

DANIELS MULTI-YEAR ACCESSIBILITY PLAN

THE DANIELS CORPORATION – DECEMBER 2017

20 Queen St West, Suite 3400, Toronto, ON.

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Introduction and Statement of Commitment

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act* (the “AODA”). The AODA requires that effective January 1, 2014, The Daniels Corporation (“Daniels”) establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements of the Integrated Accessibility Standards (the “IAS”).

This multi-year accessibility plan (the “Accessibility Plan”) outlines Daniels’ strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS in order that Daniels may fulfill its commitment as outlined in the Daniels’ Integrated Accessibility Standards Policy for Ontario, Canada (the “Policy”).

General Accessibility Standards

Requirement	Responsible Department	Action	Status
<p>Accessibility Policy</p> <p>Develop, implement and maintain polices governing how Daniels achieves or will achieve accessibility through meeting the requirements of the IAS.</p> <p>Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.</p> <p>Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.</p>	<p>-People and Culture</p>	<p>-Policy complete and posted on Daniels’ website and Intranet</p>	<p>-Complete</p>

<p>Multi-Year Accessibility Plan</p> <p>Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation</p> <p>Post the accessibility plan on the website and provide the plan in an accessible format upon request.</p> <p>Review and update the accessibility plan at least once every five years.</p>	<p>-People and Culture, Marketing and Communications and Development</p>	<p>-Plan created and posted on Daniels' website and Intranet</p>	<p>-Complete</p>
<p>Training</p> <p>Provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.</p> <p>Training must include:</p> <ul style="list-style-type: none"> i. the requirements of the IAS; the <i>Human Rights Code</i> as it pertains to persons with disabilities; and ii. the AODA Policies as required by the IAS. <p>Keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.</p> <p>Ensure that contractors providing goods, services and/or facilities on its behalf have received the training required under the IAS.</p>	<p>-People and Culture and Health and Safety</p>	<p>-Engage Thompson, Roach and Hughes Consulting Inc. to develop training program to educate all employees on AODA legislation, ISAR and <i>Human Rights Code</i></p> <p>-Training will be mandatory for all employees as well as contractors providing goods and services on behalf of Daniels</p>	<p>-Complete</p>

		-Track and monitor training	
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Information and Communication Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Emergency Plans, Procedures or Public Safety Information</p> <p>Provide any emergency plans, procedures or public safety information made available to the public in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request.</p>	-Customer Care and Sales Administration	-Provide related information in Accessible Format as soon as practicable	-Ongoing
<p>Feedback</p> <p>Ensure 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 Communications Supports, upon request.</p> <p>Notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures</p>	-Customer Care, Sales Administration and People and Culture	<p>-Continually review current process to ensure Daniels is doing their best to ensure individual needs and accommodations are met</p> <p>-Communicated on our website</p>	<p>-Ongoing</p> <p>-Complete</p>

<p>Accessible Formats and Communication Supports</p> <p>Upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.</p> <p>Provide Accessible Formats and Communication Supports in a timely manner at a cost that is no more than the regular cost charged to other persons and in a manner that takes account the person’s accessibility needs due to disability.</p> <p>Consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and notify the public of the availability of same.</p>	<p>-Customer Care and Sales Administration</p>	<p>-Continually review current process to ensure Daniels is doing their best to ensure individual needs and accommodations are met</p>	<p>-Ongoing</p>
<p>Accessible Websites and Web Content</p> <p>Ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.</p> <p>By January 1, 2021 ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.</p>	<p>-Marketing Communications</p>	<p>-Review current Website and content with independent consultant to determine action plan for compliance</p> <p>Work with Web Developer on a schedule for compliance by January 1, 2021.</p>	<p>-Complete</p> <p>-In Progress</p>

