

**Woodbine Entertainment Group Corporate Policy**  
**Accessibility for Ontarians with Disabilities Act**  
Integrated Accessibility Standards Regulation Policy

**APPLIES TO: All Employees**

**Purpose:**

This policy establishes Woodbine Entertainment Group’s (WEG’s) commitment to meet the accessibility needs of persons with disabilities in compliance with the Integrated Accessibility Standards Regulation in the areas of Employment, Information and Communications, Transportation and Public Spaces in accordance with Ontario Regulation 191/11 (the “Regulation”).

**Scope and Responsibilities:**

This policy has been written in accordance with the Regulation and addresses how Woodbine Entertainment Group (WEG) achieves accessibility through meeting the Regulation’s requirements. It provides the overall strategic direction that we will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include the following four (4) items:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- Training; and
- Other specific requirements under the Information and Communications, Employment, and Public Spaces Standards.

## **Policy Statement and Organizational Commitment:**

WEG is committed to and guided by the following four (4) core principles:

- 1) Dignity
- 2) Independence
- 3) Integration
- 4) Equal Opportunity

We support the full inclusion of persons as set out in the Ontario *Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act, 2005*.

WEG shall endeavor to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

## **Definitions:**

Below is a list of fifteen (15) definitions used in this policy, listed in alphabetical order:

**Accessible Formats** may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**Accommodation** means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

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

**Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

**Conversion Ready** means an electronic or digital format that facilitates conversion into an accessible format.

**IAP** means Individualized Accommodation Plan.

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

**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.

**Maintenance of Public Spaces** means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.

**Mobility Aid** means a device used to facilitate the transport, in a seated posture, of a person with a disability.

**Mobility Assistive Device** means a cane, walker, wheelchair, scooter or similar aid.

**New Internet Website** means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

**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.

**Unconvertible** means that it is not technically feasible to convert the information or communications. It also means that the technology to convert the information or communications is not readily available.

**Web Content Accessibility Guidelines** means the World Wide Web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines” (WCAG) 2.0.

### **General Provisions:**

This section covers the general requirements of the Integrated Accessibility Standards Regulation.

### **Multi-Year Accessibility Plan**

WEG’s Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the *Accessibility for Ontarians with Disabilities Act* (AODA). WEG will review the progress and implementation of the plan, post the plan on our website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years.

### **Procuring or Acquiring Goods, Services or Facilities**

WEG will use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so, in which case, if requested we will provide an explanation.

### **Training:**

WEG will ensure that training is provided to employees on the requirements of the accessibility standards referred to in the Regulation and in the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable following the hiring of new employees, and will be refreshed for existing employees from time to time. If any changes are made to this policy, further training will be provided. We shall maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

### **Information and Communications Standards:**

WEG will create and provide information and communications in ways that are accessible to people with disabilities.

If WEG determines that it is not technically feasible to convert the information or communications, or the technology to convert the information or communications is not readily available, we will provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

### **Emergency Information**

If WEG prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

### **Feedback**

WEG shall provide all feedback received with respect to its compliance with the Regulation and/or this Policy from customers to WEG's Customer Service Department. WEG's Customer Service Department

shall respond to customer feedback and will ensure that any responses are provided in accessible formats and with communication supports upon request. We will notify the public about the availability of accessible formats and communication supports. Where feedback is received from an employee with respect to WEG's compliance with the Regulation and/or this Policy, the employee's supervisor will provide such feedback to WEG's Human Resources Department, who will respond to the employee.

### **Accessible Formats and Communication Supports**

WEG shall provide or arrange for accessible formats and communication supports for persons with disabilities in the following manner:

- a) Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- b) At a cost that is no more than the regular cost charged to other persons;
- c) In consultation with the person making the request to determine the suitability of an accessible format or communication support;

### **Website Accessibility**

WEG shall make its internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA.

### **Employment Standards:**

The Employment Standards of the Regulation build upon the existing requirements under the *Ontario Human Rights Code* in relation to how we provide accessibility throughout the entire employment cycle. It applies with respect to employees but does not apply to volunteers and other non-paid individuals.

The requirements of the Employment Standard shall be met by WEG by January 1, 2016 unless otherwise specified.

### **Recruitment**

WEG shall notify employees and the public about the availability of accommodations for applicants with disabilities as listed below:

- 1) Specify that accommodation is available for applicants with disabilities on job postings;
- 2) If a selected applicant requests an accommodation, WEG shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;

3) Notify successful applicants of the policies for accommodating employees with disabilities.

### **Employee Notification**

WEG shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

WEG shall provide information required under this section to new employees as soon as practicable after they begin their employment and whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

### **Accessible Formats**

In addition and where an employee with a disability requests it, WEG will consult with the employee to provide or arrange for the provision of accessible formats and communication supports as listed below:

- information that is needed in order to perform the employee's job; and
- information that is generally available to employees in the workplace.

WEG shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **Individual Accommodation Plan (IAP)**

An IAP shall be provided to an employee with a disability upon request. WEG will develop and document such individual accommodation plans for employees with disabilities in accordance with the following:

- The employee's participation in the development of the IAP;
- Assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- WEG may request an evaluation by an outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- The employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace if not from a bargaining agent;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;

- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- Identification of any other accommodation that is to be provided.

### **Return to Work**

WEG will develop and document a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such process shall outline the steps that WEG will take to facilitate the return to work and include an individual accommodation plan.

### **Performance Management, Career Development and Advancement, and Redeployment**

WEG will take into account the accommodation needs and/or individual accommodation plans of employees when:

- Using performance management processes;
- Providing career development and advancement information;
- Using redeployment procedures.

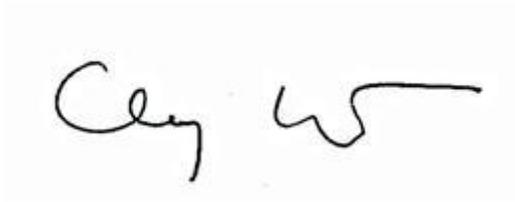
### **Workplace Emergency Response Information**

WEG shall provide individualized workplace emergency response information to employees who have a disability as per the four (4) points below:

- If the disability is such that individualized information is necessary and WEG is aware of the need for accommodation due to the employee's disability;
- If the employee who receives individual workplace emergency response information requires assistance and with the employee's consent, WEG shall provide the workplace emergency information to the person designated by WEG to provide assistance to the employee;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- Review the individualized workplace emergency response information when the employee moves to a different location in the company, when overall accommodations needs or plans are reviewed and when WEG reviews its general emergency response policies.

**Public Spaces Standards:**

WEG will incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2017. WEG will follow the existing requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment). WEG will provide maintenance and restoration of public spaces, where applicable, and notify the public of temporary disruptions and alternatives available.

A handwritten signature in black ink, appearing to read "Clay W.", is centered within a light gray rectangular box.

Approval: \_\_\_\_\_  
Chairman of the Board of Directors

Date: August 11, 2015