

Ontario Accessibility Policy

1. Objectives and Scope

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) develops, implements and enforces accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures and premises are accessible to persons with disabilities.

This policy and 2014-2021 accessibility plan applies to all TC Transcontinental employees in Ontario and outlines the policies and actions that will be put into place to improve opportunities for people with disabilities.

2. Statement of Commitment

TC Transcontinental is committed to the principles of independence, dignity, integration and equality of opportunity described in the AODA and to meeting the needs of people with disabilities in a timely manner through the implementation of this policy.

3. Definitions, Abbreviations and Acronyms

Terms	Definitions
Corporation	Transcontinental Inc. and its subsidiaries in Ontario
Accessible formats	may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats used by persons with disabilities.
Accommodation	means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.
Communication	supports may include, but are not limited to, captioning, plain language, sign language and other supports that facilitate effective communications.
Communications	means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.
Information	includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.

Roles and Responsibilities

Roles	Responsibilities
Human Resources Director, Ontario	Maintain, review, update, file and support the regulations under the legislation.
Human Resources Representative, Ontario	Ensure that this policy is applied, and that reporting, training and implementation of standards are met.
Business Unit Managers, Ontario	Ensure that this policy is applied within the business unit under their direction.
Communications Department	Implement and maintain the necessary information standards as outlined in the legislation for all public communication, websites and information requested by the public.

4. Principles

TC Transcontinental endeavors to ensure that the Policy and related practices and procedures are consistent with the following four (4) core principles:

- 4.1 Dignity** - Persons with a disability must be treated as valued employees and customers and as deserving of service as any other person.
- 4.2 Equality of Opportunity** - Persons with a disability should be given an opportunity equal to that given to others for employment and to obtain, use and benefit from our goods and services.
- 4.3 Integration** - Wherever possible, persons with a disability should benefit from our goods, services or employment in the same place and in the same or similar manner as any other person. In circumstances where integration does not serve the needs of the person with a disability, we will, to the extent possible, provide support in another way that takes into account the person's individual needs.
- 4.4 Independence** - Individuals will be provided employment/goods/services in a way that respects the independence of persons with a disability. To this end, we will always be willing to assist a person with a disability, but will not do so without the express permission of the person.

5. Regulation Requirements

The legislation requires the following from TC Transcontinental in Ontario:

- The establishment, implementation, maintenance and documentation of a multi-year accessibility plan that outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Advise potential new hires and employees of our accessibility policies and how to receive accessible information.

- Ensure policies, including accommodation plans, return to work policies, performance management and career development, support the principles and meet the requirements of the Integrated Accessibility Standards Regulations.
- Provide information to customers in an accessible format and train employees interacting with customers on our policies and accessibility options.
- Develop policies and procedures that ensure the safety of employees with disabilities during an emergency.
- Ensure that our communications with the public, such as websites and feedback to and from the public, is accessible.

6. Legislative Requirements

General Requirements

Multi-Year Accessibility Plan

The Corporation's Multi-Year Accessibility Plan (Plan) outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA. The high-level plan is posted on the website and will be provided in alternative formats upon request.

The Plan will be reviewed and updated at least once every five years and will be in place by January 1, 2014.

Training

The Corporation will ensure that training is provided to all employees dealing with customers on the requirements of the accessibility standards referred to in Customer Service Standards.

The Corporation will provide to all employees by January 1, 2015, training on the requirements of the AODA, our accessibility policies, Human Rights Code, accommodation policies and information as to where further information may be accessed, if required. Any training provided will be appropriate to the recipients' duties. It will be provided as soon as is practical. Further training will be provided on material changes that may be made to this policy or the requirements.

The Corporation will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

Requirements Under Information and Communication Standards

Accessible Websites and Web Content

The Corporation's Internet and Intranet websites and the web content on those sites will conform to Level AA of version 2 of the Web Content Accessibility Guidelines as required by January 1, 2021.

Accessible Formats and Communication Supports

By January 1, 2016, the Corporation will, upon request, make available public information in a format that meets the needs of the individual. The Corporation will do this in a timely manner through consultation with the individual as to a suitable format.

Accessible Emergency Information

The Corporation is committed to providing customers with publicly available emergency information in an accessible way upon request. We will also work directly with individual

employees with a disability, who require support during an emergency, to develop and maintain an emergency response plan based on their needs.

Requirements Under Information and Employment Standards

Recruitment

By January 1, 2016, the Corporation will have developed new or amended existing recruitment policies and procedures to ensure the following:

- The Corporation notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.
- The Corporation notifies job applicants whom it contacts for an interview or testing that they can request accommodations with respect to the materials or processes used. If the applicant requests an accommodation, the Corporation consults with him or her as to what a suitable accommodation would be.
- The Corporation informs individuals to whom it offers employment of its policies for accommodating employees with disabilities.

Informing Employees of Supports and Providing in Accessible Formats

By January 1, 2016, the Corporation will review all existing policies on supporting employees with disabilities to ensure that sufficient support is provided. The corporation will also inform employees about these policies and ensure that:

- Policies on job accommodations take into account the employee's accessibility needs.
- New employees are informed of these policies as soon as it is practical after they begin their employment.
- It informs all employees of changes to existing policies or requirements.
- Workplace information required to perform their job and general information available to all employees is provided in an accessible format. The corporation will work with the individual employees to determine a suitable format to meet their needs

Workplace Emergency Response Information

If the Corporation is aware of an employee's need for accommodation due to disability, and if the disability makes it necessary for the employee to have individualized workplace emergency response information, the Corporation will ensure that:

- It provides information to individuals who require it and that it does so as soon as is practical once it becomes aware of the need for accommodation.
- If the employee requires assistance and provides consent, the Corporation will provide the information to a person it designates to assist the employee.
- The Corporation will review the information when the employee's overall accommodation needs or plan are established and when it reviews its overall emergency response policies.

Documented Individualized Plans

By January 1, 2016, the Corporation will have developed new or amend existing human resource policies and procedures to ensure the following:

- The Corporation provides an individualized accommodation plan in writing for any employee with a disability.
- The Corporation provides an individualized return-to-work plan in writing for any employee who has been absent from work due to a disability and requires disability-related accommodations to return to work.

Return to Work Programs

By January 1, 2016, the Corporation will ensure that we have individualized return to work plans for anyone absent due to a disability. The Corporation will also ensure that it has a documented process that outlines the steps it will take to help employees return to work.

Performance Assessment, Career Development and Advancement, and Redeployment

By January 1, 2016, the Corporation will ensure that its HR policies and procedures take into account the accessibility needs of employees with disabilities and their individual accommodation plans when assessing their performance, in managing their career development and advancement and when redeploying them.

Notes:

1. *Customer Service Standard Requirements are defined in Accessibility Standards for Customer Service Policy*
2. *Design for Public Space requirements do not apply to TC Transcontinental*
3. *Transportation requirements do not apply to TC Transcontinental*