Employment Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Recruitment</p> <p>Notify the public and employees about the availability of accommodation for applicants with disabilities in its recruitment processes</p>	<p>-People and Culture</p>	<p>-Incorporate language on postings and website to make internal and external applicants aware of the availability of accommodation</p>	<p>-Complete</p>
<p>Recruitment, assessment or selection process</p> <p>Notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>Consult with an applicant requesting accommodation to 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</p>		<p>-Language on accommodation will be included in postings</p> <p>-Educate all hiring managers on AODA, Human Rights and the accommodation process during recruitment, assessment and selection</p>	<p>-Complete</p>
<p>Notice to successful applicants</p>			<p>-Complete</p>

<p>Notify successful applicants of Daniels’s policies for accommodating employees with disabilities.</p>	<p>-People and Culture</p>	<p>-Incorporate into Employment Agreement</p>	
<p>Informing employees of supports</p> <p>Inform employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.</p> <p>Provided to new employees as soon as practicable after commencing employment</p> <p>Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities</p>	<p>-People and Culture</p>	<p>-Communicate policy and procedures to Daniels’ employees</p> <p>-Ensure all new hires have required AODA training</p> <p>-Ensure all new hires review the Integrated Accessibility Standards Policy</p>	<p>-Complete</p> <p>-Ongoing</p>
<p>Accessible Formats and Communication Supports for employees</p> <p>Upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.</p> <p>Consult with the employee making the request to determine the</p>	<p>-People and Culture</p>	<p>-Educate employees (including Managers) on the availability of accessible formats and communication</p>	<p>-Complete</p>

<p>suitability of any Accessible Format or Communication Support. However, where the needs of an employee with a disability may be accommodated in various ways, Daniels reserves the right to determine the type Accessible Format or Communication Support that will be provided in the circumstances.</p>		<p>supports for employees</p>	
<p>Workplace emergency response information</p> <p>Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Daniels is aware of the need for accommodation due to the employee’s disability.</p> <p>Provide this information as soon as practicable after becoming aware of the need for accommodation.</p> <p>With the consent of the employee, provide the workplace emergency response information to the person designated by Daniels to provide assistance to the employee if the employee needs assistance by reason of disability</p> <p>Review individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee’s overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.</p>	<p>-People and Culture and Health and Safety</p>	<p>-Establish a process to provide employees who request accommodation to receive individualized workplace emergency response information</p> <p>-Communicate process to all employees as part of the Integrated Accessibility Standards Policy</p>	<p>-Complete</p>
<p>Documented individual accommodation plans</p> <p>Have in place a written process for the development of documented individual accommodation plans for employees</p>		<p>-Create an Individual Accommodation</p>	<p>-Complete</p>

<p>with disabilities. The process must include the following elements:</p> <ul style="list-style-type: none"> i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. ii. The means by which the employee is assessed on an individual basis. iii. The manner in which Daniels can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved. iv. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. v. The steps Daniels will take to protect the privacy of the employee's personal information. vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 		<p>and Return to Work Policy incorporating the AODA elements needed</p> <p>-Educate Managers on the Individual Accommodation and Return to Work Policy and Procedures</p>	
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<p>vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> <p>Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.</p> <p>Where required, an employee's individual accommodation plan will include individualized workplace emergency response information.</p>			
<p>Return to Work Process</p> <p>Have in place a documented a return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.</p>	<p>-People and Culture</p>	<p>- Create an Individual Accommodation and Return to Work Policy incorporating the AODA elements needed</p> <p>-Educate Managers on the Individual Accommodation and Return to Work Policy and Procedures</p>	

<p>The return to work process must outline the steps Daniels will take to facilitate the employee's return to work and will include documented individual accommodation plans as part of the process</p>		<p>-Create an Individual Accommodation Plan / Return to Work Plan to assist with outlining the steps Daniels will take with the return to work process</p>	<p>-Complete</p>
<p>Performance management</p> <p>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.</p>	<p>-People and Culture</p>	<p>-Ensure accessibility needs and individual accommodation plans are taken into account during the performance management process</p> <p>-Ensure any new or updated performance management processes incorporate accessibility features</p>	<p>-Ongoing</p>

<p>Career development and advancement</p> <p>Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans when providing career development and advancement to employees with disabilities.</p>		<p>-Ensure accessibility needs and individual accommodation plans are taken into account when providing career development and advancement</p>	<p>-Ongoing</p>
<p>Redeployment</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	<p>- Managers and People and Culture</p>	<p>-Ensure accessibility needs and individual accommodation plans are taken into account during redeployment</p>	<p>-Ongoing</p>

DESIGN OF PUBLIC SPACES

(The following requirements only apply to public spaces that are newly constructed or redeveloped on and after January 1, 2017.)

