

Integrated Accessibility Standards Regulation Policy

Information and Communications, Employment, Transportation and Public Spaces

1. Purpose

Under the *Accessibility for Ontarians with Disabilities Act, 2005* 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 Employment, Information and Communications, Transportation and Public Spaces for Red Apple Stores Inc. in accordance with Ontario Regulation 191/11, Ontario Regulation 413/12 and with the Ministry of Community and Social Services. The intent of the regulation is to "*streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations*". The Integrated Accessibility Standards Regulation came into force July 1, 2011.

2. Statement of Commitment

Red Apple Stores Inc. ("Company") is committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities, in a timely manner, and will do so by working to prevent and remove barriers to accessibility and by meeting accessibility requirements under the *Accessibility for Ontarians with Disability Act*.

3. Scope and Responsibilities

This policy and plan has been drafted in accordance with the regulation and addresses how the Company achieves accessibility through meeting the regulation's requirements. It provides the overall strategic direction that the Company will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include the following four (4) sections:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the Company strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- Training; and
- Other specific requirements under the Information and Communications, Employment Transportation Standards and Public Spaces.

4. Definitions

Below is a list definitions in alphabetical order used in this policy and plan:

Accessible Formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Accommodation means the special arrangement 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, alternative and augmentative communication supports, 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.

Conventional Transportation Service Provider means designated public sector transportation organized that provides conventional transportation services that operates solely within the Province of Ontario.

IAP means Individualized Accommodation Plan.

IASR means Integrated Accessibility Standards Regulation

Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Internet Website means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

Kiosk means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Maintenance of Public Spaces means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.

Medical Aid means an assistive device including but not limited to: respirators, and portable oxygen supplies.

Mobility Aid means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device means a cane, walker, wheelchair, scooter or similar aid.

New Internet Website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Ready Format means an electronic or digital format that facilitates conversion into an accessible format.

Redeployment means the reassignment of associates to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Specialized Transportation Services means public passenger transportation services that operate solely with the Province of Ontario, are provided by a designated public sector transportation organization and are designed to transport persons with disabilities.

Unconvertible means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines means the World Wide Web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines” (WCAG) 2.0.

5. General Provisions

This section covers the general requirements of the Integrated Accessibility Standards Regulation.

Multi-Year Accessibility Plan

The Company's Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*. The Company will report annually on the progress and implementation of the plan, post the information to the Company website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years. The plan will be complete by December 31, 2013.

Procuring or Acquiring Goods, Services or Facilities

The Company is not required under this legislation to ensure we use accessibility criteria and features when procuring or acquiring goods, services or facilities. The Company will however, take it into consideration, accessibility criteria and features as much as possible, when procuring or acquiring goods, services or facilities to show our commitment to accessibility.

Training

The Company will ensure that training is provided to all Associates on the requirements of the accessibility standards referred to in the regulation and on the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable. Training will be provided in a way that best suits the duties of associates and volunteers. If any changes are made to this policy or the requirements, training will be provided to include those changes. The Company shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided. The Company shall ensure that others that provide goods, services or facilities on behalf of the organization have had training.

Self Service Kiosks

The Integrated Accessibility Standard Regulation requires that large organizations must have regard to the accessibility for persons with disability when designing, procuring or acquiring self-service kiosks. In the event that the Company utilizes self-service kiosks, it will comply with this provision.

6. Information and Communications Standard

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

In the event the Company determines that it is not technically feasible to convert the information or communications, or the technology to convert the information or communications is not readily available, 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.

Accessible Emergency Information

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

The Company is committed to providing its customers with publicly available emergency information in an accessible way upon request. We will provide associates with disabilities with individualized emergency response information when necessary.

Feedback

The Company has a process in place for receiving and responding to feedback from customers, third parties and visitors. The feedback processes can be provided in accessible formats and with communication supports upon request. The Company will notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

The Company shall provide or arrange for accessible formats and communication supports for persons with disabilities by following the four bullets listed below:

- i. Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- ii. At a cost that is no more than the regular cost charged to other persons;
- iii. Consult with the person making the request and determine suitability of an accessible format or communication support;
- iv. Notify the public about the availability of accessible formats and communication supports.

Website Accessibility

The Company shall make their internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2021 all internet website and web content backdated to 2012 will conform to WCAG 2.0 Level AA.

7. Employment Standard

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

The requirements of the Employment Standard shall be met by the Company. For further clarification and specific details you can also refer to the Company's Multi-Year Accessibility Plan.

Recruitment

The Company Red Apple Stores Inc. shall notify associates and the public about the availability of accommodations for applicants with disabilities as per three (3) bullets below:

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

Employee Notification

The Company shall inform its associates of its policies used to support its associates with disabilities, including but not limited to, policies on the provision of job accommodations that

take into account an associate's accessibility needs due to a disability for the two (2) situations below:

- i. As required to new associates as soon as practicable after they begin their employment;
- ii. Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Accessible Formats and Communication Supports

In addition and where an associate with a disability requests it, the Company will consult with the associate to provide or arrange for the provision of accessible formats and communication supports as per the following three (3) bullets below:

- i. Information that is needed in order to perform the associate's job;
- ii. Information that is generally available to associate in the workplace; and
- iii. Consult with the associate making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

The Company shall have in place, as outlined in the Multi-Year Accessibility Plan, a written process for developing a documented individual accommodation plan for associates with a disability. Process to include the twelve points below:

- i. The associate's participation in the development of the IAP;
- ii. Assessment on an individual basis;
- iii. Identification of accommodations to be provided;
- iv. Timelines for the provision of accommodations;
- v. The Company's process for requesting an evaluation by outside medical or other expert, to assist with determining accommodation and how to achieve accommodation;
- vi. Where required the process for handling workplace representatives;
- vii. Steps taken to protect the privacy of the associate's personal information;
- viii. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- ix. If denied, the reasons for denial;
- x. A format that takes into account the associate's disability needs;
- xi. If requested, any information regarding accessible formats and communication supports provided;
- xii. Identification of any other accommodation that is to be provided.

Return to Work

The Company will have in place a return to work process for associates who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and must outline the steps that the Company will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement and Redeployment

The Company will take into account the accommodation needs and/or individual accommodation plans of associates for the three points below when:

- i. Using performance management processes;
- ii. Providing career development and advancement information;
- iii. Using redeployment procedures.

Workplace Emergency Response Information

The Company shall provide individualized workplace emergency response information to associates who have a disability as per the following four (4) points below:

- i. If the disability is such that the individualized information is necessary and the company is aware of the need for accommodation due to the associate's disability;
- ii. If the associate who receives an individual workplace emergency response information requires assistance and with the associate's consent, the Company shall provide the workplace emergency information to the person designated by the Company to provide assistance to the Associate;
- iii. As soon as practicable after becoming aware of the need for accommodation due to the associate's disability;
- iv. Review the individualized workplace emergency response information when the associate moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the company reviews its general emergency response policies.

8. Transportation Standard

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers.

The Company is not affected by the Transportation Standard; therefore no action is required by the company at this time.

9. Public Spaces

The Company shall: incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2017; follow the existing requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment maintenance) as applicable; provide maintenance and restoration of public spaces by ensuring the Company's Multi-Year Accessibility Plan includes procedures for preventative and emergency of accessible elements in public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order. For further clarification and specific details refer to the Company's Multi-Year Accessibility Plan.

10. For more Information

For more information on the Company accessibility policy or plan, please contact:

Human Resources

Phone: (905) 293-9700

E-mail: hrdept@redapplestores.com

Accessible formats of this document are available upon request.