

## **ACCESSIBILITY POLICY**

### **Purpose:**

CarltonOne Engagement is committed to diversity, inclusion and accessibility for persons with disabilities. The purpose of this policy is to establish policies, practices and procedures to ensure CarltonOne Engagement is accessible to people with disabilities in accordance with Accessibility for Ontarians with Disabilities Act, 2005 (the "Act").

### **Policy Statement:**

CarltonOne Engagement is committed to ensuring equal access, service, and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

### **Application:**

This policy applies to all CarltonOne Engagement employees in Ontario.

### **General Principles and Practices:**

CarltonOne Engagement shall meet its duties and responsibilities under the "Act" by adhering to the following principles and practices:

#### **1. Communication**

CarltonOne Engagement is committed to communicating with persons with disabilities in ways that consider their disability.

#### **2. Training of employees**

CarltonOne Engagement will provide training to all its workers regarding the provisions and ways to ensure accessible programs, goods, services, and workplace.

Training will occur on an ongoing basis and whenever changes are made to relevant policies, practices and procedures.

#### **3. Assistive devices**

CarltonOne Engagement permits persons with disabilities to use their personal assistive devices while on its premises.

#### **4. Service animals and support persons**

CarltonOne Engagement welcomes onto its premises people with disabilities and their service animals and support persons upon whom persons with disabilities rely.

## **5. Notice of temporary disruption**

CarltonOne Engagement will give notice of temporary disruptions to services or facilities used by persons with disabilities including the reason for the disruption, the anticipation of the disruption and any alternative facilities or services that may be available. The notice shall be posted in a conspicuous place on the premises.

### **Procedure:**

To request accommodation or assistance for any good or service, contact CarltonOne Engagement by phone or email.

## **1. Feedback process**

CarltonOne Engagement encourages feedback regarding how it provides goods and services to persons with disabilities. This can be provided via the following methods:

- E-mail: through the “Talk to us” link on our website  
or by e-mail: [info@carltonone.com](mailto:info@carltonone.com) or [HumanResources@carltonone.com](mailto:HumanResources@carltonone.com)
- Mail: Attn: Human Resources  
60 Columbia Way, 9<sup>th</sup> Floor  
Markham, ON L3R 0C9
- Phone: 866.451.2225

## **2. Modifications to this or other policies**

CarltonOne Engagement is committed to ensuring that its policies, practices and procedures are consistent with and promote the core principles of dignity, independence, integration and equal opportunity. Any policy that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

## **3. Policy Review**

CarltonOne Engagement will maintain the Accessibility Plan & Policy outlining the Company’s strategy to prevent and remove barriers from its workplace and to meet its requirements under the “Act”.

## **4. Compliance**

Employees are expected to comply with all parts of this policy. Failure to comply will result in discipline, up to and including termination for cause.

## **ACCESSIBILITY PLAN**

### **Assistive Devices**

CarltonOne Engagement will ensure that its staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

Persons with disabilities may use their own assistive devices as required when accessing goods and services at any CarltonOne Engagement location.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

### **Communication**

CarltonOne Engagement will communicate with people with disabilities in ways that consider their disability.

- Train employees to be aware of signs of communications problems;
- Asking the person how they would like to be communicated with;
- Communicate with person with a disability in a manner that considers his/her disability.

### **Service Animals**

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises (in Ontario) that are open to the public.

### **Support Persons**

If a customer with a disability is accompanied by a support person, CarltonOne Engagement will ensure that both persons can enter the premises and the customer will not be prevented from having full access to the support person. In situations where confidential information might be discussed, consent will first be obtained from the customer, prior to any such conversation or disclosure.

Fees will not be charged for support persons. In the event a third party is hosting an event and charging fees for the event, the support person will be allowed to attend the event at their own cost, unless not required by the third party.

Should this situation change in the future, we will notify customers of this through a notice posted on our premises and at the time of booking any appointments.

### **Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, CarltonOne Engagement will notify customers promptly. CarltonOne Engagement will give notice of temporary disruptions to services or facilities used by persons with disabilities including the reason for the disruption, the anticipation of the disruption, and any alternative facilities or services that may be available. The notice shall be posted in a conspicuous place on the premises.

