



Accessibility at Numeris

Accessibility Plan:

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations, including Numeris, to ensure their workplaces and services are fully accessible to the public and employees, which include persons with disabilities.

AODA requires that every employer with 50 or more employees, develop and posts a Multi-Year Accessibility Plan. This accessibility plan outlines the organizations strategy to prevent and remove accessibility barriers for persons with disabilities.

The objective of the Multi-Year Accessibility Plan is to ensure corporate compliance with the AODA and demonstrates Numeris' commitment to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

Barrier Assessment:

In accordance with the AODA and with the organizations commitment to treating all people in a way that allows them to maintain their dignity and independence we will create an inclusive work environment for our people to develop to their full potential, through our plan, which seeks to prevent and remove barriers to accessibility for persons with disabilities.

A "barrier" is anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. Typical barriers to accessibility encountered by persons with disabilities include Physical / Architectural, Attitudinal, Informational/Communication, Systemic, and Technological barriers.

Barrier Examples:

Physical/Architectural: design elements of a building or a space that cause problems for persons with disabilities.

Attitudinal: our perceptions of, and how we interact with persons with disabilities.

Informational/Communication: things/situations that make it difficult for a person with a disability to give, receive or understand information.

Systemic: organizational policies or practices that (often unwittingly) restrict the participation of persons with disabilities.

Technological: poor or inexistent technology system that can prevent people from accessing information. Common tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.

Numeris Multi-Year Accessibility Plan

Part I: General Requirements

Initiative	AODA Requirement	Action	Commencement	Compliance Date
1.1 Establishment of Accessibility Policies	Numeris shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<ul style="list-style-type: none"> Policy complete and posted on Numeris' s external website and internal P&C portal 	Completed	January 1, 2014
1.2 Accessibility Plans	Numeris shall, <p>(a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>(b) post the accessibility plan and provide the plan in an accessible format upon request; and</p> <p>(c) review and update the accessibility plan at least once every five years.</p>	<ul style="list-style-type: none"> P&C to ensure AODA requirements are on track and that plan is adhered to Barriers should be identified and addressed Feedback to be solicited by stakeholders and addressed and compliance deadlines are to be met 	Completed requirements to December 31, 2014 – Continue as noted and updated annually.	January 1, 2014
1.3 Training	Numeris shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,	<ul style="list-style-type: none"> Annual membership through training provider HR Downloads AODA training provided to new hires and tracked accordingly within P&C 	Completed Training is ongoing	January 1, 2015

1.3 Training (contd.)	<p>(a) Employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>			
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PART II – Information and Communications Standards

Initiative	IASR Requirement	Action	Status	Compliance Date
2.1 Feedback	<p>The Company will ensure processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p>	<ul style="list-style-type: none"> • P&C and Communications established contact details for people with disabilities to make such requests; Numeris provides goods and services to persons with disabilities, or wish to request documents in an accessible format, you may contact Numeris' Accessibility Officer at 416-445-9800 or accessibilityofficer@numeris.ca or 1500 Don Mills Road, 3rd Floor, Toronto, ON, M3B 3L7. 	<p>Completed</p>	<p>January 1, 2015</p>
2.2 Accessible Formats & Communication Supports	<p>2.2.1 Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p>	<ul style="list-style-type: none"> • IT and P&C to review accessible formats and communication, technology supports currently available at NUMERIS 	<p>Ongoing/As required</p>	<p>January 1, 2016</p>

Initiative	AODA Requirement	Action	Status	Compliance Date
2.2 Accessible Formats & Communication Supports (contd.)	2.2.2 Communications shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> Understand functionality of accessible formats and communication supports available to better consult on requests for accessible formats that take into account the individual's disability needs 	Complete	January 1, 2016
	2.2.3 Numeris shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> Develop a process for responding to, approving or declining a request Website note advising as to a contact mechanism for accessible format requests 	Complete	January 1, 2016
2.3 Accessible Websites & Web Content	Numeris shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0,	<ul style="list-style-type: none"> Conducted an assessment current web functionality to ensure compliance and adequate accessibility features Ensure Technology and Content Owners (IT and Member Services, P&C & Communications) are aware of web requirements. 	Complete	December 31, 2014 New internet websites and web content on those sites conform with WCAG 2.0 Level A
	Initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	<ul style="list-style-type: none"> Conducted an assessment current web functionality to ensure compliance and adequate accessibility features Ensure Technology and Content Owners (IT and Member Services, P&C & Communications) are aware of web requirements. 	Complete	January 1, 2021 Complete - All internet websites and web content conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> success criteria 1.2.4 Captions (Live) success criteria 1.2.5 Audio Descriptions (Pre-recorded).

