

# **Integrated Accessibility Standards Policy**

# **Commitment/Policy Statement**

Advantage Solutions ("Advantage" or "the Company") is committed and guided by the four core principles of Dignity, Independence, Integration, and Equal Opportunity and supports the full inclusion of persons as set out in the *Accessibility for Ontarians with Disabilities Act*, 2005 (the "AODA"). Advantage Solutions shall use every effort to ensure that we meet the needs of persons with disabilities in a timely manner, through the implementation of this policy.

#### **Information Guidelines**

Under the AODA all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards Regulation in the areas of Information and Communications and Employment for Advantage in accordance with Ontario Regulation 191/11 (the "Regulation") under the *AODA*.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. This policy has been drafted in accordance with the Regulation and addresses how the Company achieves accessibility through meeting the Regulation's requirements. This policy will be implemented in accordance with the time frames established by the Regulation and it provides the overall strategic direction that we will follow to provide accessibility supports to persons with disabilities.

In addition, the Company will develop and maintain an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the company's website. Upon request, the Company will provide a copy of the Accessibility Plan in an accessible format.

The Company is governed by this policy as well as the Accessible Customer Service Policy and the AODA in meeting the accessibility needs of persons with disabilities.

# **Training Employees and Volunteers**

Advantage will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training regarding the *Ontario Human Rights Code* as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Company's policies; and,

• all other persons who provide goods, services or facilities on behalf of the Company.

The training will be appropriate to the duties of the employees, volunteers and other persons.

Training will be provided as soon as practicable. If any changes are made to this policy or the requirements, then training will be provided. The Company will keep a record of the training it provides.

# INFORMATION AND COMMUNICATIONS STANDARDS

Advantage will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If the Company determines that it is not technically feasible to convert the information, the Company will provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

#### Feedback

Advantage has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request.

## **Accessible Formats and Communication Supports**

Upon request, Advantage will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

The Company will also, to the extent necessary or applicable, notify the public about the availability of accessible formats and communication supports.

## **Emergency Information**

If Advantage prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

#### **Accessible Websites and Web Content**

Advantage will ensure that our Internet websites meet the requirements of the AODA standard, including web content, and will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A, except where this is impracticable.

#### EMPLOYMENT STANDARDS

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how we provide accessibility throughout the entire employment cycle. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

## Recruitment

Advantage will notify its employees and the public about the availability of accommodation for applicants with disabilities upon request, in relation to the materials or processes to be used, for the three situations below:

- During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- If a selected applicant requests accommodation, the Company shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's needs due to disability;
- Notify successful applicants of the policies for accommodating employees with disabilities.

## **Employee Notification of Supports**

Advantage will inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

## **Accessible Formats and Communication Supports for Employees**

In addition and where an employee with a disability requests it, the Company will consult with the employee 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,
- Information that is generally available to employees in the workplace.

The Company will also consult with the employee making the request in determining the suitability of an accessible format or communication support.

# **Workplace Emergency Response Information**

Advantage 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 if the Company is aware of the need for accommodation due to the employee's disability.

The Company will provide this information as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

Where the employee requires assistance, the Company will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

The Company will review the individualized workplace emergency response information when the

employee moves to a different location in the organization, when the employee's overall accommodation needs change or plans are reviewed.

#### **Documented Individual Accommodation Plans**

Advantage will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

The process for the development of documented individual accommodation plans shall include the following elements:

- The employee's participation in the development of the accommodation plan;
- Assessment on an individual basis;
- Identification of accommodation to be provided;
- Timelines for the provision of accommodation;
- The Company may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- Employee may request participation of a representative from the workplace in the development of the accommodation plan;
- Steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided;

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

#### **Return to Work Process**

Advantage maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process outlines the steps the Company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the *Workplace Safety Insurance Act*, 1997).

# Performance Management, Career Development and Advancement & Redeployment

Advantage will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, and/or when redeploying employees.

## **Transportation Standard**

The Transportation Standard will make it easier for people to travel in Ontario, including persons with

disabilities, older Ontarians and families travelling with children with strollers. The Company is not affected by the Transportation Standard but will ensure that staff is aware of the future changes and positive impact it will have on public transportation.

# QUESTIONS ABOUT THIS POLICY

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. This policy will be posted on the company's website and The Company will provide a copy of the policy in an accessible format, upon request. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

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