

FRAGOMEN

Accessibility Policy

1. Scope

This Policy applies to all operations at Fragomen (Canada) Co. (“Fragomen” or “the Company”).

2. Purpose

This Policy is intended to comply with the principles and guidelines set out in the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). The content is designed to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* (IASR), as well as Fragomen’s accessibility and inclusion goals throughout its Canadian operations.

This Policy and the Responsibilities described in Section 5 apply to Fragomen’s Canadian operations, with the goal of removing and preventing accessibility barriers for its employees and clients. If any barriers to Fragomen’s services, goods, or facilities are identified but cannot be removed, we seek to provide alternate ways to access.

3. Statement of Commitment to Accessibility

Fragomen (Canada) Co. is committed to providing a safe, dignified, and welcoming environment for everyone. We are committed to providing accessible and inclusive services, goods, information, and facilities, wherever possible. The Company is committed to meeting the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and all applicable accessibility and human rights legislation in our operations throughout Canada. We strive to incorporate the principles of dignity, independence, integration, and equality of opportunity in all of our operations.

4. Definitions

The following terms are used in this Policy and have the following meanings:

Accessible, Accessibility: products, services, facilities or environments that can be accessed, used by, or understood by all persons, including those with disabilities

Accessible or Alternate Formats: include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities

Assistive Devices: any device used to assist persons with disabilities, including:

- Mobility assistive devices, such as a cane, walker, wheelchair, electronic scooter, or similar device used to assist with mobility;
- Communication devices, such as a hearing device, laptop computer, communication board, or similar device used to assist with communication; or
- Medical devices, such as a personal oxygen tank or similar device used to assist with medical requirements of a disability

Barrier: can be anything – including anything physical, architectural, technological, attitudinal, related to information or communications, or anything that is the result of a system, policy or practice – that hinders the full and equal participation in society of persons with a disability or functional limitation.

Disability: This Policy uses the AODA and *Ontario Human Rights Code* definition of disability, which defines a disability as:

- 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 other 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*; (“handicap”).

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

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

Public spaces: As defined by the AODA, public spaces include:

- Recreational trails/beach access routes;
- Outdoor public eating areas like rest stops or picnic areas;
- Outdoor play spaces, like playgrounds in provincial parks and local communities;
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals;
- Accessible off-street parking;
- Accessible on-street parking; and
- Service-related elements like service counters, fixed queuing lines and waiting areas

Service Animal: As defined by the AODA, an animal is a service animal for a person with a disability if:

- a) The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as an identifying vest or harness worn by the animal; or
- b) The person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to a disability:
 - i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - ii. A member of the College of Chiropractors of Ontario.
 - iii. A member of the College of Nurses of Ontario.
 - iv. A member of the College of Occupational Therapists of Ontario.
 - v. A member of the College of Optometrists of Ontario.
 - vi. A member of the College of Physicians and Surgeons of Ontario.
 - vii. A member of the College of Physiotherapists of Ontario.
 - viii. A member of the College of Psychologists of Ontario.
 - ix. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. O. Reg. 165/16, s. 16.

Support Person: In relation to a person with a disability, a support person is any person who accompanies a person with a disability in order to help with communication, mobility, personal care, medical needs, or with access to goods, services or facilities.

Web Content Accessibility Guidelines: refers to the World Wide Web Consortium (W3C) recommendations entitled Web Content Accessibility Guidelines (WCAG)

5. Responsibilities

Training

Fragomen (Canada) Co. will provide accessibility training to all employees. This training will be provided during the initial onboarding period, when changes are made to Fragomen's accessibility policies or procedures, and when changes are made to accessibility legislation affecting regional employees.

Accessibility training will cover, at minimum:

- Principles, goals, and customer service standards of applicable accessibility legislation;
- An overview of applicable Human Rights Code content that relates to persons with disabilities;
- How to interact and communicate with persons with various types of disabilities;
- How to interact and communicate with persons with disabilities who use an assistive device or require the assistance of a service animal or support person;

- What to do if a person is having difficulty accessing Fragomen's goods, services, or facilities and wants to communicate a complaint or provide feedback to the Company; and
- Details of Fragomen's Accessibility Policy and Fragomen procedures applicable to the employee's role.

The Company will also ensure that those who are involved in the development and approval of accessibility-related policies, practices and procedures are trained on applicable accessibility legislation and Human Rights Code content that relates to persons with disabilities.

The Human Resources (HR) Manager will maintain training records for each Fragomen employee.

Information and Communication

Fragomen (Canada) Co. will provide information about the Company and its services, including public safety information, in accessible formats or with communication supports, upon request. The Company will also meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements with any web content that it controls or manages.

We will communicate with persons with disabilities in formats that take into account their disability and accessibility needs and, whenever possible, in the manner they request. Upon request, Fragomen will provide or arrange for the provision of accessible or alternate formats and communication supports for persons with disabilities, in a timely manner and at no additional cost to the individual.

In the event that Fragomen determines information or communications cannot be provided in the format requested, the Company will provide the individual making the request with an explanation. The Company will also provide a summary version of the information or communication requested.

