

INTEGRATED ACCESSIBILITY STANDARDS POLICY

PURPOSE

Graywood Developments LP is committed to providing a barrier-free environment for all stakeholders, including our clients, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations. The requirements under the AODA are not a replacement or substitution for the *Ontario Human Rights Code* and work in conjunction with the Code. The purpose of this policy is to outline Graywood Developments responsibilities under the AODA and the Integrated Accessibility Standards Regulation.

POLICY

The Integrated Accessibility Standards Policy is designed to ensure that the firm is accessible to all employees, clients and visitors in a way that respects the dignity and independence of people with disabilities. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA.

DEFINITIONS

“Accessible formats” refers to formats that are alternative to standard print and are accessible to people with disabilities.

“Communication supports” refers to methods that assist communication and access to information for people with disabilities.

“Disability” as defined under the *Ontario Human Rights Code* is:

- 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 in a wheelchair or other remedial appliance or device;

- a condition of mental impairment or a developmental disability;
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder, or;
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

“Web Content Accessibility Guidelines (WCAG)” is an international standard for websites and web content that are accessible to people with a wide range of disabilities. More information on WCAG development and website accessibility can be found at the W3C Web Accessibility Initiative.

MULTI-YEAR ACCESSIBILITY PLAN

Graywood Developments maintains a multi-year accessibility plan outlining its strategy to prevent and remove barriers and to comply with the Regulation. The plan will be reviewed and updated at least every five years.

The accessibility plan is available on request and can be made available in an accessible format or with communication supports.

INFORMATION AND COMMUNICATION STANDARD

In accordance with the *Integrated Accessibility Standards Regulation* with respect to Information and Communications, Graywood Developments will endeavor to create, provide and receive information and communications in ways that are accessible to people with disabilities. Alternative formats are available at no additional cost and will be provided in a timely manner. If the information cannot be converted, Graywood Developments shall provide an explanation as to why the information or communications are unconvertible, and a summary of the content.

Web Content

Graywood Developments website conforms with WCAG 2.0, Level A, and all new web content on the Graywood Developments website will conform with WCAG 2.0, Level AA protocols by June 2021, other than criteria 1.2.4 (live captions) and 1.2.5 (pre-recorded audio descriptions).

Emergency Response Procedures

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

Training

Graywood Developments provides training on the Accessible Customer Service Standard and the *Integrated Accessibility Standards Regulation* requirements to all employees, including those who work with the public or other third parties. Training will be provided as part of the onboarding process for all new employees and will be refreshed where there are changes to the policies. Training will take place as soon as is practicable and a record of the training will be maintained.

Other training will be provided appropriate to the duties of specific individuals.

EMPLOYMENT STANDARD

Graywood Developments is committed to removing any barriers in employment faced by employees with disabilities. As such, Graywood Developments provides a working environment which complies with the requirements of the Employment Standards in the Regulation, and as established under the AODA. It is important to Graywood Developments that all employees with disabilities (including potential employees) find the workplace to be welcoming and supportive.

Recruitment, assessment, or selection process

Graywood Developments employees and the public are advised of the availability of accommodation for applicants with disabilities in its recruitment process on each of its job opportunity postings. When candidates are individually selected to participate further in an assessment or selection process upon request, and in consultation with the candidate, Graywood Developments will provide, or arrange, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability. Any existing accommodation plans will be considered throughout the process.

Employee notification

Graywood Developments informs its employees of its policies used to support its employees with disabilities: (a) to new employees as soon as practicable after they begin their employment; and (b) whenever there is a change to existing policies on the provision of job accommodations that take into account accessibility needs due to a disability.

Accessible formats and communication supports for employees

Graywood Developments, upon the request of an employee with a disability, consults with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and employment-related information that is generally available to other employees.

Individual Accommodation Plans

In accordance with the *Integrated Accessibility Standards Regulation* with respect to Employment, a process has been established for responding to requests for individual accommodation. Graywood Developments will provide job accommodations that take into account an employee's accessibility needs due to disability, where suitable and necessary.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

Workplace Emergency Response

Graywood Developments will work with employees to provide any additional reasonable accommodations that may be required in the event of an emergency and will document these measures in the employee's IAP. If an employee requires assistance in emergency situations, Graywood Developments will provide the employee's personalized workplace emergency response plan to a designated person(s), with the employee's consent and in a way that respects the employee's privacy.

Return to Work

If an employee is absent from work due to disability and requires accommodation consideration in order to return to work, Graywood Developments. And the employee will work together to develop a return

to work plan. Third party expertise will be accessed, when needed, in the development of the plan.

ACCESSIBLE CUSTOMER SERVICE STANDARDS

Graywood Developments are committed to providing access to our facilities and services in a way that respects the dignity and independence of persons with disabilities. We are committed to ensuring that persons with disabilities receive the same access to and quality of services.

Communication

Graywood Developments will communicate in ways that take into account the needs of persons with disabilities, such as, the use of devices to assist those who are hearing and visually impaired.

Assistive devices

Graywood Developments are committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from our services. These devices may include but are not limited to:

- manual and motorized wheelchairs, scooters, canes, crutches and walkers
- assistive technology such as screen readers, head mouse, screen magnifiers and voice recognition

Graywood Developments will take steps to ensure that its Representatives are familiar with commonly used assistive devices.

Use of registered service animals and support persons

Graywood Developments welcome clients and visitors who are accompanied by a registered service animal or support person to our premises. At no time will we prevent a client or visitor from having access to their registered service animal or support person while on our premises, except where prohibited by law for health and safety reasons.

Notice of temporary disruption

Graywood Developments will provide notice to clients and visitors with disabilities in the event of a planned or unexpected disruption to services or office facilities. The notice will include information about the reason for

the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services available (where applicable). If the disruption is unexpected, the notices will be provided as soon as the anticipated disruption becomes known.

Training

Training is provided to all employees on the purpose and requirements of the AODA legislation and specifically on how to:

- interact and communicate with people with various types of disabilities;
- interact with people who use assistive devices or require the assistance of a service animal or a support person;
- use equipment or devices available on-site or otherwise that may help with providing services to people with disabilities; and
- assist a client or visitor who is having difficulty accessing our services.

Training is provided to our employees as part of our new hire onboarding process and on an ongoing basis whenever changes are made to relevant policies and procedures. We will maintain records of the training provided, including the dates of the training and the number of (or the names of the) people trained.

FEEDBACK

Requests for information in accessible formats or communication supports, and feedback regarding accessibility can be made to:

Graywood Developments
Human Resources
200 King Street W
Suite 1602
Box 42
Toronto
ON M5H 3T4

Email: info@graywoodgroup.com

Should you wish us to provide or arrange for accessible formats and communication supports, please include the following with your request:

- your name
- your affiliation (e.g. customer, visitor etc.)
- contact information (telephone and/or email)
- a brief summary of your feedback