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SDI Canada Accessibility Policy – HR 003

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1) Purpose

The purpose of this policy is to support the global initiative of providing accessibility for people with disabilities. Our goal is to bring the issue of accessibility to the front of the minds of all employees. In compliance with the Accessibility for Ontarians with Disabilities Act (AODA), SDI is committed to providing accessibility in each of the following areas and integrated standards where applicable:

- customer service
- information and communication
- employment
- transportation
- the built environment

2) Policy Statement

At SDI, we believe in doing business ethically, honestly, and in full compliance with all laws and regulations. Our commitment to doing business the right way is part of what makes us SDI.

Laws, regulations, and our internally established processes, require SDI to have a workplace that is accessible to all persons, and in which all individuals are treated with respect and dignity. It is our policy, to treat all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity and are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

Consequences for failing to follow this process include legislative non-compliance, increased liability for SDI, and reputational problems for the Company due to potential discrimination claims.

3) **Scope**

This policy applies to all internal and external employees, consultants, and managers of SDI. As an employee, you are expected to read, understand and comply with this policy at all times.

Due to its provincial jurisdiction, the scope of the 'Integrated Standard for the Built Environment' is only applicable to SDI in the province of Ontario. Additionally, as SDI is a privately-owned organization, the 'Integrated Standard for Transportation' does not apply.

Systems, employees and processes will be periodically reviewed to ensure they are in compliance with this policy. Any employee found to have violated this policy may be subject to disciplinary action, up to and including dismissal.

4) **Definitions**

For the purposes of this policy the following definitions shall apply:

Accessibility: refers to the design of products, devices, services, or environments for people with disabilities.

Disability: under the AODA, the legal definition of disability pertains to any of the following:

- 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, an degree of paralysis, amputation, lack of physical coordination, 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
- a condition of mental impairment or a developmental disability
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the applicable provincial workplace safety and insurance legislation

Duty to Accommodate: when a person with a disability makes a request, employers must make accommodations to allow people with disabilities to equally benefit from and take part in services or the

workplace. This includes requests from employees, volunteers, customers, and clients. This must be done to the point of undue hardship.

Undue Hardship: employers must reasonably accommodate workers up to the point of “undue hardship”. This means that there must be excessive and substantial disruption or interference with the employer’s operation before they can claim undue hardship. Undue hardship does not mean minor inconvenience or interference, or minor cost.

Standard: regulations under the AODA that set forth requirements in which employers must meet in providing accessibility in five key areas, or standards. The five standards are customer service, information and communication, employment, transportation, and the built environment.

5) Overview

This section will outline the various components of the SDI Accessibility Policy.

A) Standard for Customer Service

SDI is committed to excellence in serving all customers including people with disabilities. All employees are required to complete SDI’s Accessibility Customer Service Training during their onboarding orientation. Training will be provided to employees, volunteers and others who deal with the public or other third parties on their behalf. Training includes:

- an overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standards
- SDI Marketing’s accessible customer service plan & policy
- how to interact and communicate with people with various types of disabilities ○ employees will communicate with people with disabilities in ways that take into account their disability
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person ○ all staff must be trained and familiar with various assistive devices that may be used by customer with disabilities with accessing our good and services
 - employees must welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public
 - a person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises
- how to use the equipment or devices available on-site or otherwise that may help with providing goods or services to people with disabilities; and
- what to do if a person with a disability is having difficulty in accessing SDI Marketing’s (client) goods and services.

Staff will also be trained when changes are made to SDI’s accessible customer service plan & policy.

B) Integrated Standards for Information & Communications

SDI is committed to making company information and communications accessible to people with disabilities. The information we provide and the ways we communicate are key to delivering our programs and services to our clients and consumers.

We are committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary upon request.

SDI will strive to incorporate new accessibility requirements under the information and communication standard by the compliance deadline to ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of persons with disabilities. SDI will strive to provide the necessary communication supports in a timely manner.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, SDI will notify customers promptly. This notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. This notice will be placed at the SDI office at reception and available for viewing on the SDI website.

Feedback Process

Employees and customers who wish to provide feedback on the way SDI provides goods and services to people with disabilities can contact the Human Resources Department. Customers can expect to hear back within 24 hours.

Complaints will be addressed according to our organization's regular complaint management procedures.

Emergency Response Information Plan

SDI is committed to providing employees with disabilities with individualized emergency response information when necessary upon request. If an employee requires assistance, he or she must inform Human Resources by following SDI's process for requesting an Individualized Accommodation Plan.