### **Training for Staff**

Training will be provided to all CarltonOne Engagement employees in Ontario, those that assist in developing policies and procedures that govern the provision of goods and services to the public, and others who deal with the public or other third parties on their behalf. This training will be given to all new employees as part of their orientation. All training records will be kept in employee files.

Training will include:

- an overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard;
- how to interact and communicate with people with various types of disabilities;
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- what to do if a person with a disability is having difficulty in accessing CarltonOne Engagement goods and services;

Staff will also be trained when changes are made to this plan.

### **Feedback process**

Customers who wish to provide feedback on the way CarltonOne Engagement provides goods and services to people with disabilities can do so by speaking with the representative whom they are dealing with, by contacting CarltonOne Engagement via e-mail or phone.

All employee feedback should be directed to the Team Lead/ Supervisor/ Manager, Health and Safety, or Human Resources.

### **Modifications to this or Other Policies**

Any policy of CarltonOne Engagement that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

### **Providing Goods and Services to People with Disabilities**

CarltonOne Engagement is committed to excellence in servicing all customers, including persons with disabilities. CarltonOne Engagement appreciates the difficulties that can be faced by people with disabilities and strives to ensure that it can provide its services in a way that minimizes those difficulties.

### **Recruitment and Selection**

CarltonOne Engagement will notify its employees and the public, including internal and external job applicants about the availability of accommodation for applicants with disabilities in its recruitment processes. Where needed, accommodations for disabilities will be provided, on request, to support their participation in all aspects of the recruitment process.

CarltonOne Engagement will notify candidates that accommodations are available upon request in relation to the materials or processes to be used.

During the application process, CarltonOne Engagement will provide necessary support to the applicants. We will consult with the selected applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

### **Employment**

CarltonOne Engagement will inform its employees of the policies used to support employees with disabilities. We will provide this information to new employees as a part of their orientation. All existing employees will be provided with updated information on changes in accessibility policies whenever there is a change to existing policy.

### **Accessible formats and communication support for employees**

CarltonOne Engagement will consult with the employee, on employee's request, to provide or arrange for the provision and identify suitability of accessible formats and communication supports for the information that is needed to perform the employee's job; and the information that is generally available to employees in the workplace.

### Workplace Emergency Response Information

CarltonOne Engagement will provide individualized workplace emergency response information to employees who have a disability or to the person designated to aid the employee with disability, if the disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee's disability (permanent or temporary).

The individualized workplace emergency response information will be reviewed when the employee moves to a different location in the organization; when the employee's overall accommodations needs, or plans are reviewed; and when the company reviews its general emergency response policies.

### Individual Accommodation Plans

CarltonOne Engagement will develop individual accommodation plans for employees with disabilities of which they have been made aware.

CarltonOne Engagement has established the process of inquiring all employees about their accommodation needs during initial onboarding process through an Employee Information Form.

There may be times where an employer may initiate a dialogue to offer assistance and accommodation to an employee who is clearly unwell or perceived to have a disability.

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

1. An employee requesting accommodation will have the opportunity to participate in the development of the individual accommodation plan and will be able to provide own point of view on the accommodation required in his/her circumstances.
2. The employee will be assessed on an individual basis, based on his/her needs.
3. The employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.
4. The employee can request the participation of a workplace representative in the development of the accommodation plan.
5. Employee's personal information will be held confidential and will be shared only with the parties involved in the accommodation process.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the way it will be done.

7. If an individual accommodation plan is denied, the reasons for the denial will be provided to the employee.
8. Individual accommodation plan will be communicated to the employee by the means and in a format that considers the employee's accessibility needs due to disability.
9. If requested, individual accommodation plans will include any information regarding accessible formats and communications supports available.
10. If required, individual accommodation plans will include individualized workplace emergency response information; and identify any other accommodation that is to be provided.

Employee's emergency response information will be reviewed when:

- a) The employee changes work locations
- b) Employee's overall accommodation needs are being reviewed
- c) Organization's general emergency response policies are being reviewed.

*Responsibilities of employer:*

- Provide the same level of safety for all employees and visitors during evacuations.

