



Canada Lands Company AODA Accessibility Policy

1. Application

This policy applies to all Ontario operations and offices of Canada Lands Company Limited and its subsidiaries (collectively, the “Company”).

2. Objectives

This policy is intended to comply with the principles and guidelines set out in the *Accessibility for Ontarians with Disabilities Act 2005 (“AODA”)* and to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11 (“IASR”)*. This policy and the Responsibilities described in Section 5 apply to the Company’s operations and offices in Ontario.

3. Definitions

The following terms are used in this policy and have the following meanings:

Accessible, Accessibility: products, services, facilities or environments that can be accessed, used by, or understood by all persons, including those with disabilities

Accessible or Alternate Formats: include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities

Assistive Devices: any device used to assist persons with disabilities, including:

- Mobility assistive devices, such as a cane, walker, wheelchair, electronic scooter, or similar device used to assist with mobility
- Communication devices, such as a hearing device, laptop computer, communication board, or similar device used to assist with communication
- Medical devices, such as a personal oxygen tank or similar device used to assist with medical requirements of a disability

Barrier: anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including physical, architectural, information or communications, attitudinal, technological, or systemic policies or practices



Communication Supports: include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications

Disability: This policy uses the *AODA* and *Ontario Human Rights Code* definition of Disability, which defines a disability as:

- 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) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*; (“handicap”).

Information: includes data, facts and knowledge that exists in any format, including text, audio, images, digital or print, and that conveys meaning

Kiosk: an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products

Public spaces: As defined by the *AODA*, 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
- Accessible on-street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

Service Animal: An animal is a service animal for a person with a disability if:

- a) the animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as an identifying vest or harness worn by the animal; or
- b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to a disability:



- i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
- ii. A member of the College of Chiropractors of Ontario.
- iii. A member of the College of Nurses of Ontario.
- iv. A member of the College of Occupational Therapists of Ontario.
- v. A member of the College of Optometrists of Ontario.
- vi. A member of the College of Physicians and Surgeons of Ontario.
- vii. A member of the College of Physiotherapists of Ontario.
- viii. A member of the College of Psychologists of Ontario.
- ix. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. O. Reg. 165/16, s. 16.

Support Person: In relation to a person with a disability, a support person is any 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, services or facilities.

Web Content Accessibility Guidelines: refers to the World Wide Web Consortium (W3C) recommendations entitled Web Content Accessibility Guidelines (WCAG).

4. Principles

The Company is committed to applying the principles and guidelines set out in the AODA with respect to its operations and offices in Ontario, and to meeting the accessibility needs of persons with disabilities in a timely manner. All information and communications materials and services provided by the Company in Ontario shall follow the principles of dignity, independence, integration and equal opportunity.

5. Responsibilities

Statement of Commitment to Accessibility

Canada Lands Company CLC Limited and all of its subsidiaries (collectively, the “Company”) are committed to treating all individuals in a way that allows them to maintain their dignity and independence. The Company believes in integration, equal opportunity, access and participation for people with disabilities and is committed to ensuring a safe, dignified, and welcoming environment for everyone. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by ensuring compliance with all applicable federal and provincial accessibility laws and by identifying, preventing and removing barriers to accessibility.



Training

The Company will provide AODA and accessibility training to all employees and volunteers. This training will be provided during the initial orientation prior to commencing duties and when changes are made to accessibility policies or procedures. The Company will also ensure that those who are involved in the development and approval of accessibility-related policies, practices and procedures are trained on the AODA and the Ontario Human Rights Code.

Information and Communication

The Company will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports. The Company will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements.

Accessible or Alternate Formats and Communication Supports

The Company will provide or arrange for the provision of accessible or alternate formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual. The Company will take into account the person's accessibility needs when responding to individual requests.

Assistive Devices

The Company is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from the Company's goods and services. Staff and volunteers will be trained how to interact with persons with disabilities who use an assistive device. Refer to Definition of Assistive Device in Section 3.

Service Animals

The Company is committed to welcoming people with disabilities who are accompanied by a service animal on Canada Lands premises that are open to the public and other third parties. Staff and volunteers will be trained how to interact with persons with disabilities who require the assistance of a guide dog or other service animal. Refer to Definition of Service Animal in Section 3.

