

Ontario Accessibility Policy

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Version 1	2013-12-24	New
Version 2	2017-01-05	Review and revised
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Ontario Accessibility Policy

1. Objectives and Scope

The *Accessibility for Ontarians with Disabilities Act, 2005* and the Integrated Accessibility Standards Regulation (the "**AODA**") establish and enforce accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures and premises are accessible to persons with disabilities.

This Policy applies to all TC Transcontinental (the "**Company**") employees, agents and contractors 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;
- meeting the objectives and requirements of the AODA; and
- meeting the needs of people with disabilities in a timely manner

through the implementation of the requirements established by the AODA.

3. Purpose

The purpose of this Policy is to act as a guide in establishing the requirements and responsibilities for all employees who have interactions with employees, job candidates, clients, contractors, and vendors, to ensure all services provided are in a manner that takes into account a person's disability. The guidelines outlined in this document represent acceptable service practices for TC Transcontinental. All employees are encouraged to take personal initiative in following the procedures outlined in this document and to continually contribute to a high level of exceptional customer service.

4. Definitions, Abbreviations and Acronyms

For the purpose of this Policy, the following terms will apply:

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 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.

AODA: The *Accessibility for Ontarians with Disabilities Act, 2005* was created with the goal of developing standards that would improve accessibility for people with disabilities across the Province.

Assistive Devices: A technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities.

Barrier: Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy

or practice.

Disability:

- 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 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.

IASR: The Integrated Accessibility Standards Regulation (the “IASR”) is a regulation under the AODA that establishes the accessibility standards and compliance timeframes with respect to a variety of domains, including information and communication, employment, transportation, and the design of public spaces. The requirements in the standards set out in the IASR are not a replacement or substitution for the requirements established under the Ontario *Human Rights Code*.

Information: Includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.

JHSC: The Joint Health and Safety Committee (“JHSC”) brings representatives of the employer and workers together to discuss and address health and safety related concerns in the workplace. At TC Transcontinental, the JHSC participates in the creation and review of all health & safety related standards, procedures, policies, protocols, etc.

Service Animal: An animal is a service animal for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to their disability; or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to their disability.

Support Person: A support person means, in relation to a person with a disability, another person who accompanies the individual in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

5. Roles and Responsibilities

Human Resources Senior Leaders HR Senior Leader shall:

- a. Maintain, review, update, file and support the regulations under the legislation.
- b. Encourage the consistent application of this Policy to eliminate barriers.

Senior Management

Senior Management shall:

- c. Plan for the necessary accommodations to ensure customer service standards are maintained and compliance achieved, through the provision of financial support and other support as required.
- d. Encourage the consistent application of this Policy to eliminate barriers.

Supervisors and Managers

Supervisors and Managers shall:

- a. Ensure that elements of this Policy are being followed.
- b. Ensure that each worker under their supervision is delivering an accessible and exceptional level of customer service in their dealings with any staff or external persons with disabilities and providing service in a manner that is consistent with principles of independence, dignity, integration and equality.
- c. Be aware of and incorporate this Policy into employee recruitment, assessment, selection and performance management practices.
- d. Participate in identifying and removing barriers.
- e. Initiate corrective action for violations of this Policy.

Information Technology Department

The Information Technology Department shall:

- a. Ensure that TC Transcontinental's website and content complies with section 14 of the IASR relating to the World Wide Web Consortium Web Content Accessibility Guidelines at Level AA.
- b. Work collaboratively with the Corporate Communications team to find technology to accommodate accessibility needs as required.

Human Resources Department

The Human Resources Department shall:

- a. Ensure that the requirements of this Policy are implemented and remain current with the applicable legislative requirements.
- b. Maintain all documentation associated with this Policy.
- c. Assist in providing accommodations as required upon request.
- d. Prepare and submit annual reports as required under current Provincial requirements.
- e. Prepare and deliver training as required under this Policy.

Employees

Employees shall:

- a. Follow the requirements of this Policy.
- b. Obtain any accommodation needs from contacts prior to them coming to TC Transcontinental's premises, and notify the Human Resources Department of the accommodations required so necessary arrangements can be made.
- c. Participate in training initiatives that support this Policy as required.
- d. Notify Supervisor or Manager of any issues identified or needs for accommodation.