Following an emergency, employer's responsibilities are:

- Call a staff meeting within 48 hours to talk about what has happened
- Acknowledge the fear, anxiety and loss workers are experiencing
- Provide information about next steps
- Inform employees on when, where, and how operations will resume, if worksite operations have been disrupted

*Responsibilities of employee with a disability:*

- Be familiar with the building and the evacuation options – exits, stairwells, ramps, areas of refuge
- Know your workplace emergency evacuation plan
- Work with employer to select co-workers who can assist you in case of an emergency
- Participate in emergency drills
- Be aware of the emergency notification systems at the workplace
- Take responsibility for disability-specific needs, including having own personal preparedness kit with extra medication, extra batteries for personal assistive devices, extra tire or a tire repair kit for wheelchair users, and any other contingency supplies specific to the person's disability

*Responsibilities of emergency wardens:*

- Ensure that safe evacuation process is followed during the evacuation, and collect accurate information about evacuated employees and visitors
- Provide information to first responders when they arrive about the number of evacuated employees and visitors including people with disabilities waiting in areas of refuge and where they are located

*Responsibilities of all employees:*

- Follow evacuation procedure during the evacuation
- Accompany and ensure safe evacuation of persons with disabilities that an employee is assigned to assist
- Accompany clients or visitors an employee is with during the emergency, and ensure their safe evacuation

Return to Work

CarltonOne Engagement has a return to work policy and process in place to help employees to return to work when they have been absent because of their disability and they need some form of accommodation to return to work. Return to work plan will be appropriate for employees who have permanent, recurring or temporary disabilities and require disability-related accommodation to effectively return to work.

Performance Management

CarltonOne Engagement will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. If employee responsibilities change as a result of performance management process, and the employee has a disability, CarltonOne Engagement will revisit the employee's individual accommodation plan to ensure that all necessary adjustments are made.

Career Development and Advancement

CarltonOne Engagement will take into account the accessibility needs of the employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to the employees who have disabilities.

CarltonOne Engagement will take into account what accommodations employees with disabilities may need to succeed elsewhere in their organizations or to take on new responsibilities in their current position.

Redeployment

CarltonOne Engagement will take into account the accessibility needs of the employees with disabilities as well as any individual accommodation plans, when redeploying employees who have disabilities.

During the redeployment processes, CarltonOne Engagement will consider the accessibility needs of employees with disabilities, as well as reviewing individual accommodation plans when moving employees with disabilities to other jobs within the organizations, so that employees can continue to have their accommodation.



## **EMERGENCY RESPONSE PLAN**

CarltonOne Engagement is committed to having an emergency plan in place to assist workers and office visitors to respond to any emergency.

The Emergency Coordinator is the person who serves as the main contact person for the company in an emergency. The Emergency Coordinator is responsible for making decisions and following the steps described in this emergency response plan.

### **Emergency Contact Numbers:**

Fire, Emergency, Police, Ambulance	911
Poison Control	1-800-268-9017
Ministry of Labor	1-800-531-5551
Hydro	1-877-777-3810
Gas	1-866-763-5427
City of Markham	905-477-5530
City of Markham      After Hours Emergencies	905-477-7000

### **Evacuation:**

- **Stay calm**  
The alarm will be loud, and you might find yourself feeling confused or panicked. It is important to stay calm. Do not take anything with you. Walk quickly but do not rush or push.
- **Evacuate the building by walking to the nearest emergency exit**  
Locate the stairwell nearest your workstation. Familiarize yourself with both evacuation exits in case you are unable to reach your designated stairwell (see office floor plan below).
- **Congregate in the green space near south of the parking garage** – this is our muster point (see image below)  
All Carlton One Engagement employees are required to meet in the field to the south of parking lot, as indicated in the image below. In winter, where snow cover may interfere with this location, move in the direction of the congregation area, ensuring that you are off the roadway and not under the parking garage.
- **Wait for a headcount to be conducted**  
We need to do a review to ensure everyone has been evacuated safely.
- **Do not leave the site or re-enter building until the all clear has been given.**

