



Accessibility Policy

In Compliance with AODA O. Reg. 429/07,
O. Reg. 191/11 and O. Reg. 412/13

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Accessibility Policy

Policy – Purpose and Scope

This updated policy replaces the previous Accessibility Plan for Epic Investment Services' ("Epic"). This policy implements the requirements of the Accessible Customer Service Standard and the Integrated Accessibility Standards (Information and Communication, Employment, Transportation, Design of Public Spaces), Ontario Regulation 429/07, Ontario Regulation 191/11, and Ontario Regulation 413/12 under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Statement of Commitment

Epic is committed to providing excellent customer service to all its clients and/or customers. Epic is committed to be in compliance with AODA and its accessibility standards. Epic shall provide accessibility and accommodation for persons with disabilities through AODA's customer service standard, integrated accessibility standard and all other standards, and in accordance with the requirements of the Ontario Human Rights Code.

The Accessibility Policy sets out the responsibilities of all persons in the employ of Epic and those serving Epic in an appointed capacity.

Definitions

"Accessible Communication Supports" means:

Captioning, alternative, and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"Accessible Formats" means:

Large print, clear text, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.

"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 coordination, blindness, or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other service 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) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

The definition includes disabilities that are non-visible, are temporary, may be intermittent or have varying degrees of severity. Information about any person's disability is personal and private and must be treated confidentially.

“Extranet website” means a controlled extension of the intranet, or internal network of an organization to outside users over the Internet;

“Internet website” means a collection of related web pages, images, videos, or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public;

“Intranet website” means an organization's internal website that is used to privately and securely share any part of the organization's information or operational systems within the organization and includes extranet websites;

“New internet website” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh;

“New intranet website” means either an intranet website with a new domain name or an intranet website with an existing domain name undergoing a significant refresh.

“Guide Dog” means:

A guide dog as defined in section 1 of the Blind Persons Rights' Act.

“Medical aid” means an assistive device including respirators and portable oxygen supplies.

“Mobility assistive device” means a cane, walker, or similar aid.

“Personal Assistive Devices” means: Any aids including communication, cognition, and personal mobility, medical or technical aids that are used to increase, maintain, or improve the functional abilities of persons with disabilities. Assistive devices include, but are not limited to - wheelchairs, walkers, speech synthesizers, TTYs (Telephone Typewriters or Telephone Teletypes), computer technologies, canes, and hearing devices.

“Performance management” means activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success.

“Redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff when a particular job or department has been eliminated by the organization.

“Service Animal” means:

An animal that is of service to a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability. Verification of a service animal’s status can be provided by way of government certification or by a letter from a registered health professional confirming the animal is required for reasons relating to the person’s disability. Regulated health professionals who are eligible to provide this documentation include: an audiologist, speech-language pathologist, chiropractor, nurse, occupational therapist, physiotherapist, psychologist, registered psychotherapist, registered mental health therapist, physician, or surgeon.

“Support Person” means:

Any one person who accompanies a person with a disability in order to help with communication, mobility, personal care, or medical needs or with access to goods or services.

“Volunteer” means:

A person who freely chooses to provide services to Corporate without being remunerated or paid for such service in any way. A volunteer is not required to give or entitled to receive any notice to terminate the volunteer relationship.

Multi-Year Accessibility Plan and Annual Progress Reports

Epic will draft and make public a Multi-Year Accessibility Plan to address compliance requirements of O. Reg. 191/11. Together, the Multi-Year Plan and the Accessibility Policy will replace Epic’s Accessibility Plan and will be made public by January 31, 2024. Epic will also draft and make public annual progress reports outlining steps taken to meet the goals and objectives of the Multi-Year Plan. The Multi-Year Plan Progress Report will be made public by January 1 of each year beginning January 2025.

Accessible Customer Service Policy

How Epic Provides Services

- Our goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities.
- Epic will listen to, be courteous, and treat all citizens with dignity and respect at all times.
- Epic will take the initiative to understand the needs of each individual in order to provide effective and efficient service every time.
- The provision of goods and services to persons with disabilities will be integrated within existing methods wherever possible unless an alternate measure is necessary, whether temporarily or permanently, to aid a person with disability to obtain, use or benefit from the goods and services.
- Epic will provide people with disabilities with equal service. If this is not possible or is cost prohibitive, Epic will provide choices and options regarding how Epic provides services and will work with clients and/or customers to find acceptable and workable alternatives.

- Epic will take the initiative to identify and prevent problem situations up front and propose workable alternatives.
- Epic shall take reasonable steps to communicate with persons with disabilities in ways that take into account their disability. Epic shall also ensure that all staff, volunteers, and others dealing with the public on behalf of Epic are properly trained in how to communicate with guests with various types of disabilities.