- employee requests an Individualized Accommodation Plan by informing both Manager and Human Resources
- the Employee will be required to go through SDI's Individualized Accommodation Plan process
- once approved, the Manager and/or Human Resources will notify the Area Fire Warden o the Area Fire Warden must provide the following forms to the Chief Fire Warden: i) Occupant Information Form – Notice to Area Warden; ii) list of Persons Requiring Assistance. These forms will be reviewed every quarter, or as necessary
- the Area Fire Warden will forward the forms to the Chief Fire Warden so that these details will be updated in their record of the Fire Safety Plan

C) Integrated Standards for Employment

SDI is committed to fair and accessible employment practices that attract and retain talented employees with disabilities. SDI is committed to providing accessibility to employees and/or applicants with disabilities when necessary upon request. This standard is broken down in the following areas:

Accessible Recruitment Process

SDI reviews its policies and procedures on an annual basis. This ensures the content remains accurate and current, but also ensures those responsible for recruiting identify any barriers and implement actions to remove those.

Our ongoing activities include:

- ensuring our careers section on the corporate website maintains a notice that accommodation is available upon request
- ensuring our candidates are kept informed about the availability of accommodations: i) when contacted for an interview, ii) during the selection process, and iii) when offered a job (during the employee onboarding stage)
- providing training to all employees involved with the recruitment and selection process, including when processes and/or accessibility requirements change

Support Information for Employees

SDI strives to provide support information for employees in an accessible format that takes into the needs of the employee's disability, when necessary upon request.

Employees that require job accommodation due to a disability should contact Human Resources at accessibility@sdimktg.com. Human Resources will consult with the employee to provide or arrange for provision of accessible formats and communication supports for:

- information that is needed in order to perform the employee's job
- information that is generally available to employees in the workplace

All employees will be required to follow the Request for Accommodation process, outlined below.

Individual Accommodation Plans

SDI is committed to providing employees with disabilities with individualized accommodation plans when necessary upon request. If an employee requires assistance, he or she can follow the Request for Accommodation process below:

- employees can request for assistance by informing their Manager and Human Resources. If a Manager notices that an employee needs accommodation, the Manager should discuss accommodation measures with the employee.
- Human Resources will gather relevant details and assess needs. The employee actively participates in this step by providing Human Resources with details on his/her disability. Human Resources can request medical reports, if required. Human Resources may ask for a functional capacity assessment, in which SDI will cover the cost.
- the employee and Human Resources will find the most appropriate accommodation measure. If accommodation is denied, the reason is provided.
- once approved, Human Resources will write a formal individual accommodation plan, which includes:
 - accessible formats and communication support, if requested
 - workplace emergency response information, if requested
 - any other accommodation that is to be provided
- the employee and Manager will review the accommodation to ensure that it has effectively met the need. Human Resources will formally review the individual accommodation plan:
 - if the employee's work location or position changes
 - if the nature of the employee's disability changes
 - otherwise, it will be reviewed annually

Performance Management, Professional Development, and Redeployment

SDI strives to meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities in the areas of performance management, professional development, and redeployment. SDI will take the accessibility needs of

employees with disabilities and their individualized accommodation plans into account, in the following areas:

- when assessing and managing their performance
- in managing their professional development and advancement
- when redeploying them

SDI will review and, where necessary, revise its performance review policies or procedures, take into account the accessibility needs of employees with disabilities when providing professional development and advancement to its employees with disabilities, and take into account the accessibility needs of employees with disabilities when redeploying employees.

D) Integrated Standards for Transportation

This standard does not apply to private organizations and as such, will not apply to SDI and our business practices.

E) Integrated Standards for the Built Environment

SDI is committed to complying with the by-laws and regulations set forth in the integrated standard for the Built Environment within its jurisdiction in Ontario. As such, this policy is only applicable to SDI projects in Ontario. All employees and contractors when performing related work in Ontario are expected to comply with this policy, which is further classified below:

Buildings

SDI is committed to greater accessibility in, out of, and around the buildings we use in office and for our executed programs and events. When required by law in Ontario, SDI will ensure that facilities incorporate the standards and requirements set forth in the amended Ontario Building Code for barrier-free design as existing spaces are renovated and/or new spaces are obtained.

Design of Public Spaces

SDI is committed to greater accessibility in, the design of public spaces that we use for our executed programs and events. When required by law, and when SDI has the authority or approval to build on or make planned significant changes to the public space, we will ensure that the public spaces in which our events and programs are executed on incorporate the standards for barrier-free design.

F) Multi-Year Accessibility Plan

SDI has created a Multi-Year Accessibility Plan which outlines our five-year plan to achieve accessibility in each of the five standards as outlined in the AODA. A copy of this plan will be posted on the corporate website. This plan will be reviewed both every five years or as needed.

6) Responsibilities

This policy applies to all employees and members of SDI management. Everyone is expected to uphold this policy and associated process. Employees will be held accountable by SDI should this policy be violated.

