

WFS' Multi-Year Accessibility Plan

WFS Ltd. ("WFS" or 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 *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA"). 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.

This 2014-2021 Multi-Year Accessibility Plan outlines the strategy of WFS to prevent and remove barriers to address the current and future requirements of the AODA, and to fulfill WFS' commitment as outlined in the WFS Accessibility Policies.

In accordance with the requirements set out in the IASR, WFS will:

- Post the Multi-Year Accessibility Plan on the company website;
- Provide the Multi-Year Accessibility Plan in an accessible format, upon request; and
- Review and update the Multi-Year Accessibility Plan at least once every five (5) years.

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 that facilitate 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

Customer Service Standards

Commitment:

Since 2012, WFS has been in compliance with the *Accessibility Standards for Customer Service*, Regulation 429/07 under the AODA. WFS is committed to excellence in serving all customers, including persons with disabilities, and will provide goods, services and facilities in a way that is accessible and respects the dignity and independence of persons with disabilities.

Action Taken effective January 1, 2012:

- All team members, volunteers and others dealing with the public, on behalf of WFS, are trained on an on-going basis to communicate with persons with disabilities. Training has included the following:
 - Review of the purpose of the AODA and the requirements of the Customer Service Standard;
 - How to interact and communicate with people with various types of disabilities;
 - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
 - How to use the alternative means to help provide goods or services to people with disabilities;
 - What to do if a person with a disability is having difficulty in accessing the Company's goods and services; and
 - The Company's policies, practices and procedures relating to the Customer Service Standard.
- All team members, volunteers and others dealing with the public, on behalf of WFS, are trained and are familiar with various assistive devices that may be used by customers with disabilities while accessing our services.
- WFS provides fully-accessible telephone service to customers and communication with customers by TTY if telephone communication is not suitable to their needs.
- The Company ensures accommodation to customers serviced by a guide dog or other service animal in public areas.
- Where a person with a disability is accompanied by a support person, the support person is accommodated.
- Customers are notified in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities by placing standard notices of temporary disruption at all public entrances and service counters on WFS premises.
- Feedback is encouraged from persons with disabilities through multiple accessible ways, including online through the AODA Accessible Customer Service Feedback Form on the company website, in person, via telephone, via fax, or by mail. Upon request, accessible formats and communication supports are available when receiving and responding to feedback. Any feedback from customers will be documented in the Record of Customer Feedback.
- WFS communicates its Summary of Accessible Customer Service Policy on the Company website and/or provides the policy upon request.

Status: Complete

Emergency Procedure, Plans or Public Safety Information

Commitment:

WFS is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

Action Taken effective January 1, 2012:

- Any emergency procedures, plans and public safety information that are prepared by WFS and made available to the public, will be available in accessible formats or with communication supports, upon request.
- Requests can be made to the Senior Human Resources Manager for such procedures, if applicable, and requests will be documented by the Company.

Status: Complete

Workplace Emergency Response Information

Commitment:

WFS is committed to providing individualized workplace emergency response information to a team member with a disability requiring accommodation.

Action Taken effective January 1, 2012:

- Individualized workplace emergency response information procedures are developed for team members with disabilities, as required.
- Workplace Emergency Response Information Forms are prepared for team members who have disclosed a disability and who are being accommodated according to their disabilities.
- WFS provides assistance to specific disabled team members, with consent, to help them evacuate the workplace during an emergency.
- Workplace Emergency Response Information forms are only communicated to the team members' leaders and other affected persons, on an as-needed basis.
- WFS reviews and assesses general workplace emergency response procedures and individualized emergency plans on an on-going basis.
- Managers and the Senior Human Resources Manager will ensure that the individual workplace response information is updated as necessary.

Status: Complete

Training

Commitment:

WFS is committed to training team members, volunteers, and others dealing with the public on behalf of WFS.

Action Taken effective January 1, 2015:

- In addition to training on the Customer Service Standards, appropriate training on the requirements of the IASR and on the Ontario *Human Rights Code*, as it pertains to persons with disabilities, is provided to team members, volunteers, and others dealing with the public on behalf of WFS.
- Training will be completed as soon as practicable to new and current team members and training records will be kept with Human Resources.
- Training will be provided on an ongoing basis when there are any changes to legislation or practices.

Status: Complete

Information and Communications Standards

Commitment:

WFS is committed to making information and communications accessible to persons with disabilities. The Company will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

Action Taken effective January 1, 2015:

- Upon request, accessible formats and communication supports will be provided or arranged in a timely manner that accounts for the person's needs due to disability and at a cost no more than the regular cost charged to other persons.
- WFS Branch Managers will consult with the person making a request to determine the suitability of the accessible format or communication supports.
- The public will be notified through the Company website about the availability of accessible formats and communication supports.
- WFS will ensure current and new processes for receiving and responding to feedback are accessible to persons with disabilities.