Assistive Devices

People with disabilities will be permitted to access, use and/or benefit from goods or services through the use of their own assistive devices.

In the event a person utilizing an assistive device cannot access our goods or services, Epic will accommodate the client and/or customer by using any other temporary measures available and deemed appropriate, such as but not limited to providing access to other facilities, devices, or a Support Person.

Service Animals

Certified service animals shall be permitted entry to all corporate facilities and meeting rooms which are open to the public, except where prohibited by law (such as where food preparation is being undertaken).

If it cannot be easily identified that the animal is a service animal, we will ask the person to provide documentation from a regulated health professional. The documentation must confirm that the person needs the service animal for reasons relating to their disability. Regulated health professionals who are eligible to provide this documentation include:

- A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
- A member of the College of Chiropractors of Ontario.
- A member of the College of Nurses of Ontario.
- A member of the College of Occupational Therapists of Ontario.
- A member of the College of Optometrists of Ontario.
- A member of the College of Physicians and Surgeons of Ontario.
- A member of the College of Physiotherapists of Ontario.
- A member of the College of Psychologists of Ontario.
- A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. O. Reg. 165/16, s. 16.

Support Persons

Epic may require that a person with a disability is accompanied by their support person at a specific location if a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others. Before requiring a support

person accompany a person with disability at any location, Epic will consult with the person with a disability to understand their needs, consider health or safety reasons based on available evidence and determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

Notice of Temporary Disruptions

If a temporary service disruption occurs which would limit a person with a disability from gaining access to the goods and service, Epic will post notice or otherwise make the disruption known to clients and/or customers in the following methods/places:

- Website; **and**
- Notice on all facility entrances where the disruption has occurred; **and**
- Reception and Information Counters; **and**
- Notification by Staff (where applicable); **and**
- Automated Answering Service – voice and TTY (where appropriate)

If an unexpected disruption occurs, persons with disabilities will be accommodated by the use of other means possible to deliver the goods and service, if available such as:

- The goods and service delivery agent may provide the goods or service directly to the person with a disability at an alternate place and time, as deemed appropriate; or
- If appropriate or required, deliver the goods and service to the person's place of residence; or
- Any other assistive measures available and deemed appropriate to deliver goods and services.

All notices of disruption shall include:

- The name of the event/service; and
- The normal service location being impacted; and
- Alternate service locations; and
- Alternate service methods; and
- Hours of service availability; and
- Contact information; and
- Any other information which impacts the delivery of goods and services.

Information And Communication Policy

Emergency Procedures, Plans and Public Safety Information

Emergency procedures, plans and public safety information that are available to the public as well as any relevant updates to these procedures, plans and information, will be made available to the public and in an accessible format or via accessible communication support upon request. Timeframes for provision of this information will be dependent upon the format requested but will be provided as soon as is practicable.

Epic staff are trained in emergency response policies and procedures as they relate to people with disabilities, including how to communicate emergency information, and how to offer evacuation assistance to people with disabilities, identifying accessible and safe evacuation routes.

Availability of Information in Alternate Format

Corporate information will be made available to the public and in an accessible format or via accessible communication support upon request. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable.

Website Accessibility

Beginning January 1, 2014, any new website design, new internet website or intranet website, or web-based applications that Epic controls directly or through a contractual relationship that allows for modification of a product will also conform to W3C WCAG 2.0 Level AA.

Employment Policy

Workplace Emergency Response Information

Workplace Emergency procedures, plans and safety information will be made available to staff in an accessible format or via accessible communication support upon request. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable. This information will be provided to the designated person who will assist the person with the disability as soon as is practicable upon consent from the originating employee requesting the accommodation. These procedures will be reviewed with the staff on an annual basis and when there are changes to their circumstances. These procedures will also be reviewed when an employee moves to a different location within the organization and when the organization reviews all its emergency response policies.

Individualized Emergency Response Plans for Corporate Staff

Corporate staff with disabilities who may require assistance in an emergency are encouraged to identify their accessibility needs to their immediate supervisor so that

individualized emergency accommodation plans can be created. Individualized plans will be created using Epic's template. This information will be maintained confidentially.

Applicant Accommodation in Recruitment and Selection

Epic will make accommodation available in its recruitment process to applicants with disabilities upon request. Applicants will also be accommodated when they are individually selected to participate in an assessment or selection process.

Epic will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment and selection processes. If a selected applicant requests an accommodation, Epic will consult with the applicant and provide or arrange for the provision of a suitable accommodation.