6. Principles

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

Dignity - Persons with a disability must be treated as valued employees and customers and as deserving of service as any other person.

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.

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.

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.

7. Employment Procedures

7.1 Recruitment, assessment & selection TC Transcontinental will specify that accommodation is available for applicants with disabilities in its recruitment processes on our website and in our job postings. Additionally, TC Transcontinental will inform internal and external job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Company will consult with the applicant and provide or arrange for the provision of a suitable accommodation, having regard for the applicant's accessibility needs. When making an offer of employment, TC Transcontinental will notify the successful applicant of the policies for accommodating workers with disabilities at the time of the offer and as soon as practicable after the new employee begins work (specifically, during orientation).

7.2 Performance management, career development and advancement, and redeployment

TC Transcontinental shall take into account the accessibility needs of employees with disabilities and Individual Accommodation Plans ("IAP") in its performance management processes, when providing career development and advancement opportunities, and when redeploying employees with disabilities.

7.3 Employee supports

7.3.1 Informing Employees of Supports:

TC Transcontinental informs staff of policies used to support employees with disabilities including policies on the provision of job accommodation that takes into account the employee's accessibility needs. The information will be provided to new employees during their orientation period and any updated information shall be provided to all staff whenever there is a change to existing policies on the provision of job accommodations.

7.3.2 Accessible Formats and Communication Supports for Employees:

When requested by an employee, TC Transcontinental will consult with the worker 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 and also for information generally available to employees in the workplace. TC Transcontinental will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Emergency procedures, plans or public safety information that is publicly available shall be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

8. Individualized workplace emergency response information:

- a. TC Transcontinental will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and TC Transcontinental is aware of the need for accommodation due to the disability.
- b. If an employee who receives individualized workplace emergency response

information requires assistance and with the employee's consent, TC Transcontinental will provide the workplace emergency response information to the person designated by TC Transcontinental to provide assistance to the employee.

- c. Individualized workplace emergency response information will be reviewed when an employee moves to a different location within the organization, when the employee's overall accommodation needs or plans are reviewed/revise, and when TC Transcontinental reviews its general emergency response protocols.

9. Documented individual accommodation plans & work reintegration

9.1 Individual Accommodation Plans:

- a. TC Transcontinental shall maintain a written process for developing IAPs for employees with disabilities in accordance with IASR which shall include:
 - The manner in which an employee requesting accommodation can participate in the development of the IAP.
 - The means by which the employee is assessed on an individual basis.
 - The manner in which TC Transcontinental can request an evaluation by an outside medical or other expert, at the Company's expense, to assist in determining if accommodation can be achieved and, if so, how to achieve accommodation.
 - The manner in which the employee can request the participation of a support person in the development of the accommodation plan.
 - The steps taken to ensure the privacy of the employee's personal information.
 - The frequency with which the IAP will be reviewed and updated.
 - If an IAP is denied, the manner in which the reasons for the denial will be provided to the employee.
 - The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- b. IAPs shall, if requested, include any information regarding accessible formats and communication supports provided, individual workplace emergency response information, and shall identify any other accommodation that is to be provided.

- 9.2** TC Transcontinental has a written Return to Work program that is designed for employees who have been absent from work due to a medical injury/illness/disability and require accommodation to return to work. The process for integrating employees back to work includes steps that the Company shall take to facilitate the return to work of employees and uses documented IAPs as described above.

10. Design of public spaces

The Accessibility Standards for the built environment focus on removing barriers in public spaces and buildings. TC Transcontinental shall incorporate accessibility into public spaces that are newly constructed or redeveloped where practicable on and after January 1, 2017. Public spaces include exterior paths of travel, parking, service counters, waiting areas, and the maintenance of accessible parts of public spaces such as outdoor public eating areas, if applicable.

11. Multi-year accessibility plan & reports

- 11.1** The Company shall conduct an assessment (gap analysis) of where the Company is now and where it needs to be in order to comply with the AODA. It will then establish, implement, maintain and document a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the IASR.

- 11.2** The Accessibility Plan shall outline the short- and long-term requirements that need

- to be met along with how the Company will accomplish the following:
- meet the accessibility requirements within the required timelines;
 - address current accessibility barriers; and
 - prevent and remove future barriers.