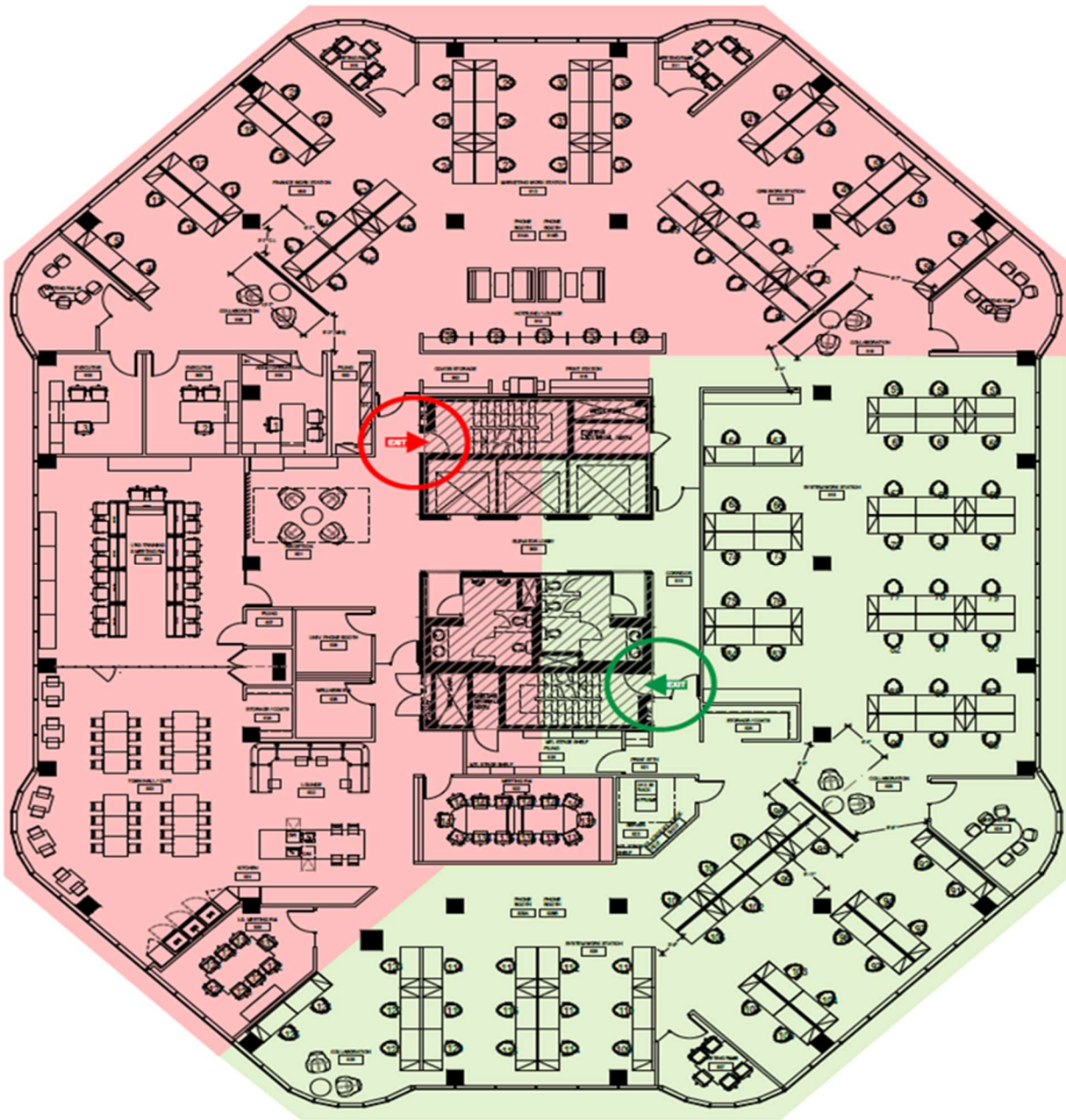
## Fire Wardens

Fire Wardens will do a sweep of their area before exiting the building to ensure everyone is safely exiting and assisting anyone who might need help.

## Special Assistance

If anyone cannot traverse the stairs, arrangements must be made ahead of time. Please contact HR, Josh Lake or Philip Daly.

CarltonOne Engagement - 60 Columbia Way, 9<sup>th</sup> Floor – Office Floor Plan



CarltonOne Engagement - 60 Columbia Way, 9<sup>th</sup> Floor – Muster Point



**Injury:**

- Have designated 1<sup>st</sup> aider attend to the injury or call 911 (as necessary)
- Ensure attendants wear gloves to protect from blood or bodily fluid if there is a chance of exposure
- Dispose of contaminated materials in an appropriate manner (use biohazard waste bag in first aid kit)
- After performing any first aid, a 1<sup>st</sup> aider must complete a First Aid Record form.

