

Enterprise Accessibility Policy

Policy Sponsor: CPO, Pension and CHRO, Human Resources

Summary: Sets forth the principles for how OMERS Enterprise provides services to and otherwise interacts with people with disabilities.

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1. COMMITMENT TO SERVICE FOR PEOPLE WITH DISABILITIES

OMERS Enterprise strives at all times to provide its services in a way that respects the dignity and independence of people with disabilities. We are committed to giving people with disabilities the same opportunity to access our business and services in the same place and in a similar way as others. In Ontario, this policy forms part of our framework to fully comply with the standards developed under the *Accessibility for Ontarians with Disabilities Act* (“AODA”) (see Appendix ‘A’, Multi-Year Accessibility Plan).

2. DEFINITIONS

“assistive device” means a tool, technology or other mechanism that enables a person with a disability to perform everyday tasks and activities such as moving, communicating or lifting.

“Customer” means a member of the public.

“disability” means,

- (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) a workplace injury or disability for which benefits were claimed or received under the provincial Workers Compensation program.

"Members" means members of the OMERS pension plans and includes survivors and beneficiaries receiving benefits from OMERS.

"service animal" is an animal used by a person with a disability and for which it is either (i) readily apparent that it is used for that purpose or (ii) for which the person has a letter from a physician or nurse verifying that the animal is required for reasons relating to his or her disability.

"support person" means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

3. PROVIDING SERVICES TO PEOPLE WITH DISABILITIES

3.1 Communication

We will communicate with people with disabilities in ways that take into account their disability and allow them to communicate effectively for the purpose of receiving and requesting our services. For example, OMERS Client Services will, on request, communicate with Members via teletypewriter (TTY), e-mail, or large-font communication.

If any employee receives a request from a disabled person, the employee should make all reasonable efforts to accommodate the request. Should the employee not be able to accommodate the request, the issue must be brought to the attention of the employee's manager in order that the concern is addressed appropriately.

3.2 Assistive Devices

We will make reasonable efforts to accommodate assistive devices. A person with a disability may use his or her own personal assistive device for accessing our services or meeting with our representatives in Ontario.

It is the responsibility of the person to ensure that his or her assistive device is operated in a safe and controlled manner at all times. Where a person's assistive device poses a health or safety risk to him/herself or others on our premises, he or she may be asked to use an alternative means for accessing services (and we will work with him or her to find a reasonable alternative).

3.3 Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and to the extent permitted by law.

Service animals are not permitted if they are otherwise excluded by law, in which case we will make all reasonable efforts to provide appropriate substitute services to the person. It is the responsibility of the person to ensure that his or her service animal is under his or her control at all times.

3.4 Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

4. NOTICE OF TEMPORARY DISRUPTIONS

Customers:

In the event of a planned or unexpected disruption to services or facilities for Customers with disabilities in Ontario, we will notify Customers promptly by posting a notice. This clearly posted 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.

The notice will be placed at all impacted locations in advance of the disruption if possible. We will ensure that all employees who are affected by this temporary disruption will be notified.

Members:

Notice will be provided for all planned disruptions in OMERS Client Services and www.omers.com, and such disruptions will be scheduled so as to minimize any inconvenience to people with disabilities. Notice of a planned disruption in the OMERS Client Services telephone line will be placed on its outgoing message; notice of a planned disruption in www.omers.com will be placed in its announcements/notices section. Notice of any unexpected disruption in these services will be similarly provided, to the extent possible.

In the event of a disruption affecting the accessibility of information sessions held at off-site locations, notice will be provided to attendees and we will find reasonable alternatives for affected persons as needed on a case by case basis.

5. WORKPLACE EMERGENCY RESPONSE

We will provide individualized workplace emergency response information and accommodation to disabled employees in Ontario if individualized information is necessary based on the type of disability and once we are aware of the need for accommodation.

5.1 Employee's Responsibilities

If an employee has a disability for which an individual emergency response plan may be beneficial, the employee should inform their manager or HR.

5.2 Manager's Responsibilities

If a manager is informed by an employee that the employee requires accommodation, the manager must inform HR so that an individualized emergency response plan can be created for the employee based on the employee's disability and unique workplace situation.

5.3 HR's Responsibilities

If HR is informed by an employee that the employee requires accommodation, they will work with the employee to create an individualized emergency response plan for the employee based on the type of disability.

5.4 Timing

We will provide the individualized information as soon as possible after becoming aware of the need for an accommodation.

5.5 Sharing Emergency Response Information

The workplace response information may be shared with the persons designated by us to provide assistance to the disabled employee, and the employee's manager, if the disabled employee consents.

5.6 Reviewing Emergency Response Information

Individualized workplace emergency response information must be reviewed by HR if:

- the disabled employee moves to a different work location in the organization;
- his or her overall accommodation needs or plans are reviewed; and
- when we review our general emergency response policies.

6. ACCESSIBILITY TRAINING

6.1 Ontario Employees

OMERS Enterprise will provide accessibility training to all Ontario employees who interact with Customers, Members or other third parties on its behalf. The type of training given will be targeted to the nature of the employee's interaction with third parties, for example, employees providing frontline Member services and those who participate in developing Member service policies, practices and procedures will receive more extensive training than other areas.

