

## **Accessibility Policy and Multi-Year Accessibility Plan**

### **Ontario, Canada**

This accessibility policy and plan outlines how The State Group Inc. (“State Group”) complies with Ontario *Regulation 191/11* (“Integrated Accessibility Standards”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

#### **Introduction**

The Integrated Accessibility Standards Regulations (“IASR”) under the AODA require that State Group establish, implement, maintain, and document its accessibility policies and multi-year accessibility plan (the “Accessibility Plan”), which outlines State Group’s strategy for preventing and removing barriers for persons with disabilities and to meet our requirements under the IASR. The Accessibility Plan will be posted in a conspicuous place in the workplace where it may reasonably come to the Public’s attention, on The State Group’s internet, and is also available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five (5) years.

#### **Our Commitment**

In fulfilling its mission, State Group strives to treat all individuals in a manner that allows them to maintain their dignity and independence. State Group promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. State Group seeks to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the AODA. This Accessibility Policy and Multi-Year Accessibility Plan sets out State Group’s policy on how it achieves accessibility generally, as well as in employment, and information and communications. Under the IASR, the following accessibility strategies set out the requirements that are applicable to State Group:

- Workplace Emergency Response Information;
- Training;
- Information and Communication; and,
- Employment.

#### **Customer Service Standards**

State Group is committed to providing products and services in a way that respects the dignity and independence of people with disabilities. State Group has as an Accessible Customer Service Policy that addresses the AODA’s specific standards for accessible customer service. A copy of this Policy may be accessed on our website at [www.stategroup.com](http://www.stategroup.com).

#### **Integrated Accessibility Standards Regulations (IASR)**

The following sets out how State Group is committed to complying with the IASR.

##### Workplace Emergency Response Information

Where State Group is aware that an Employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the Employee as soon as practicable if such information is necessary given the nature of the Employee’s disability.

Such measures could include:

- individualized workplace emergency response information developed for Employees with disabilities, as required;
- individualized emergency plan to be communicated to the Employee's respective manager on an 'as needed' basis; and,
- on an ongoing and regular basis, and as per the applicable terms of the IASR, State Group will review and assess individualized emergency plans to ensure accessibility issues are addressed.

#### Accessible Emergency Information

State Group is also committed to providing all customers and clients with publicly available emergency information in an accessible way upon request.

#### *Training*

State Group is committed to providing training on the requirements of the accessibility standards referred to in the IASR and on the Ontario *Human Rights Code*, as it pertains to persons with disabilities.

In accordance with the IASR, State Group:

- determines and ensures that appropriate training on the requirements of the IASR and on the Ontario *Human Rights Code* as it pertains to persons with disabilities, is provided to all employees and persons providing services on behalf of State Group in the Province of Ontario, as well as all persons participating in the development and approval of State Group's policies;
- ensures that the training is provided to persons referenced above as soon as practicable;
- keeps and maintains a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided; and,
- ensures that training is provided on any changes to State Group's policies on an ongoing basis.

#### Information and Communication

State Group is committed to making company information and communications accessible to persons with disabilities. State Group incorporates new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

In accordance with the IASR, State Group:

- ensures that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
  - provides or arranges for the provision of such accessible formats and communication supports;
  - consults with the person making the request to determine the suitability of the accessible format or communication support;
  - provides or arranges for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and,
- notifies the public about the availability of accessible formats and communication supports.

### *Accessible Websites and Web Content*

The State Group's website and all content on the website conforms with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, subject to any exceptions set out in the IASR.

### Employment

#### ***Recruitment, assessment, and selection***

State Group is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle. In accordance with the IASR, State Group does the following:

State Group notifies employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This includes:

- ongoing review and, as necessary, modification of existing recruitment policies, procedures and processes; and,
- specifying that accommodation is available for applicants with disabilities, on State Group's website and on job postings.

State Group notifies job applicants, when they are individually selected to participate in an assessment or selection process and informs them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. If a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that considers the applicant's accessibility needs due to the disability.

#### ***Notice to Successful Applicants***

When making offers of employment, State Group notifies the successful applicant of its policies for accommodating employees with disabilities. This includes notification of State Group's policies on accommodating employees with disabilities in offer of employment letters.

#### ***Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports***

In accordance with the IASR, State Group informs its employees and new hires of policies that support employees with disabilities. This includes:

- informing current employees and new hires of State Group's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, providing or arranging for provision of suitable accessible formats and communications supports for:
  - information that is needed in order to perform the employee's job;
  - information that is generally available to employees in the workplace; and,
- in meeting the obligations to provide the information that is set out above, consulting with the requesting employee in determining the suitability of an accessible format or communication support.

### ***Documented Individual Accommodation Plans/Return to Work Process***

State Group incorporates accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable. State Group' existing policies and practices include steps that State Group will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

State Group reviews and assesses existing policies to ensure that they include a process for the development of documented individual accommodation plans for Associates with disabilities, if such plans are required. In accordance with the provisions of the IASR, State Group ensures that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which State Group can request an evaluation by an outside medical or other expert, at State Group' expense, to assist State Group in determining if and how accommodation can be achieved;
- the manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial if an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;

The following will be included if individual accommodation plans are established:

- any individualized emergency response information that is required
- any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
  - information that is needed in order to perform the employee's job;
  - information that is generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee;

State Group's return to work process as set out in its policies outlines:

- the steps it will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

### ***Performance Management, Career Development and Redeployment***

State Group takes 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;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

In accordance with the IASR, State Group:

- reviews, assesses and, as necessary, modifies existing policies, procedures and practices to ensure compliance with the IASR;
- takes the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance;
  - managing career development and advancement; or,
  - redeployment is required.
- reviews, assesses and, as necessary, includes in performance management workshops, accessibility criteria;
- takes into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and,
- takes into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

**Information and Feedback**

For more information on this accessibility plan or to provide feedback, please contact Debbie Roberts by email at [d.roberts@stategroup.com](mailto:d.roberts@stategroup.com) or by phone at 859-550-3321.

**Note:** Accessible formats of this document are available free upon request.

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