**Severe Weather (e.g. tornado):**

- Evacuate to the location that's away from windows and external doors, preferably near to concrete walls
- Await further instructions from local emergency response personnel and/or property management

## **RETURN TO WORK POLICY**

### **Purpose:**

In an effort to provide a safe and healthy workplace, CarltonOne Engagement is committed to the prevention of workplace injury and/or illness. The Return to Work Policy has been established to accommodate employees' return to work after injury, illness, and / or temporary or permanent disability. In the event of injury, illness, or disability, CarltonOne Engagement is committed to taking all reasonable steps to ensure a safe, timely return to the workplace.

### **Application:**

This policy applies to all employees who are unable to perform their regular work as a result of injury, illness, temporary or permanent disability. All employees must fully cooperate in the safe and timely return to work of all injured, ill, or disabled employees.

The program is:

- Voluntary;
- Respectful of all employees;
- Flexible;
- Specifically designed for each employee's abilities.

Safe and timely return to work recognizes that while an employee cannot perform the full range of regular duties, meaningful, productive work can be performed. We will work with affected workers to identify suitable work and develop individualized return to work plans based upon functional abilities information provided by health care providers.

CarltonOne Engagement will undertake the accommodation of injured and disabled workers through reasonable accommodation. CarltonOne Engagement will assist workers in a timely and appropriate return to their pre-injury jobs. If this is not possible, temporary alternate or modified duties will be arranged, whenever possible.

All personal information about the injured worker will be held confidential and shared only with the permission of the worker or by statutory requirement.

### **Roles and Responsibilities:**

#### **Worker with Disabilities**

1. Provide employer with regular updates on functional ability throughout recovery

2. Participate in prescribed treatment and rehabilitation programs
3. Assist employer to identify suitable work consistent with functional abilities specified by physician
4. Accept suitable work when identified
5. Work within the identified limitations and/or restrictions
6. Work with the employer to address any concerns that may arise

Employer

1. Consider functional restrictions specified by employee's physician when determining reasonable accommodation and designing the return to work plan
2. Consult with the employee when designing the return to work plan
3. Supervise and monitor the return to work plan
4. Work with the employee and his/her physician to address any concerns that may arise
5. Provide employee assistance program information (if applicable)

All Workers

1. Support your co-workers to help them return to work



## **RETURN TO WORK PROCESS AND PLAN**

### **Purpose:**

Return to work process and plan are established to help employees to return to work when they have been absent because of their illness, injury, or disability and they need some form of accommodation to return to work. Return to work plan will be appropriate for employees who have permanent, recurring or temporary disabilities and require disability-related accommodation to effectively return to work.