Training will also be provided to every person in Ontario who participates in developing our policies, practices and procedures governing the provision of services to Customers or other third parties.

Training will include the following topics:

- The purposes of AODA and the Human Rights Code as it pertains to persons with disabilities;
- 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 our services; and
- OMERS Enterprise Policies, practices and procedures relating to accessibility.

Training will be provided to new Ontario employees who interact with Customers, Members or other third parties on our behalf, as required, within three months of hire. Training will also be provided periodically in connection with changes to this Policy, and its related practices and procedures.

6.2 Agents

We will ensure that agents acting on our behalf when dealing with Customers in Ontario receive training in accordance with the Accessibility Standards for Customer Service regulations under the *Accessibility for Ontarians with Disabilities Act, 2005*.

7. FEEDBACK ABOUT THIS POLICY

Feedback on this Policy and on our provision of services to people with disabilities may be provided to:

- Michelle Banik, Vice President, Centres of Excellence, Human Resources
(416) 814-7121
mbanik@omers.com
or
- Paul Martiniello, Vice President, Client Management
(416) 369-2437
pmartiniello@omers.com

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Feedback will be reviewed and any complaints will be addressed as soon as is practical. An acknowledgment of feedback will be issued within seven business days. The acknowledgment will indicate how and when the matter will be addressed. We will follow up with any required action within the timeframe noted in the acknowledgement.

Employees with questions about this Policy should consult with their HR Business Partner.

HISTORY

Effective Date:	January 1, 2014
Approval Date:	October 5, 2011, September 5, 2012, December 19, 2013
Next Scheduled Date for Review:	December 2015

APPENDIX A: MULTI-YEAR ACCESSIBILITY PLAN

Training

OMERS Enterprise will continue to provide training to Ontario staff on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of staff members.

We will take the following steps to ensure staff is provided with the training needed to meet Ontario's accessible laws by **January 1, 2015**:

- Training about accessibility and the requirements set out under this Policy will be incorporated into our Enterprise Code of Conduct online training.
- All existing Enterprise employees, Consultants and Directors ("Individuals") will be required to complete this training in 2014.
- New Individuals will be required to complete the Enterprise Code of Conduct training within 30 days of their hire date.

Kiosks

Oxford will ensure that the needs of people with disabilities are considered when designing, procuring or acquiring self-service kiosks by **January 1, 2014**.

- We will consider technical and structural features of kiosks, as well as accessible paths to the kiosks.

Information and Communications

OMERS Enterprise is committed to meeting the communication needs of people with disabilities.

OMERS Enterprise will take the following steps to ensure existing feedback processes are accessible to people with disabilities in Ontario upon request by **January 1, 2015**:

- We will administer our feedback processes in accessible formats and make communication supports available upon request.

OMERS Enterprise will take the following steps to make sure all publically available information in Ontario is made accessible upon request by **January 1, 2016**:

- We will provide information and communications in accessible formats and with communication supports to people with disabilities upon request.
- Where people with disabilities request information and communications in accessible formats, including communications supports, this will be provided in a timely manner and at a cost equal to the regular cost charged to others, if any.

OMERS Enterprise will take the following steps to make all websites and content conform with WCAG 2.0, Level AA by **January 1, 2021**:

- We will ensure that all websites and web content, including web-based applications, that we control directly or indirectly through a contractual relationship that allows for modification of the product, meet the WCAG 2.0 Level AA standard.

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Employment

OMERS Enterprise is committed to fair and accessible employment practices.

We will take the following steps to notify the public and staff that, when requested, we will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- All recruitment is managed through the online Enterprise Applicant Tracking System. We will include a statement in the Applicant Tracking System to inform all applicants and employees that persons with disabilities will be accommodated throughout the recruitment and selection process and for the duration of employment with OMERS Enterprise.
- Successful candidates will be notified verbally of our policies for accommodating employees with disabilities when the offer of employment is made.

OMERS Enterprise will take the following steps by **January 1, 2016** to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees in Ontario that have been absent due to a disability:

- HR will develop a standard template for the development of individual accommodation plans and return-to-work programs.

We will take the following steps to ensure the accessibility needs of employees with disabilities in Ontario are taken into account in performance management, career development and redeployment processes:

- Employees with disabilities will have an individual accommodation plan developed by HR in consultation with the employee. The plan will include consideration for performance management, career development and redeployment processes.

Design of Public Spaces

Oxford will meet the Accessibility Standards for the Design of Public Space when building or making major modifications to public spaces in Ontario by **January 1, 2017**. 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
- Service-related elements like service counters, fixed queuing lines and waiting areas

Oxford will put procedures in place to prevent service disruptions to its accessible parts of its public spaces.

In the event of a service disruption to the accessible parts of public spaces, we will notify the public of the service disruption and alternatives available.

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For more information on this accessibility plan, please contact Michelle Banik, VP, Centres of Excellence, Human Resources at:

- Phone: (416) 814-7121
- Email: mbanik@omers.com

Accessible formats of this document are available free upon request from Glendy Huo, Manager, Design & Digital:

- Phone: (416) 369-2480
- Email: ghuo@omers.com