Assistive Devices

Fragomen (Canada) Co. is committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from the Company's goods and services. Staff will be trained on how to interact with persons with disabilities who use an assistive device. In the event that an individual experiences a barrier when attempting to use their assistive device to access the Company's goods, services, or facilities, Fragomen staff will work with the customer to seek to provide alternate ways to accommodate their access request.

Service Animals

Fragomen (Canada) Co. is committed to welcoming persons with disabilities who are accompanied by a service animal on Company premises that are open to the public and other third parties. If a service animal is excluded by law from the premises (for example, in an area where food is being prepared in a commercial kitchen), then Fragomen will make every effort to enable the person with a disability to access the Company's services in an alternate manner, if possible. Company employees will be trained on how to interact with persons with disabilities who require the assistance of a guide dog or other service animal.

Support Persons

Fragomen (Canada) Co. is committed to welcoming persons with disabilities who are accompanied by a support person. Company staff will be trained on how to interact with persons with disabilities who require the assistance of a support person.

Any person with a disability who is accompanied by a support person will be allowed to access Company premises that are open to the public and other third parties. 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 the premises. Fees will not be charged for support persons for admission to Company premises.

Notice of Temporary Disruption

Fragomen (Canada) Co. will provide notice in the event of a planned or unexpected disruption in accessible services or facilities usually used by persons with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Property Management for the Ontario facility in which Fragomen resides will post the notice at the front entrance of the facility. For lengthy disruptions, Fragomen will post a notice on its website at <https://www.fragomen.com/about/offices/ca/toronto/overview>. Fragomen will communicate details of a disruption to Fragomen facilities or services to employees and the public in means that are appropriate to the service disruption.

Accessibility Feedback

Feedback regarding accessibility to services and goods and the manner in which Fragomen employees and volunteers interact with others is welcome and appreciated. Customer feedback assists us in identifying and removing barriers to accessibility in our goods, services, and facilities. The Fragomen Accessibility Feedback Form is available upon request and on the Company website at <https://www.fragomen.com/about/offices/ca/toronto/overview>.

Establishment of Accessibility Policies and Plans

Fragomen will create and maintain a multi-year accessibility plan outlining its strategy to identify, prevent and remove barriers and to meet its requirements under accessibility legislation. The Company will post its Accessibility Policy and Multi-year Accessibility Plan on its website at <https://www.fragomen.com/about/offices/ca/toronto/overview> and will provide these documents in an alternate format upon request.

The Company will review and update its accessibility plan every five years, in consultation with members of its Health and Safety Committee and other Fragomen staff interested in providing feedback during the review period.

Procuring or Acquiring Goods, Services, or Facilities, including Self-Serve Kiosks

The Company will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks, except where it is not possible or practical to do so. If it is not possible and practical to incorporate accessibility criteria when procuring or acquiring goods, the Company will provide an explanation upon request.

Hiring (for applicants)

Fragomen is committed to being inclusive in our hiring policies. We will notify the public that we will accommodate the needs of persons with disabilities throughout our selection and hiring process. During the selection process, we will include the following paragraph in print and online job postings:

Fragomen (Canada) Co. is committed to building a diverse team through inclusive recruitment and selection. We welcome and encourage applications from individuals from all backgrounds, perspectives, and communities. If you require an accommodation during the selection process, please inform us as soon as possible at canadainfo@fragomen.com [or HR contact] and we will make every effort to fulfill your accommodation request.

When scheduling an interview, we will ask applicants if they have any accommodation requests. If an interview candidate requests an accommodation, we will discuss their request with them and make every effort to fulfill their accommodation requests.

Workplace information (for employees)

Upon request by an employee, the Company will provide workplace information in an accessible or alternate format or offer communication supports when needed. Workplace information includes:

- Any information employees need to perform their jobs (for example, job descriptions and manuals); and
- General information that is available to all employees at work (for example, employment policies, company newsletters, bulletins about company policies, and health and safety information).

The Company will work with employees who request accommodations to determine how best to meet their needs and to provide accessible workplace information in a timely manner. We will work with employees with disabilities to develop individual accommodation plans. Where necessary, these plans will also include individual emergency response plans and information to assist during an emergency or evacuation.

The Company will take into account any accessibility needs identified by employees during performance management, career development and redeployment processes.

Design of Public Spaces

When building or making major changes to public spaces of its facilities, the Company will ensure that accessible designs are incorporated wherever possible.

Communicate accessibility policies

The Company will inform all employees about policies to support persons with disabilities. Its Accessibility Policy and employment policies will be reviewed with new employees when they are hired. If any Fragomen accessibility policies or procedures are modified, all current employees will be informed.

The current Fragomen (Canada) Co. Accessibility Policy and public accessibility plans and procedures are posted at <https://www.fragomen.com/about/offices/ca/toronto/overview>.

Changes to existing Company policies

Fragomen (Canada) Co. will modify or remove any existing Company policies that do not respect and promote the dignity and independence of persons with disabilities.

Contact Fragomen (Canada) Co.

If you have any questions or feedback, accommodation requests, or would like to request a copy of any Company accessibility policies or plans in an alternate format, contact us at:

Fragomen (Canada) Co.

canadainfo@fragomen.com

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