Description	Responsible Individual/Department	Action	Status
<p>Recreational Trails and Beach Access Routes</p> <p>Ensure that recreational trails and beach access routes which Daniels newly constructs or redevelops or intends to maintain meet the technical accessibility requirements in the Design of Public Spaces</p>	<p>-Development, Implementation and Sales and Marketing</p>	<p>-Engage Architects, Landscape Architects, Civil Engineers and Code Consultant to ensure that recreational trails and</p>	<p>-Ongoing</p>

		beach access routes which Daniels newly constructs or redevelops or intends to maintain meet the technical accessibility requirements of AODA	
<p>Outdoor Public Use Eating Areas</p> <p>Ensure that outdoor public use eating areas which Daniels newly constructs or redevelops or intends to maintain meet the technical accessibility requirements in the Design of Public Spaces</p>	-Development and Implementation	-Engage Architects, Landscape Architects, Civil Engineers and Code Consultant to ensure that outdoor public use eating areas which Daniels newly constructs or redevelops or intends to maintain meet the technical accessibility requirements of AODA	-Ongoing
<p>Outdoor Play Spaces</p> <p>Ensure that outdoor play spaces which Daniels newly constructs or redevelops or intends to maintain meet the technical accessibility requirements in the Design of Public Spaces</p>	-Development and Implementation	-Engage Architects, Landscape Architects, Civil Engineers and Code Consultant to ensure that outdoor play spaces which Daniels newly constructs or	-Ongoing

		redevelops or intends to maintain meet the technical accessibility requirements of AODA	
<p>Exterior Paths of Travel</p> <p>Ensure that any exterior paths of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Spaces Standards.</p>	-Development and Implementation	-Engage Architects, Landscape Architects, Civil Engineers and Code Consultant to ensure that any exterior paths of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps that Daniels constructs or redevelops and intends to maintain meet the technical accessibility requirements of AODA	-Ongoing
<p>Off and On Street Parking</p> <p>Ensure that when Daniels constructs new or redevelops off-street parking facilities that it intends to maintain, the off and on street parking facilities meet the requirements of the Design of Public Spaces Standards.</p>	-Development	-Engage Architects, Landscape Architects, Civil Engineers, Traffic/Transportation Consultants and Code Consultant to ensure	-Ongoing

		that any new or redeveloped off-street parking facilities that Daniels intends to maintain, meet the requirements of the Design of Public Spaces Standards	
<p>Obtaining Services</p> <p>Ensure that Daniels meets the requirements of the Design of Public Spaces Standards in respect of the following:</p> <ol style="list-style-type: none"> 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas. 	-Implementation	-Engage Architects, Interior Designers and Code Consultant to ensure that any new service counters and fixed queuing guides and or all newly constructed or redeveloped waiting areas meet the design requirements of the Design of Public Spaces Standards	-Ongoing

<p>Maintenance</p> <p>Ensure accessibility plans include:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces. 2. Procedures for dealing with temporary disruptions when accessible elements required are not in working order. 	<p>-Daniels Property Managers</p>	<p>-Daniels is responsible for being aware of all the accessible elements at the properties they manage, to make the boards or property owners aware of any preventative or scheduled maintenance, and upon approval of the board or owner, engage in such maintenance. The Property Managers shall create an appropriate response to manage emergency repairs for accessible elements to be presented to the board or owners for approval.</p>	<p>-Ongoing</p>
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