or facilities of exactEarth Ltd.

In cases where the assistive device represents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure access to goods and services, up to the point of undue hardship.

#### **3.2 Billing**

exactEarth Ltd. is committed to providing accessible notices and invoices to all our customers. For this reason, notices and invoices will be provided in alternative formats upon request.

### **3.3 Service Animals**

Persons with disabilities may enter exactEarth Ltd. premises accompanied by a service animal and keep the animal with them, provided the public has access to such premises, and the animal is not otherwise excluded by law. Alternative arrangements would be explored in situations where a service animal is not permitted.

While visiting exactEarth Ltd. facilities, it is the responsibility of the person with a service animal to control the animal at all times.

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

### **3.4 Support Person**

Persons with disabilities may enter exactEarth Ltd. premises accompanied by a Support Person and have access to that Support Person at all times.

exactEarth Ltd. may require a person with a Disability to be accompanied by a Support Person while on premises, in situations where it is necessary to protect the health and safety of the person with a Disability, or the health and safety of others on company premises.

Consent from the person with a Disability may be required when communicating private issues related to the person with a Disability, in the presence of a Support Person.

### **3.5 Emergency Notification**

exactEarth Ltd. will provide emergency information, plans and procedures, maps and warning signs at evacuation points, and any other emergency alert information, in accessible formats or with appropriate communication supports, upon request.

The company will:

- Work with any individuals requesting information and to see how to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and
- If a person with a disability requires assistance from a support person in case of an emergency, make sure an employee is available to act as such.

## 4. EMPLOYMENT

exactEarth Ltd. will make every effort to identify, remove, and prevent barriers by developing inclusive employment procedures that support persons with disabilities with accommodations during the recruitment and selection stages, and throughout the employment life cycle.

### 4.1 Recruitment and Hiring

exactEarth Ltd. understands that improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can expand the pool of talented candidates.

exactEarth Ltd. notifies employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This includes specifying that accommodation is available for applicants with disabilities, on job postings.

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 supports for accommodating people with disabilities. This includes notification of exactEarth Ltd.'s policies on accommodating employees with disabilities in our offer of employment letters.

The company interview process will focus on experience and skills and will not discriminate against candidates who have a disability or require an accommodation. exactEarth Ltd. is committed to hiring decisions that are unbiased and based on qualifications and past experience.

### 4.2 Informing Employees of Supports

exactEarth Ltd. 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 as part of their orientation.

### 4.3 Accessible Formats and Communication Supports for Employees

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. Whenever possible, information should be created in a 'Conversion Ready' format so that it is possible for the employee to access the material using their prescribed assistive devices.

#### **4.4 Workplace Emergency Response**

exactEarth Ltd. shall provide individualized workplace emergency response information to employees who have a Disability for the four points below:

- If the Disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee's Disability
- If the employee requires assistance, and with the employee's consent, provide the workplace emergency information to the person designated by exactEarth Ltd. to provide assistance to the employee
- As soon as practicable after becoming aware of the need for accommodation due to the employee's Disability
- Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.

#### **4.5 Documented Individual Accommodation Plan**

The duty to accommodate is required of all employers, in all jurisdictions in Canada, and encompasses providing respect and dignity, individualized accommodation, integration and participation, and barrier-free designs. exactEarth Ltd. will provide individual accommodations to support the needs of employees with disabilities. Personalized accommodation plans will be designed to allow employees to contribute and participate in job related functions and activities to the best of their abilities. The process of accommodating individuals will take a consultative approach and is a shared obligation of the company, the employee, and any applicable professionals required to assist the employee throughout the process.



### Return to Work

exactEarth Ltd. is committed to a supportive return-to-work program and will develop and implement return-to-work processes for employees who are absent from work due to a disability and require accommodations in order to return to work. The company will work with the employee to develop an individualized return-to-work plan and support the employee in the transition period by addressing any barriers. The return-to-work process will outline the steps the company will take to facilitate the employee's return to work and use documented individual accommodation plans.

### Inability to Accommodate

exactEarth Ltd. will provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would create a health and safety hazard or cause unreasonable costs for the organization.

Where a necessary accommodation is found to cause undue hardship on the organization, the company will work to find a fair and equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.

## **4.6 Performance Management and Career Changes**

exactEarth Ltd. 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.

## **5. NOTICE OF TEMPORARY DISRUPTION**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of exactEarth Ltd. exactEarth Ltd. will make reasonable effort to provide employees and other persons who may be conducting business on exactEarth Ltd. property with notice in the event of a disruption in the facilities or services usually used by people with disabilities.

This notice will include information about the effect of the disruption, the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. We will not be able to give adequate notice in case of an emergency temporary disruption however when needed, individual accommodation plans will be in place to ensure employees or prospective employees with disabilities will have sage procedures to follow.



## 6. FEEDBACK

exactEarth Ltd. shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available by posting this policy on the exactEarth Ltd. website. Feedback can be provided through a variety of mechanisms, such as by phone, e-email, text message or by mail.

exactEarth Ltd. will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

### Submitting Feedback

Customers can submit feedback to:

Angela Jardine, Human Resources Manager  
519-620-5867  
260 Holiday Inn Drive, Unit 30, Building B  
Cambridge, ON, N3C 4E8  
angela.jardine@exactearth.com

Persons who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

## RESPONSIBILITY

### Human Resources Department

Must ensure that all current and prospective employees are aware of and understand their rights as they relate to AODA and the OHRC, including the notification of (i) availability of accommodation for applicants with disabilities in the recruitment process; (ii) providing or arranging, upon request, the provision of Accessible Formats and Communication Supports for persons with disabilities; and (iii) when making offers of employment, notifying the successful application of this exactEarth policy for accommodating employees with disabilities.

Provide information to all employees of this exactEarth accessibility policy to support and accommodate employees with disabilities (and provided employees updated information when this policy is changed).



### Managers

All managers shall attend training as necessary to ensure knowledge of the requirements of accessibility standards referred to the Regulation 191/11 and the OHRC accommodation procedure.

All managers shall ensure prospective and current employees are treated equitably when requesting accommodation and in accordance with the AODA and regulation 191/11.

### Employees

Shall attend training as necessary to ensure knowledge of relevant accommodation procedures and employee rights under the AODA.

## **ADMINISTRATION**

This policy has been developed to break down barriers and increase accessibility for persons with disabilities. If you have any questions or concerns about this policy or its related procedures, please contact:

Angela Jardine, Human Resources Manager  
519-620-5867  
260 Holiday Inn Drive, Unit 30, Building B  
Cambridge, ON, N3C 4E8  
angela.jardine@exactearth.com

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

## **REFERENCES**

AODA	<i>Accessibility for Ontarians with Disabilities Act (2005)</i>
IASR	<i>Integrated Accessibility Standards, O.Reg. 191/11</i>
OHRC	<i>Ontario Human Rights Code (1990)</i>
OHSA	<i>Occupational Health and Safety Act (2012)</i>
WSIA	<i>Workplace Safety and Insurance Act, 1997.</i>