

## WFS' Accessibility Policies

### Accessibility Policies Statement

WFS Ltd. ("WFS" or the "Company") is committed to providing equal treatment and opportunity to people with disabilities with respect to accessing services, accommodation, and employment in a way that respects their dignity and independence. WFS 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 Accessibility for Ontarians with Disabilities Act, 2005 ("AODA").

### Purpose

The Integrated Accessibility Standards, Regulation 191/11 ("IASR") under the AODA establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment, and the design of public spaces. The Accessibility Standards for Customer Service, Regulation 429/07 under the AODA establishes accessibility standards for providing services to persons with disabilities. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario Human Rights Code. The purpose of these policies is to put in practice our responsibilities under the AODA and to ensure that WFS complies with the Government of Ontario's accessibility standards.

### Application

WFS is a designated large private organization under the AODA that strives to meet the accessibility needs of its team members and the public it serves. As such, the practices and procedures in these Accessibility Policies apply to all WFS team members, volunteers, and individuals that provide services or interact with people with disabilities on behalf of the Company.

### Definitions

**Assistive Devices** – Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids)

**Communication Supports** – Supports facilitating effective communications, including, captioning, alternative and augmentative communication supports, plain language and sign language

**Disability** – As per the Ontario Human Rights Code, means:

- 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 co-ordination, 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.

**Employees/Team Members** – Every person who deals with members of the public or other third parties on behalf of WFS, whether the person does so as a team member, agent, volunteer, or otherwise

**Persons with Disabilities** – Individuals who have a disability as defined under the Ontario Human Rights Code (and above)

**Service Animals** – Animals individually trained to do work or perform tasks for the benefit of a person with a disability

**Support Persons** – Any persons, whether a paid professional, volunteer, family member, or friend, who accompany an individual with a disability in order to help with communications, personal care or medical needs, or with access to services

### **Multi-year Accessibility Plan**

WFS has prepared and will maintain a Multi-Year Accessibility Plan, which outlines the phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. The Company will post the Multi-Year Accessibility Plan, internally on the Company's shared drive and/or intranet, externally on the Company's website, and provide the information in an accessible format upon request.

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five (5) years.

### **Customer Service Standards**

Reasonable efforts have been made by WFS, including its team members, volunteers, and individuals providing services on their behalf, to ensure that:

- Persons with disabilities are provided equal opportunity to obtain, use, and benefit from WFS' services;
- WFS' services are provided in a manner that respects the dignity and independence of persons with disabilities;
- Services provided to persons with disabilities are integrated with the provision to others unless an alternative measure is necessary to allow a person with a disability to benefit; the alternative measure may be temporary or permanent;
- Communications with a person with a disability are conducted in a respectful manner that takes the person's disability into account;
- Persons with disabilities may use assistive devices, service animals and support persons as is necessary to access WFS' offices and services unless superseded by other legislation.

### **Assistive Devices**

We are committed to serving people with disabilities who use assistive devices to obtain, use, or benefit from our services. We will ensure that all team members, volunteers, and others dealing with the public are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our services.

All team members, volunteers, and others dealing with the public will know how to use the following assistive devices available on our premises for customers.

#### **a) Telephone Services**

We are committed to providing fully accessible telephone service to our customers. We will train team members to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

All team members, volunteers, and others dealing with the public will offer to communicate with customers by web-based customer care request, e-mail, or fax if telephone communication is not suitable to their communication needs or is not available.

#### **b) Orders and Billing**

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, e-mail, fax, and web-based access.

All team members, volunteers, and others dealing with the public will answer any questions that customers may have about the content of the invoice in person, by telephone, or email.

**c) Service Animals**

We are committed to welcoming people with disabilities who are accompanied by a service animal on parts of our premises that are open to the public and other third parties. All team members, volunteers, and others dealing with the public will be properly trained in how to interact with people with disabilities who are accompanied by a service animal.

**d) Support Persons**

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the Company's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

**e) Notice of Temporary Service Disruption**

WFS will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed in conspicuous places, including entrances and service counters of the affected premises, as well as by other means such as on our website that will ensure that the notice reaches those persons potentially affected by the temporary disruption.

**f) Feedback System**

WFS' goal is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services, goods, and facilities regarding how well those expectations are being met are welcome and appreciated. People interested in providing feedback on the way we provide goods, services, and facilities to people with disabilities at WFS are to complete and submit the AODA Accessible Customer Service Feedback Form. Feedback regarding the way WFS provides services to people with disabilities may be submitted verbally in person, by phone, by mail, by fax, or online. Upon receipt of any complaints, the Director, Operations will investigate the matter with the appropriate personnel and provide a response within ten (10) days. Upon request, accessible formats and communication supports are available when receiving and responding to feedback.