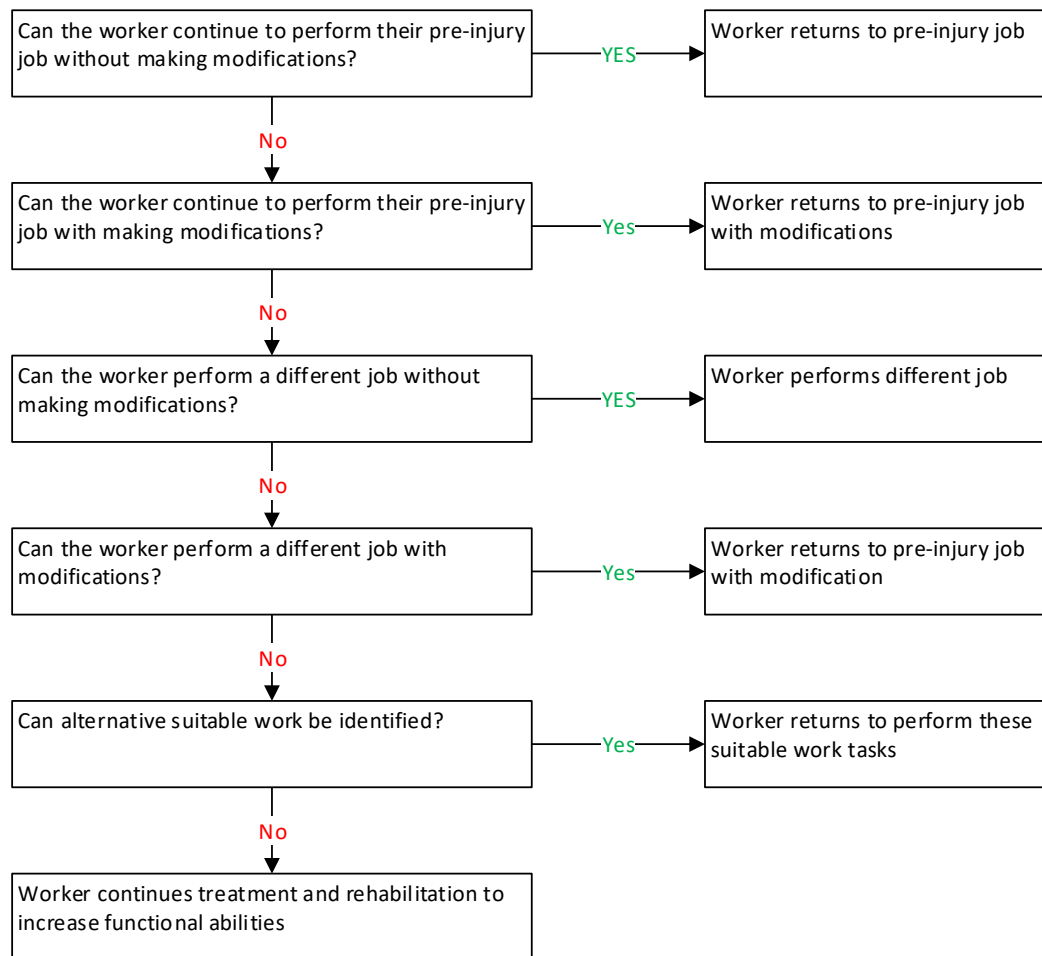
### **Process:**

1. Prior to the return to work or if accommodation is required, employee has to obtain a completed Medical Absence Form from the physician and submit it to the manager/supervisor/ or team lead as well as Human Resources. This will ensure that the employer is able to evaluate and understand if modified work can be offered, and if so, what kind of restrictions may be present. The employer will work to identify the ways to reasonably accommodate the disability and create an individualized return to work plan.
2. CarltonOne Engagement will take restrictions specified by the physician and employee input into consideration in reasonable accommodation of disability and finding suitable work for employees with disabilities. Employee is expected to work with Human Resources and Management on a Return to Work Plan and will sign the Modified Work Agreement once it's finalized.
3. Individual Return to Work plans will be monitored on an on-going basis after employee's return to work, or after accommodation was requested. Following are the steps in monitoring employee's return to work program:
  - Upon the finalization of return to work plan, start with step 1 of the plan.
  - Continue monitoring the recovery progress based on on-going evaluation by the healthcare provider. CarltonOne Engagement may request that employee provides additional, updated Medical Absence Forms completed by the physician. Monitoring and follow-up meetings will take place weekly/bi-weekly/ or monthly, based on the nature of disability and/or accommodation.
  - If the disability is temporary, return to work plan will be adjusted according to the progress of the recovery process and physician's recommendations.
  - If the disability is permanent, reasonable accommodations will be identified and the return to work will be implemented. These accommodations will be in line with physician's specifications of restrictions. Follow up meetings and evaluations will take place for any adjustments to the plan if needed.
  - Restrictions can be removed only by the physician in writing.

4. Return to work plan can be completed when employee recovers from temporary disability. Restrictions can be removed only by the physician in writing.

5. Identify suitable work.

When identifying suitable work, following steps are to be followed:



**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) POLICY**  
**ACKNOWLEDGEMENT**

I acknowledge that I have read and understand following CarltonOne Engamenet's policies:

1. Accessibiloity policy and plan that include information about providing goods and services to people with disabilities; and accomodation for applicants and employees with disabilities
2. Emergency response plan
3. Return to work policy, process, and plan
4. Emergency evacuation procedure.

Employee name	Jashandeep Brar
Employee signature	<i>Jashan Brar</i>
Date	June 22, 2020