

Crowe Soberman LLP Member Crowe Global

2 St. Clair Avenue East, Suite 1100 Toronto, ON M4T 2T5 416 964 7633 416 964 6454 Fax www.crowesoberman.com

(INTEGRATED ACCESSIBILITY STANDARDS POLICY (AODA Policy)

Commitment of Crowe Soberman LLP

Crowe Soberman LLP is fully committed to breaking down barriers that might inhibit inclusion and to increase accessibility in all aspects of our services. This commitment will better serve all communities in which we operate. It is important to us that everyone receive the same quality of services, and access to those services, is in no way restricted by disability. The objective of this policy is to govern this Firm in accordance with both the requirements and the spirit of Regulation 191/11, *Integrated Accessibility Standards*, under the *Accessibility for Ontarians with Disability Act*, 2005.

Accessibility for Ontarians with Disabilities Act

The AODA was created to acknowledge the discrimination, and difficulties experienced by individuals with disabilities. This law seeks to ensure that Ontario is completely accessible for all individuals by 2025. We have created a multiyear plan to ensure that we comply with all current and future regulations. The Firm is committed to ensuring that all clients and employees are treated with dignity and respect, and we are committed to doing our part to ensure Ontario is completely accessible by 2025.

Our firm demonstrates that commitment in the following ways:

Communication – We will endeavour to communicate in ways that take into account the individual needs of our clients and employees.

Assistive devices – Our premises accommodate such devices and the staff members who require them.

Use of registered service animals and support persons – Clients or visitors are welcome to be assisted by service animals or support people at any time.

Notice of temporary disruption – In the unlikely event that access to our premises is restricted in some way, we will endeavour to provide as much notice in that regard as possible. This notice will set out alternative facilities or services available, as appropriate.

Training and Internal Communication – All firm members have been provided a summary of the requirements under AODA and the spirit behind the legislation. Training is provided to all current and new employees. We maintain records of all such training. Most importantly, the partners and senior management of Crowe Soberman LLP are fully supportive of the rights of people with disabilities and are committed to conducting their day to day business in such a way that dignity and independence for all are maintained at all times.

Crowe Soberman LLP is a member of Crowe Global, a Swiss verein. Each member firm of Crowe Global is a separate and independent legal entity. Crowe Soberman LLP and its affiliates are not responsible or liable for any acts or omissions of Crowe Global or any other member of Crowe Global. Crowe Global does not render any professional services and does not have an ownership or partnership interest in Crowe Soberman LLP.



Accessibility Plan

The Firm will set out the necessary steps to comply with Ontario's accessibility laws, and will prevent and remove accessibility barriers where practical. The Accessibility Plan will be reviewed and updated once every five years at a minimum. A copy of the Accessibility Plan is available on our website, and will be made available in an accessible format, upon request.

General Training Requirement

Training on accessibility standards referred to in the Regulation, and in the Ontario Human Rights Code will be provided by the Firm. Training will be provided to:

- All existing and new employees as well as volunteers;
- All persons in the Firm who participate in developing policies and;
- All third party service providers who act on behalf of the Firm.

Accessibility standards training will be provided as soon as required and will be appropriate to the duties of the aforementioned groups. Training will also be provided when changes are made to this Policy. A record of such training will be kept by the Human Resources Department. The Firm will ensure that all third party service providers are required to maintain training records that include training dates, names of attendees and such records be available upon the Firm's request.

INFORMATION AND COMMUNICATIONS STANDARDS

Accessible Formats and Communication Supports for Employees

Upon request, the Firm will provide accessible formats and communication supports for information that pertains to an employee's job and any other general information that is available to other employees. When receiving a request, the Firm will consult with the employee to ensure that his or her information and communication needs are accurately outlined, and achieved.

Feedback Processes

The Firm's goal is to provide exceptional service to all our clients. We encourage and greatly appreciate comments on our services. This feedback can be made by email, fax, online, in writing or verbally. In conjunction with the Accessibility Standard for Customer Service, the Firm will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities as well as arranging for various accessible formats and communication supports, upon request.



Accessible Formats and Communication Supports

Arrangements for accessible formats and communication supports for persons with disabilities will be provided a timely manner. The Firm will consult with the individual making the request to determine which accessible format is suitable for their specific requirements.

The general public will be informed, via the Firm's website, that accessible formats and communication supports are available upon request.

Accessible Websites and Web Content

The Firm will continue to ensure that our internet presence and content will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and Level AA.

Emergency Procedure, Plans and Public Safety Information

When changes are made to emergency procedures, plans or public safety information will be available to the public in an accessible format, upon request. The Firm's landlord, CBRE will post signs of service disruption when access to our Firm is affected.

Workplace Emergency Response Information

Individualized workplace emergency information will be provided by the Firm to Persons Requiring Assistance (PRA), if the disability is such that an individualized plan is necessary and the Firm is aware of the need for accommodation. With the consent of the employee with a disability, the Firm will share this information with the Joint Health and Safety Committee and the Firm's designated person to assist the employee with a disability. Should there be a change to the employee's work location or accommodation needs, the Firm will review and revise their individualized workplace emergency response plan and overall accommodation requirements.

EMPLOYMENT STANDARDS

Recruitment, Assessment or Selection Process

The Firm is committed to diversity and inclusion and encourages everyone to apply for job opportunities at Crowe Soberman LLP. The Firm will accommodate applicants with disabilities in all stages of our



recruitment process. Accessible formats and communication supports are available upon request. All posted job descriptions will inform potential applicants of the Firm's accommodation policy. Applicants are reminded of the availability of accommodation in any invitation for an assessment or interview. Should an accommodation request be made, the Firm will provide or arrange for suitable accommodation in a way that respects the person's individual disability. All new hires will be made aware of the Firm's accommodation policies as soon as practical after their employment start date. The Firm may request medical documentation to provide evidence to support accommodation needs as well as to support the assessment of accommodation options and solutions during the recruitment process.

Documented Individual Accommodation Plans

An individual accommodation plan is a formal way of recording and reviewing the workplace-related accommodations that will be provided to an employee with a disability. The Firm will work with any employee who requests accommodation to create a plan that includes all elements outlined by the Regulation. The Firm may request medical documentation from an employee to provide evidence to support accommodation needs and to support the assessment of the accommodation options, as well as the solutions. The Firm may, when needed, consult with additional outside resources to ensure we have the tools to meet the accommodation needs. The Firm is committed to ensuring the privacy of all our employees, and will govern ourselves to ensure the privacy of the employee and their disability is protected at all times. If we do need to share information with an additional resource the Firm will obtain the permission of the employee in writing, prior to sharing any personal information. Accommodation plans will include individualized workplace emergency response information as well as identification of any other accommodations that need to be provided. The plans will include a reasonable review date.

Return to Work Process

An employee absent from work due to a disability will have a documented return to work (RTW) process. The RTW process will take into account his or her individual disability, such that accommodations can be made to assist the employee's successful reintegration back into the workplace; will outline the steps the Firm will take to facilitate the employee's RTW. The Firm will document this process in the employee's individual accommodation plan.

Performance Management, Career Development and Advancement and Re-deployment

The Firm will consider the individual accessibility needs of our employees with disabilities when providing performance management, career development and advancement.



Questions about this policy

The Firm's goal is to break down barriers that inhibit inclusion and increase accessibility in all aspects of our services to better serve all communities in which we operate. Any questions or feedback relating to this Policy can be directed to:

Susan Hodkinson Chief Operating Officer <u>susan.hodkinson@crowesoberman.com</u> 416 963 7172