Notice of Accommodation Availability to Employees

Epic will notify successful applicants of its policies for accommodating employees with disabilities when making offers of employment.

Epic will also notify its employees of its policies for providing job accommodations. Employees will be provided updated information whenever there is a change to existing policies.

Accessible Formats and Communication Supports for Employees

Epic will ensure all employees have information that is needed in order to perform the employee's job; and information that is generally available to employees in the workplace. When an employee with a disability requests accessible formats or communication supports, Epic will consult with the employee and provide or arrange for the provision of a suitable accommodation.

Individualized Accommodation Plans

Epic shall create and use a written process for the development of documented individual accommodation plans for employees with disabilities.

Return-to-Work Accommodation Plans

Epic shall create and use a written process for the development of return-to-work individual accommodation plans for employees returning to work who have been absent due to a disability and who now require accommodation in order to resume work.

Accommodation in Performance Management, Career Development and Advancement and Re-deployment

Epic will ensure its performance management, career development and advancement opportunities and redeployment processes are accessible to employees with disabilities. When an employee with a disability requests accessible formats or communication supports, Epic will consult with the employee and provide or arrange for the provision of a suitable accommodation.

Training

All employees, agents and volunteers of Epic who are in direct contact with the public (e.g., face-to-face or telephone communication) shall be trained in the various aspects of accessible customer service delivery and integrated accessibility standards as appropriate to their roles and responsibilities.

All training, regardless of format, shall have regard for:

- An overview of the purposes of the AODA;
- Overview of Accessible Customer Service and Integrated Accessibility Standard requirements;
- Instruction on how to interact and communicate with people with various types of disabilities, including provision of alternate formats;
- Instruction on interacting with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal or a support person;
- Overview of Epic's obligation to provide information in alternate formats and alternate communication supports upon request including:
 - a) Review of different types of alternate formats
 - b) Review of alternate communication supports (sign language, gestures, boards with symbols, voice-synthesizers, etc.)
 - c) Review of Epic's alternate format service provider and process relating to securing information in alternate formats
- Instruction on the use of equipment or devices available, such as wheelchairs and TTY
- Overview of Ontario Building Code accessibility updates
- Overview of Design of Public Spaces Standard requirements
- Instruction on what to do if a person with a disability is having difficulty accessing corporate services.

In addition to the above customer service training, management and supervisory staff will be trained in the Employment Policy requirements and procedures (accessible recruitment and screening, employment policy and accommodation planning training) as well as our obligations under the Ontario Human Rights Code.

Training shall be mandatory for all employees upon their initial indoctrination and every year thereafter. Ongoing training will also occur when whenever there are changes to the policies. Epic will create and update training records to track accessibility training. A copy of our training policy is available upon request and will be provided in an accessible format as applicable.

Design Of Public Spaces Policy

Epic does not own or operate on-street or off-street parking facilities. Reception and/or Information counters will be made accessible when renovations are completed in our offices, as applicable.

Feedback Process

Feedback may be provided by a person with a disability in the manner deemed most convenient to them, such as in person, by telephone, in writing, or by delivering an electronic text by email or otherwise. Epic will provide or arrange for accessible formats and communication supports, on request when requesting or receiving feedback from people with disabilities.

Feedback may be provided directly to the service provider or:

- In person;
- By telephone (416-497-9332);
- In writing (Epic Investment Services, Attn: Vice President, Human Resources, 141 Adelaide St. W., Suite 1201, Toronto, ON, M5H 3L5)
- XPERA confidential reporting service; ConfidenceLine at 1-800-661-9675; or
- XPERA confidential reporting service; www.epic.confidenceline.net.

All feedback will be kept in strict confidence and used to improve customer service.

The Responsible Officer (the Human Resources department) for the Accessibility Policy will acknowledge concerns within ten (10) business days and will respond in a timely manner with information regarding how the issue will be addressed.

Epic will make every effort to understand the problem, identify the appropriate contact and work towards a resolution.

In addition, the author of the feedback will be provided a response in a format identified as accessible to them.

Availability Of Documents

This policy and any other document deemed to be key in the delivery of goods and services will be made available upon request in a format that takes into account the person's disability.

Notwithstanding the above, this policy will be made available on Epic's website and made available to any person to whom it provides goods or services using any other method or format as are reasonable in the circumstances.

Policy Review Process

At minimum, this policy will be reviewed annually by appropriate corporate staff. However, the review process may be affected by AODA Regulations as they are announced. Therefore, this policy will also be reviewed upon announcement of any new Accessibility Standards of the AODA, 2005 to ensure integration and consistency with this policy. The policy may be modified to ensure full compliance with the AODA, 2005.