11.3 The Multi-Year Accessibility Plan shall be posted publicly on the Company website and shall be reviewed and updated at least once every five (5) years in accordance with the requirements of the governing regulation. TC Transcontinental shall file an Accessibility Report with the Province at all times required by legislation. Accessibility reports shall be made publicly available.

12. Providing goods and services to people with disabilities

12.1 In accordance with the Accessibility Standards for Customer Service under the IASR, the Company shall maintain the following:

- a. **Communication:** Employees of the Company will communicate with people with disabilities in ways that take into account their disability. TC Transcontinental employees who interact with external persons will receive training on how to interact and communicate with people with various types of disabilities.
- b. **Telephone Services:** TC Transcontinental is committed to providing fully accessible telephone services to our customers. We will train employees to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly, ensuring a person's disability is taken into account. We will offer to communicate with customers by email if telephone communication is not suitable to their communication needs or is not available.
- c. **Assistive Devices:** The Company will work with individuals with assistive devices to obtain, use or benefit from our goods and services. We will ensure that our employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services. Employees are expected to provide accommodations that meet the needs of the individual.
- d. **Support Persons:** TC Transcontinental will continue to welcome 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 TC Transcontinental's premises with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises. All persons entering TC Transcontinental's premises must be accompanied by a TC Transcontinental employee, in accordance with our visitor's policy.
- e. **Service Animals:** Persons with disabilities may be accompanied by a service animal in the areas of our premises that are open to the public. This excludes designated/regulated areas. We will also ensure that all employees who interact with external persons are properly trained in how to interact with people with disabilities who are accompanied by a service animal. We will also ensure that employees are properly trained in how to interact with the service animal. Under no circumstances should employees interact with the service animal without prior consent from the individual in charge of or having ownership of the service animal. Service animals must be supervised by their owners and always kept in control while on TC Transcontinental property.
- f. **Notice of Temporary Disruption:** In the event of a planned disruption to facilities and services, employees should advise any external contacts with disabilities to notify them in advance of the disruption by the most

appropriate means. In the event of an unexpected disruption, notice shall be provided to the public as soon as possible to prevent any hardships. The notice shall include information about the reason for the disruption, the anticipated duration and a description of alternate services that maybe available.

- g. **Feedback Process:** The ultimate goal of TC Transcontinental is to meet and surpass customer expectations while serving persons with disabilities, ensuring the processes are accessible to persons with disabilities or arranging for the provision of accessible formats and communication supports as soon as practicable upon request. We welcome and appreciate all comments regarding how well those expectations are being met as well as on our feedback processes themselves. Feedback can be made verbally in person, by telephone, through mail or email. Feedback that is received must be forwarded to the applicable VP of Human Resources the day it is received so that any follow up that is required can be completed in a timely manner. Such feedback will be addressed according to TC Transcontinental's regular complaint management procedures. All feedback will be reviewed and appropriate action will be taken to address any complaints as soon as practicable. TC Transcontinental's feedback process can be provided in an accessible format or with communications supports upon request. Each operating unit within Ontario is to maintain their own respective feedback process along with the TC Corporate feedback process.
- h. **Accessible Website(s):** TC Transcontinental takes into consideration the variety of ways that people with disabilities navigate the web and understand web content and therefore shall strive to maintain an accessible website and subsequent micro-sites in accordance with legislative requirements. TC Transcontinental endeavours to ensure our website and micro-sites are usable by as wide an audience as possible as part of our commitment to excellent customer service. The Company shall assess our site to identify and remove barriers and implement improvements to account for accessibility best practices including but not limited to:
- Writing web content in clear language
 - Providing alternative text for images
 - Making sure someone can navigate our website and micro-sites using just a keyboard
 - TC Transcontinental shall make its internet website and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 to the extent practicable.
- i. **Availability of Documents:** All published documents of TC Transcontinental can be made available in hard copy, large print or email if required, upon request. If the Company is required to provide documents to a person with a disability the document or the information contained in the document will be provided in a format that takes into account, the person's disability. Reasonable efforts will be made to respond to requests for documents in alternate formats in a timely manner.