Status: Complete

2. Accessible Websites and Web Content

Action Taken effective January 1, 2014:

- WFS ensures that the Company website and web content conforms to the World Wide Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.

Status: Complete

Action Taken effective January 1, 2021:

- WFS' Internet website and web content conforms to the World Wide Web Content Accessibility Guidelines (WCAG) 2.0, Level AA.

Status: Complete

Employment Standards

Commitment:

WFS is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective team members with disabilities.

1. Recruitment, Assessment, and Selection

Action Taken effective January 1, 2016:

- The Company conducted a review and, as necessary, modified existing recruitment policies, procedures and processes to ensure fair and accessible recruitment processes.
- WFS notifies its team members, as well as the public, about the availability of accommodation for job applicants with disabilities during the recruitment process. Notification will be provided in an accessible manner, if necessary.
- The availability of accommodation during the recruitment process is indicated on the Company website and job postings.
- Job applicants who are individually selected to participate in an assessment or selection process are notified of available accommodation upon request. The availability of accommodation is communicated through a script in scheduling interviews and/or assessments. Notification will be provided in an accessible manner, if necessary.
- If a selected applicant requests accommodation, the hiring managers and Human Resources will consult with the applicant and arrange for suitable accommodation in a manner that takes into account the accessibility needs.
- All successful applicants are notified through their offer letter of the workplace policies for accommodating employees with disabilities, and notification will be provided in an accessible manner, if necessary.

Status: Complete

2. Informing Team Members of Supports

Action Taken effective January 1, 2016:

- WFS informs all current and new team members of workplace policies that support team members with disabilities, including accommodation policies that take into account needs due to disability.
- New team members will be informed of workplace policies that support team members with disabilities as soon as practicable through their offer letters. Policies and forms may be found on the Company's shard drive and/or intranet.
- WFS informs team members of changes to existing workplace policies with respect to accommodating disability via e-mail. Policies and forms may be found on the Company's shard drive and/or intranet.
- Upon request to leaders, WFS will provide or arrange for suitable accessible formats and communication supports for information needed to perform the team member's job, and general team member information. In order to provide suitable accessible formats or communication supports, managers and Human Resources will consult the requesting team member.

Status: Complete

3. Documented Individual Accommodation Plans and Return to Work Processes

Action Taken effective January 1, 2016:

- WFS' existing policies include steps that the Company will take to accommodate a team member with a disability and to facilitate a team member's return to work after absenteeism due to disability.
- WFS will develop written Individual Accommodation Plans for team members with disabilities, if necessary, with leaders and Human Resources.
- Human Resources has developed the written process for creating Individual Accommodation Plans for team members with a disability requiring accommodation, and it is in accordance with the IASR.
- Current policies on accommodation have been reviewed and modified to integrate the process for developing written Individual Accommodation Plans for team members with a disability, if necessary.
- If applicable, individual accommodation plans will include information regarding accessible formats and communication supports, individualized workplace emergency response information, and/or other accommodation.
- Leaders and Human Resources will ensure that Individual Accommodation Plans are updated as necessary.
- Human Resources has developed the written process for creating Return to Work plans for team members absent due to disability and requiring accommodation, and it is in accordance with the IASR.
- The written Return to Work process outlines the steps WFS will take to facilitate the return to work after a disability-related absence.
- Current policies on returning to work have been reviewed and modified to integrate the written Return to Work process.

Status: Complete

4. Performance Management, Career Development and Redeployment

Action Taken effective January 1, 2016:

- WFS has reviewed existing policies, procedures and practices on performance management, career development and redeployment to ensure compliance with the IASR.
- The Company will consider the accessibility needs of team members with disabilities, and as applicable, their Individual Accommodation Plans, when assessing performance management, career development and advancement, and redeployment.
- Leaders who conduct performance management meetings, career development and advancement meetings, and make redeployment decisions will be trained on accounting for accessibility needs.

Status: Complete

Accessibility Standards for the Built Environment

Commitment:

WFS is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

Action Taken effective January 1, 2017:

- WFS will ensure that any of the following public spaces that are newly constructed or redeveloped will meet the accessibility requirements under the IASR:
 - ❖ 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)

Status: Complete

FURTHER INFORMATION

If anyone has a question about the Multi-Year Accessibility Plan, please contact:

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A copy of the Multi-Year Accessibility Plan is available upon request by contacting Natasha Barran, Senior Human Resources Manager.