Support Persons

The Company is committed to welcoming people with disabilities who are accompanied by a support person. Staff and volunteers will be trained how to interact with persons with disabilities who require the assistance of a support person. Refer to Definition of Support Person in Section 3.

Any person with a disability who is accompanied by a support person will be allowed to access Canada Lands premises that are open to the public and other third parties. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on the premises. Fees will not be charged for support persons for admission to the premises.



Notice of Temporary Disruption

The Company will provide notice in the event of a planned or unexpected disruption in the accessible facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. This notice will be posted at the location of the disruption of facilities or services and at the front entrance of the facility. For lengthy and planned delays, notice will also be posted on the Canada Lands Company website.

Accessibility Feedback

Feedback regarding accessibility to goods and services and the manner in which Canada Lands Company employees interact with others is welcome and appreciated. An accessibility feedback form is available upon request and on the Accessibility page of the Canada Lands Company website at <https://en.clc.ca/accessibility-options>. The Human Resources Manager will provide a response to accessibility feedback within five business days. Concerns will be addressed according to the Company's complaint management procedures.

Establishment of Accessibility Policies and Plans

With respect to its operations and offices in Ontario, the Company will create and maintain a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the AODA. The Company will post its accessibility plans on its website, and provide the plan in an alternate format upon request. The Company will review and update its accessibility plan once every five years, in consultation with Company accessibility advisory committee members, including persons with disabilities.

The Company will also prepare and post public annual status reports to report on the progress of steps taken to implement the Company's accessibility plan. As with other AODA and accessibility documents, the annual status report will be provided in an accessible format upon request.

Procuring or Acquiring Goods, Services, or Facilities, including Self-Serve Kiosks

The Company will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks, except where it is not possible or practical to do so. If it is not possible and practical to incorporate accessibility criteria when procuring or acquiring goods, the Company will provide an explanation upon request.

Hiring (for applicants)

The Company is committed to being inclusive in our hiring policies. We will notify the public that we will accommodate the needs of people with Disabilities throughout our selection and hiring process. During the selection process, we will include the following paragraph in print and online job postings:

Canada Lands Company CLC Limited is an equal opportunity employer that is committed to inclusive recruitment and selection. Canada Lands welcomes and encourages applications from people with disabilities. If you require an accommodation during the selection process, please



inform us as soon as possible and we will make every effort to fulfill your accommodation request.

When scheduling an interview, we will ask applicants if they have any accommodation requests. If an interview candidate requests an accommodation, we will discuss their request with them and make every effort to fulfill their accommodation requests.

Workplace information (for employees)

The Company will provide workplace information in an accessible format if an employee requests it. This includes:

- any information employees need to perform their jobs (for example, job descriptions and manuals)
- general information that is available to all employees at work (for example, company newsletters, bulletins about company policies, and health and safety information)

If an employee with a disability requests information in an accessible or alternate format or requires communication supports, the Company will work with them to determine how best to meet their needs and to provide accessible workplace information in a timely manner.

The Company will work with employees with disabilities to develop individual accommodation plans. Where necessary, these plans will also include individual emergency response plans and information to assist during an emergency or evacuation.

Company performance management, career development and redeployment processes will consider the Accessibility needs of employees.

Design of Public Spaces

When building or making major changes to public spaces of its Ontario-based facilities, the Company will ensure that accessible designs are incorporated wherever possible.

Communicate accessibility policies

The Company will inform all employees about policies to support people with disabilities. Our Accessibility Policy will be reviewed with new employees when they are hired, and all current employees will be informed if we modify our Accessibility Policy.

The current Canada Lands Company Corporate Accessibility Policy, AODA Accessibility Policy, Multi-year Accessibility Plan, and other public accessibility policies and procedures are posted at <https://en.clc.ca/accessibility-options>.

Changes to existing policies

The Company will modify or remove an existing policy that does not respect and promote the dignity and independence of people with Disabilities.



Learn more about accessibility at Canada Lands Company

<https://en.clc.ca/accessibility-options>

Rose Crisostomo, CHRL
Human Resources Manager
Canada Lands Company Limited
Phone 416-214-1255
Email: RCrisostomo@clc.ca