13. Communication

13.1 The Company shall make this Policy and its Accessibility Plan publicly available (for example at Reception) and shall provide them in an accessible format upon request. Filing of Accessibility Reports shall be completed as required by the AODA..

13.2 This Policy will be communicated to affected employees and the JHSC through the most appropriate means for the audience which may include, but are not limited to, options such as: Employee or JHSC Meetings, New Hire Orientation, Email, TV,

Newsletter, Memo, Safety Talk, Department Meeting, or by any other means as deemed appropriate. This Policy will be available on the Company's Intranet for quick access and reference by staff.

14. Training

TC Transcontinental will provide training to applicable employees, volunteers, and other staff on the requirements of the accessibility standards in the IASR and in compliance with the Ontario *Human Rights Code* as it relates to persons with disabilities. Training sessions or refresher training sessions on recommended customer service practices will be held to ensure expected standards are communicated to all affected parties. Training will be provided as soon as practicable during onboarding or during refresher sessions as needed to reflect updates and amendments to changes in legislation or to this Policy. Records of training will be maintained by the Company for each participant. Training topics shall include but not be limited to:

- Review of the purposes of the AODA and the requirements of the IASR;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device, service animal or support person;
- How to use equipment or devices available on the Company's premises or otherwise provided by TC Transcontinental that may help with the provision of goods, services or facilities to a person with a disability;
- What action to take if a person with a particular type of disability is having difficulty accessing goods or services; and
- Instruction on TC Transcontinental's customer service policies, practices and procedures governing the provision of goods or services to people with disabilities.

Training on this Policy will be delivered to affected staff through the most appropriate means for the audience, which may include, but is not limited to, options such as: Worker/Supervisor Training sessions, Employee or JHSC Meetings, New Hire Orientation, self-directed learning initiatives, or by any other means deemed appropriate. Records of training completion on this Policy may take the form of a Record of Training (ROT), completion of a test, supplying a certificate, or by any other means deemed appropriate.

15. Evaluation

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

This Policy shall be reviewed at least once every five (5) years by the Company and reviewed or amended as required when additional accessibility related regulations are enacted by the provincial government. Evaluation for compliance with this Policy may include options such as: a review of applicable legislation or organizational data, a review of training and communication records, an employee survey to gauge knowledge and understanding of this Policy, or any other means deemed appropriate.

16. Acknowledge success & make improvements

Improvements to this Policy will be made when deficiencies or opportunities for improvement are identified or when amendments to legislation are introduced or recommended. This Policy will be deemed successful when the Company achieves compliance with current legislative requirements and/or when positive feedback is received on the Company's ability to accommodate persons with disabilities. Success will be formally acknowledged using a minimum of one (1) of the following means: Employee Meetings, Newsletter, Memo, TV, or any other means as deemed appropriate.

17. Forms

- Multi-Year Accessibility Plan
- *Individual Accommodation Plan (IAP)*

18. Reference Documents

- Ontarians with Disabilities Act, 2001
- Accessibility for Ontarians with Disabilities Act, 2005
- Ontario Regulation 191/11 – Integrated Accessibility Standards
- Ontario Regulation 429/07 – Accessibility Standards for Customer Service
- Ontario Human Rights Code
- Workplace Safety and Insurance Act, 1997
- World Wide Web Consortium Web Content Accessibility Guidelines at Level AA
- Emergency Response Policy
- Return to Work Policy/Program
- Hiring & Equal Opportunity/Recruitment Policy
- Work Attendance Program



2024-2029
Multi Year Accessibility Plan
Ontario, Canada

COMMITMENT

The *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”) and the Integrated Accessibility Standards Regulation (the “**ASR**”) establish and enforce accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures and premises are accessible to persons with disabilities.

Transcontinental Inc. and its subsidiaries operating in Ontario, Canada, (the “**Companies**” or “**TC Transcontinental**”) are committed to fulfilling the requirements under the AODA and the IASR. This Multi-Year Accessibility Plan outlines the steps we are taking to meet those requirements and to improve opportunities for people with disabilities over a five-year period. It applies only to our operations in Ontario, Canada. The plan outlines the organization’s strategy to prevent and remove barriers and meet its requirements under the IASR.