PART III – Employment Standard

Initiative	AODA Requirement	Action	Status	Compliance Date
<p>3.1 Recruitment, General</p>	<p>Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</p>	<ul style="list-style-type: none"> Review of all mechanisms for posting NUMERIS positions (website, campus posting) Incorporate language on postings and NUMERIS career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available 	<p>Complete</p>	<p>January 1, 2016</p>
<p>3.2 Recruitment, Assessment or Selection Process</p>	<p>3.2.1 During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>3.2.2 If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>	<ul style="list-style-type: none"> Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request Encourage and provide more diversity-related training to Talent Attraction on how to engage in conversations to solicit and handle accommodation requests, in accordance with AODA (how to ask for accommodation – develop scripts) Educate Talent Attraction on inclusive selection strategies developed by Ontario Human Rights Commission and on how to implement and request support for accommodation related requests Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA 	<p>Complete</p>	<p>January 1, 2016</p>

Initiative	AODA Requirement	Action	Status	Compliance Date
3.3 Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<ul style="list-style-type: none"> Incorporate in offer letter a section regarding NUMERIS's accessibility policies and where to access additional information on NUMERIS internal and external internet 	Complete	January 1, 2016
3.4 Informing Employees of Supports	3.4.1 Every employer 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 disability.	<ul style="list-style-type: none"> Develop change and communication strategy to educate and advise NUMERIS people on NUMERIS's accessibility policies, plan and processes 	Complete: Posted Policy and Plan/Memo	January 1, 2016
	3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> Accessibility policies and processes to be Incorporated in onboarding process 	Complete	January 1, 2016
	3.4.3 Employers shall provide updated information to its employees 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 disability.	<ul style="list-style-type: none"> Develop process and strategy to communicate any policy changes by email and posting on P&C portal 	Ongoing	January 1, 2016

Initiative	AODA Requirement	Action	Status	Compliance Date
3.5 Accessible Formats and Communication Supports for Employees	<p>3.5.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<ul style="list-style-type: none"> • Inform employees and Managers on the availability of accessible format and communication supports; in accordance with AODA • Inform employees and managers on process for requesting accessible formats and communication supports 	Complete – Ongoing as required	January 1, 2016
	<p>3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> • Develop a process for consulting with employees to determine accommodation needs, managers to deal with front line requests/escalate to P&C as required • Develop a process for advising employee of solution 	Complete – As required	January 1, 2016
3.6 Workplace Emergency Response Information	<p>3.6.1 Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p>	<ul style="list-style-type: none"> • Established process to provide people in Ontario who request, or for whom Numeris is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information 	Complete	January 1, 2012

Initiative	AODA Requirement	Action	Status	Compliance Date
	<p>3.6.2 If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>3.6.3 Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>3.6.4 Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<ul style="list-style-type: none"> Workplace Emergency Response Information includes a mechanism to obtain consent from the person to share the information with those designated to provide assistance in the event of an emergency Upon request, the Local office manager / health and safety representative will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs. 	<p>Complete</p> <p>Complete</p> <p>Complete & Ongoing</p>	<p>January 1, 2012</p> <p>January 1, 2012</p> <p>January 1, 2012</p>
<p>3.7 Documented Individual Accommodation Plans</p>	<p>3.7.1 Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<ul style="list-style-type: none"> Review of current accommodation processes and practices Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA 	<p>Complete</p>	<p>January 1, 2016</p>

Initiative	AODA Requirement	Action	Status	Compliance Date
	<p>3.7.2 The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The steps taken to protect the privacy of the employee's personal information. 5. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 6. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 	<ul style="list-style-type: none"> • Create a SOP for the development of documented plans that will incorporate the following elements: <ul style="list-style-type: none"> - Manner in which employee can request - Under which circumstances medical is required - Who will be assessing the medical provided - Work with 3rd party ability management consultant (disability partner) to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests - Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (3rd part ability management consultant) and what information may be shared • Educate employees and Managers on the Accessibility policies and processes and procedures for requesting individual plans • Develop change and communicate plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA 	Complete	January 1, 2016

Initiative	AODA Requirement	Action	Status	Compliance Date
3.9 Performance Management	<p>An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process giving consideration for employees with disabilities.</p>	<ul style="list-style-type: none"> • Assess current performance review processes to ensure accessibility features are incorporated • Ensure updated/new performance management processes to be rolled out incorporate accessibility features • Ensure training or communications to performance managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation 	Complete - Ongoing	January 1, 2016
3.10 Career Development & Advancement	<p>An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<ul style="list-style-type: none"> • Review of current training and professional development materials to determine accessibility features • Ensure all future developed training and materials are developed with accessibility features in mind • Track career progression of individuals with disabilities 	Complete - Ongoing	January 1, 2016

Final Remarks

In accordance with the AODA and with NUMERIS's objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for NUMERIS's people to develop to their full potential, the Multi-Year Accessibility plan is posted internally and publicly (numeris.ca) and will be reviewed and updated at least every 5 years.

If you have any comments on the manner in which Numeris provides goods and services to persons with disabilities, or wish to request documents in an accessible format, you may contact Numeris' Accessibility Officer at 416-445-9800 or accessibilityofficer@numeris.ca or 1500 Don Mills Road, 3rd Floor, Toronto, ON, M3B 3L7. To download a copy of Numeris' Accessible Customer Service Policy, please visit our website (numeris.ca).