All employees are required to participate in both SDI's Accessibility Customer Service Training and Integrated Accessibility Standards Training, during their new hire onboarding orientation. In addition, all employees are expected to comply with the applicable duties outlined in SDI's Multi-Year Accessibility Plan and comply with the Human Rights Code and the AODA at all times without exception.

Employer

As the employer SDI, including its Divisional VPs / Executives is required to:

- Complete legislative Accessibility Training and adhere to SDI's Accessibility Policy
- Comply with Human Rights Code and AODA standards as outlined in the AODA.
- Take every reasonable means necessary to accommodate persons with disabilities
- Ensure all employees are trained on the Human Rights Code and the AODA, particularly with respect to accommodating persons with disabilities
- Provide accessible formats and communication supports in all feedback processes, upon request
- Notify the public that accessible feedback processes are available
- Provide accessible workplace information (including information about emergency workplace procedures) to employees with disabilities
- Ensure HR practices explicitly considers accessibility issues in workplace recruitment, accommodation, performance management, training, career development and return-to-work processes
- Understand this policy and help to promote it internally
- Read, understand and signoff on this policy during the employee annual policy review cycle

Human Resources Department

The HR Department is required to:

- Develop and implement SDI's Accessibility Policy that complies with the Human Rights Code and AODA standards as outlined in the AODA.
- Ensure all employees have received SDI's Accessibility Training & adheres to SDI's Accessibility Policy, the Human Rights Code and the AODA, particularly with respect to accommodating persons with disabilities
- Ensure HR practices that explicitly considers accessibility issues in workplace recruitment, accommodation, performance management, training, career development and return-to-work processes. Examples include:
 - Notifying candidates that accommodation during the recruitment process is available and arranging for such accommodation upon request
 - Notifying successful candidates of SDI's accommodation policy when an offer of employment is made
 - Being cognizant of the accessibility needs of employees with disabilities when managing employee performance or considering the promotion of the employee
 - Developing written individualized accommodation plans and return-to-work processes for employees with disabilities.
- Understand this policy and help to promote it internally
- Review and update this policy during the annual policy owner review cycle.
- Read, understand and signoff on this policy during the employee annual policy review cycle.

Manager/Supervisor

Managers and supervisors are required to:

- Complete Legislative Accessibility Training and adhere to SDI's Accessibility Policy
- Comply with Human Rights Code and AODA standards as outlined in the AODA.
- Comply with HR practices that explicitly considers accessibility issues including but not limited to: workplace recruitment, accommodation, performance management, training, career development and return-to-work processes. Examples include:
 - Notifying candidates that accommodation during the recruitment process is available and arranging for such accommodation upon request
 - Notifying successful candidates of SDI's accommodation policy when an offer of employment is made

- Being cognizant of the accessibility needs of employees with disabilities when managing employee performance or considering the promotion of the employee
- Supporting the Human Resources Department in developing written individualized accommodation plans and return-to-work processes for employees with disabilities.
- Ensure all employees have received SDI's Accessibility Training & adheres to SDI's Accessibility Policy, the Human Rights Code and the AODA, particularly with respect to accommodating persons with disabilities
- Confidently serve customers with disabilities
- Interact and communicate with people with various types of disabilities
- Interact with people with disabilities who use assistive devices
- Interact with people with disabilities who require the assistance of a service animal
- Interact with people with disabilities who require a support person
- Report accommodation requests immediately to your manager and the Human Resources Department
- Understand this policy and help to promote it internally
- Read, understand and signoff on this policy during the employee annual policy review cycle.

Employees

Employees are required to:

- Complete Legislative Accessibility Training and adhere to SDI's Accessibility Policy
- Comply with Human Rights Code and AODA standards as outlined in the AODA.
- Comply with HR practices that explicitly considers accessibility issues including but not limited to: workplace recruitment, accommodation, performance management, training, career development and return-to-work processes
- Ensure all employees have received SDI's Accessibility Training & adheres to SDI's Accessibility Policy, the Human Rights Code and the AODA, particularly with respect to accommodating persons with disabilities
- Confidently serve customers with disabilities
- Interact and communicate with people with various types of disabilities
- Interact with people with disabilities who use assistive devices
- Interact with people with disabilities who require the assistance of a service animal
- Interact with people with disabilities who require a support person
- Report accommodation requests immediately to your manager and the Human Resources Department
- Understand this policy and help to promote it internally
- Read, understand and signoff on this policy during the employee annual policy review cycle.

7) Escalations, Exceptions, Questions

Escalations: if you are aware of an employee violating this policy, have noticed a defect or inaccuracy with this policy, or need to escalate a matter regarding accommodating persons with disabilities, please advise the Human Resources Department.