TC Transcontinental is dedicated to fostering an inclusive and accessible environment. We are committed to taking the following steps to integrate accessibility considerations into our operations and ensure compliance with all legislative requirements:

- 1.1** TC Transcontinental will conduct an assessment (gap analysis) of where the applicable Company is now and where it needs to be to comply with the AODA. It will then establish, implement, maintain and document a Multi-Year Accessibility Plan which outlines the organization’s strategies to prevent and remove barriers and meet its requirements under the IASR.
- 1.2** The Multi-year Accessibility Plan shall outline the short- and long-term requirements that need to be met along with how the Companies will accomplish the following:
 - meet the accessibility requirements within the required timelines
 - address current accessibility barriers within each individual Ontario, Canada location by using the Individual Accessibility Plan (“IAP”) template; and
 - prevent and remove future barriers at each individual Ontario, Canada location.
- 1.3** The Multi-Year Accessibility Plan shall be posted publicly on TC Transcontinental’s website and shall be reviewed and updated at least once every five (5) years in accordance with the requirements of the IASR. TC Transcontinental shall file an Accessibility Report as required by legislation.

MULTI-YEAR ACCESSIBILITY PLAN DETAILS:

GENERAL INFORMATION
Ongoing initiatives in Ontario, Canada: <ul style="list-style-type: none"> - Adopt an updated Accessibility Policy and implement the Policy at all Ontario, Canada, locations. - Establish and implement a Multi-Year Accessibility plan. - Post the updated Accessibility Policy to TC Transcontinental’s internal website(s). - Provide Policy and Multi-Year Accessibility Plan in accessible format in all locations in Ontario, Canada. - Implement process to update Policy and Plan review every five years. - Ensure every location in Ontario, Canada is providing appropriate training on the <i>Human Rights Code</i>.
INFORMATION AND COMMUNICATIONS
Ongoing initiatives in Ontario, Canada: <ul style="list-style-type: none"> - Ensure clear feedback process is in place for every location. - Ensure feedback process is available in accessible formats. - Ensure all organization’s websites conform to World Wide Web Content Accessibility Guidelines 2.0 Level AA. - Ensure training is given to every new employee and include a portion on ‘how to interact/communicate with people with disabilities on site’ (visitors, vendors, etc.) - create a committee to develop the training content and put on Evolo.
CUSTOMER SERVICE
Ongoing initiatives in Ontario, Canada: <ul style="list-style-type: none"> - Audit training given at all Ontario, Canada, locations on providing goods and services to persons with disabilities to ensure it covers the following: <ul style="list-style-type: none"> • A review of the purposes of the AODA. • A review of the purposes of the Customer Service Standards.

<ul style="list-style-type: none"> • How to interact and communicate with persons with various types of disabilities. • How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person. • How to use equipment or devices available on the provider's premises or otherwise provided that may help with the provision of goods, services or facilities to a person with a disability. • What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities. <ul style="list-style-type: none"> - Implement process in case of temporary disruption (notice to the public).
WORKPLACE EMERGENCY RESPONSE
<ul style="list-style-type: none"> - Ensure all Ontario, Canada Business Units ("BUs") are provided with individualized workplace emergency response information to any person with disability and audit information provided, when required.
EMPLOYMENT
<ul style="list-style-type: none"> - Review and update existing recruitment policies procedures and processes for compliance, including specifying that accommodation is available for applicants with disabilities on both the website and on job postings.
DESIGN OF PUBLIC SPACES
<ul style="list-style-type: none"> - Continue to assess and make plans to improve the accessibility of Ontario, Canada offices and facilities for employees with disabilities by identifying and ensuring all public spaces are accessible, including: <ul style="list-style-type: none"> o Public outdoor paths of travel and parking lots; o Service counters/reception area; o Waiting areas with fixed seating and washrooms.

For More Information or Feedback:

Questions or comments about TC Transcontinental's accessibility plans, policies and practices are always welcome. Should you require a copy of the TC Transcontinental documents in standard or accessible format, please contact:

TC Transcontinental
 1 Place Ville Marie
 Suite 3240
 Montreal, QC H3B 0G1
 Attention: Human Resources Department
 Email: communications@tc.tc
 Phone: (514) 954-4000

Feedback, questions and requests will be responded to in the same manner they were received (by mail, email or telephone) in a timely manner.