**Information and Communications****Communication**

WFS is committed to meeting the communication needs of people with disabilities. We shall notify the public and our team members of the availability of accessible formats and communication supports when requested. Upon request and in consultation with the person making the request, we shall provide, in a timely manner, accessible formats and communication supports for information and communication that takes into account the person's disability. This includes publicly available information about our goods, services and facilities, emergency information, and feedback processes. Where information or communications cannot be provided in an accessible format or with communication supports, for example, if it is not technically feasible, WFS will provide an explanation as to why the information or communication cannot be provided in an accessible format. Documentation outlining the feedback process is available upon request.

**Accessible Websites and Web Content**

Internet websites and web content controlled directly by the Company or through a contractual relationship that allows for modification of the site will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA In accordance with the schedule set out in the IASR.

**Emergency Procedures, Plans and Information**

WFS will provide, upon request, all existing public emergency procedures, plans, and public safety information in an accessible format or with appropriate communication supports in a timely manner upon request.

## Training

### Customer Service Standard

WFS provides training on the Customer Service Standard requirements under the AODA to all team members, volunteers, and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices, and procedures. Team members will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. Team members will also be trained on an on-going basis when changes are made to these policies, practices, and procedures.

### Integrated Accessibility Standard

WFS is committed to training team members, volunteers, persons who deal with the public or other third parties on their behalf and other persons involved in developing policies on Ontario's accessibility laws and on accessibility aspects of the Ontario Human Rights Code that apply to persons with disabilities. Training will be provided in a way that best suits the duties of team members, volunteers, and other staff members, and will be on-going where there are any changes to these policies. Training will take place as soon as is practicable and upon completion, records of training will be kept and will be available for inspection as may be required.

## Employment Standards

### Recruitment

WFS shall post information about the availability of accommodation for job applicants with disabilities in the 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. When the applicant requests accommodation, WFS shall consult with the applicant to arrange for accommodation in a manner that takes into account the applicant's disability.

### Employee Supports

WFS shall inform its team members of the policies used to support team members with disabilities, including accommodation policies that take into account a team member's accessibility needs. This information will be provided to new team members as soon as practicable after they begin their employment and updated information will be provided to all team members whenever there is a change to existing accommodation policies.

### Accessible Formats and Communication Supports for Team Members

Upon a team member's request, WFS will consult with the team member to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the team member's job; and
- Information that is generally available to team members in the workplace.

WFS will consult with the team member making the request in determining the suitability of the accessible format or communication supports.

### Workplace Emergency Response Information

Individual workplace emergency response procedures shall be provided to a team member with a disability where it is necessary. In addition, this information shall be provided, with the team member's consent, to the person designated to provide assistance. The information will be reviewed whenever the team member moves to a different location, when the team member's overall accommodation needs or plans are reviewed, and when WFS reviews its emergency response plans.

### **Documented Individual Accommodation Plans**

A written process for the development and maintenance of documented individual accommodation plans shall be developed for team members with disabilities. Upon request, these plans will include information regarding accessible formats and communication supports and individualized workplace emergency response information.

### **Return to Work Process**

The Company shall have in place a documented return to work process for team members returning to work due to disability and requiring disability-related accommodations. The return to work process outlines the steps the Company will take to facilitate the return to work.

### **Performance Management and Career Development and Redeployment**

WFS shall take into account the accessibility needs of its team members with disabilities when providing career development, performance management, and when considering redeployment.

### **Design of Public Spaces**

WFS will meet the Accessibility Standards for the Design of Public Spaces when undertaking new construction and redevelopment of public spaces.

Public spaces include:

- Recreational trails and beach access routes
- Outdoor public eating areas (e.g. rest stops or picnic areas)
- Outdoor play spaces
- Outdoor paths of travel (e.g. sidewalks, ramps, stairs)
- Accessible parking
- Service-related elements (e.g. service counters, fixed queuing lines and waiting areas)

### **Modifications to this Policy**

WFS will strive to avoid any corporate policies that do not respect and promote the dignity and independence of people with disabilities. Our policies are maintained and updated regularly to reflect legislative changes and changes in our practices. As we are committed to developing accessibility policies that respect and promote the dignity and independence of people with disabilities, no changes will be made to this policy before considering the impact on people with disabilities.

### **Further Information**

If anyone has a question about these Accessibility Policies, please contact:

Natasha Barran – Senior Human Resources Manager

Email: [nbarran@wfsltd.com](mailto:nbarran@wfsltd.com)

Phone: (905) 762-3191

A copy of these Accessibility Policies is available upon request by contacting Natasha Barran, Senior Human Resources Manager.