Exceptions: as this policy is aimed at complying with the Human Rights Code and the AODA, the only current management approved exceptions, is if the duty to accommodate creates an undue hardship which is a situation where severe negative effects outweigh the benefit of providing accommodation. Any exception must be approved by the Human Resources Department and Company Shareholders.

Questions: if at any time you have a question about this policy, please speak with the Human Resources Department.

8) Training

SDI is committed to implementing processes for ensuring that all employees, volunteers, and other persons who deal with customers and the public on SDI's behalf, and persons participating in the development and approval of our policies, practices and procedures receive the appropriate training that meets the requirements under the Integrated Regulation.

All employees are provided with Accessibility training at the time of their new hire onboarding orientation, or as soon as practicable. The Accessibility training covers the following areas: i) accessibility customer service; ii) accessibility integrated standards, as it pertains to the employee's role; and iii) Ontario Human Rights Code as it pertains to persons with disabilities.

In addition, all employees will be required to review this policy and submit an electronic acknowledgement of their understanding and conformance to the policy requirements annually. Notices for annual review and acknowledgements are sent to employees via email. The acknowledgement will be tracked internally and retained in a central repository for 3 years after the record creation date.

9) Record Keeping

SDI must keep certain records and have appropriate internal controls in place which will evidence our adherence to this policy.

All trainings can be found on Salesforce ☞ Employee Resources ☞ Training Calendar, and are listed as SDI Integrated Accessibility Standards Training, and SDI Accessibility Customer Service Training. Return-to-Work and Accommodation Plans can be found under Employee's personal file.

Internal testing results against this policy and related reports are to be classified as 'Confidential' according to the ***SDI Compliance Testing Policy – LE 005*** and retained in the access-controlled repository for a period of 6 years. The Regulatory Compliance Manager is responsible for access rights to the controlled repository for internal testing/results. Any request for access to this repository must be submitted directly to the Regulatory Compliance Manager and are retained for 3 years from the date of the request.

10) Related Policies & Documents

The following policies and documents are used, or may be referred to, as part of this policy. Please note documents related to this policy are reviewed annually in conjunction with the policy review cycle. Templates are reviewed on an ad hoc basis.

SDI Records Retention Policy: outlines the records retention program within SDI. The policy breaks down the main types of documents by business area and provides minimum retention periods for each document. It also introduces the idea of legal hold orders which suspend normal retention periods. To view this policy, first log into Salesforce and [click here](#).

SDI Compliance Testing Policy: outlines the testing program used internally within SDI to assess compliance to policies, contracts and regulatory obligations. It speaks to elements of the testing program and forms a key part to the overall compliance program at SDI. To view this policy, first log into Salesforce and [click here](#).

SDI Data Classification & Handling Policy: outlines how information should be classified and handled during its lifecycle within SDI. This includes corporate information, employee information and Client information. It outlines 4 categories of information and appropriate handling instructions for each. To view this policy, first log into Salesforce and [click here](#).

SDI Health & Safety Policy: outlines the internal program SDI has established to promote health and safety for our employees, while also implementing legislated requirements. This includes role responsibilities, health and safety committee responsibilities, both in office and at field events. To view this policy, first log into Salesforce and [click here](#).

SDI Prevention of Workplace Violence & and Harassment Policy: establishes a formal complaint and investigation process for persons wishing to complain of this behaviour. It outlines steps of the complaint process, steps in the investigation, and process responsibilities. To view this policy, first log into Salesforce and [click here](#).

SDI Emergency Procedures: outlines what the emergency procedures are for the SDI Toronto office. Specifically, it documents emergency exits, location of fire extinguishers, location of first-aid kits, and what to do in an emergency situation. To view this policy, please use the following link to connect to the file on the 'S' drive: S:\Training and Development\Canada and US\Internal Trainings\Legislative Trainings\Occupational Health and Safety\Handouts.

11) **Policy Retention & Review Cycle**

All copies of this policy are housed within Salesforce, in the 'Corporate Policy' section, 'Policies' tab. This policy has an annual review cycle, which is tracked and documented within Salesforce.

12) **Review and Revision Summary**

Reviewer	Version Reviewed	Next Review Date	Notes
General Manager	Version 3 (January 2021)	January 2022	<ul style="list-style-type: none"> • Updated formatting of accessible recruitment process
General Manager	Version 3 (Dec 2019)	December 2020	<ul style="list-style-type: none"> • No changes made/required
General Manager	Version 3 (Dec 2018)	December 2019	<ul style="list-style-type: none"> • No substantive updates made/required
General Manager	Version 3 (Dec 2017)	December 2018	<ul style="list-style-type: none"> • Updated header with classification & retention
General Manager	Version 2 (Dec 2016)	December 2017	<ul style="list-style-type: none"> • Added applicability • Minor changes to s.6 and s.7 • Changed reviewer
HR Director	Version 1 (Jun 2015)	December 2015	Initial draft