M&R Property Management

Accessibility for Ontarians with Disabilities Act Policy

Section 1

Purpose

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") is to create a more accessible Ontario by identifying and, to the extent possible, preventing and eliminating barriers experienced by persons with disabilities. There are five standards set out under the AODA, all of which are to be implemented by the year 2025. These standards include: customer service, information and communications, employment, built environment and transportation, (collectively the "Integrated Accessibility Standards Regulation" or "IASR").

Statement of Commitment

M&R Property Management is committed to providing an accessible environment where all individuals have equal access to the Company's goods, services and employment that meets the individual needs of persons with disabilities in a way that maintains their dignity and independence. M&R Property Management believes in integration, and will take action to the extent possible, by preventing and removing barriers to accessibility in a timely manner.

M&R Property Management shall develop, implement, and maintain policies and procedures governing the provisions of goods, services, and facilities to people with disabilities in a manner that:

- maintains their dignity, independence and privacy;
- upon request provides accessible formats or communication supports;
- seeks to provide integrated services;
- provides an opportunity equitable to others to obtain, use and benefit from our products, services and employment;
- takes into account a person's disability; and,
- where an accessible solution(s) in not generally available, where possible, an alternative reasonable accommodation will be offered

SCOPE

This policy applies to all of M&R Property Management's employees, independent contractors, agents, volunteers or otherwise; and all other persons who provide goods or services to members of the public and third parties (collectively "Customers") in Ontario.

Section 2

Definitions

Accessible format(s): means formats that are an alternative to standard print and are accessible to persons with disabilities. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, and other formats usable by persons with disabilities.

<u>Accommodation</u> – Adapting or adjusting employment, services or facilities for persons with disabilities when a more inclusive design is not feasible or available.

<u>Assistive device(s)</u>: means any device used to assist a person in performing a particular task(s) or to aid that person in activities of daily living. This can include a wheelchair, screen reader, listening device or cane.

<u>Communication support(s)</u>: means supports that persons with disabilities may need to access information. Communication supports may include, but are not limited to, captioning, alternative and augmentative supports, plain language, sign language and other supports that facilitate effective communications.

<u>Disability</u> 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 coordination, 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 developmental disability;
- c. A learning disability, or 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*.

<u>Employee(s)</u>: means any employee or volunteer of the M&R Property Management.

<u>Guide dog(s)</u>: means a highly-trained working dog that has been trained at one of the facilities listed in *Ontario Regulation 58* under the *Blind Persons' Rights Act, 1990* to provide mobility, safety and increased independence for people who are blind.

Service animal(s): an animal is a service animal for a person with a disability if:

• It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or

• The person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

<u>Support person(s)</u>: means an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.

Section 3

Customer Service Standard

Purpose

M&R Property Management is committed to providing a high standard of goods, services, programs and facilities, where we will use reasonable efforts to ensure our practices are consistent with this policy. Following are the practices in which we currently engage to meet these standards:

Scope

All employees, contractors and agents who work on behalf of M&R Property Management and interact with members of the public or other third parties are expected to conduct themselves in accordance with this policy.

Core Principles

M&R Property Management will make every effort to ensure that this policy and related practices and procedures are consistent with the following four core principles:

- *Dignity*: Persons with disabilities must be treated as valued customers as deserving of service as any other customer.
- Equality of Opportunity: Persons with disabilities should be given an equal opportunity to obtain, use and benefit from the M&R Property Management's goods and services.
- Integration: Wherever possible, persons with disabilities should benefit from M&R Property Management's goods and services in the same place and in the same or in a similar manner as any other customer. In circumstances where integration does not serve the needs of persons with disabilities, goods and services will, to the extent possible, be provided in another way that takes into account the person's individual needs.
- Independence: Goods and services must be provided in a way that respects the independence of persons with disabilities. To this end, M&R Property Management will always be willing to assist persons with disabilities but will not do so without express permission.

AODA Training

M&R Property Management is committed to training all of our employees, volunteers, agents and third parties who interact with customers on the Customer Service Standard, the Integrated Accessibility Standards Regulations and the Ontario Human Rights Code as it relates to persons with disabilities.

Training will be provided to all new hires as well as on an ongoing basis as a refresher or when changes are made to the Accessibility Policy.

Training will include:

- The purpose of the Accessibility for Ontarians with Disabilities Act (AODA) and the Customer Service Standards requirements.
- Our policies related to the Customer Service Standards
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person
- The Integrated Accessibility Standards Regulations and the Ontario Human Rights Code as is pertains to persons with disabilities.

M&R Property Management will keep records of the training provided, including the dates on which training was completed and the names of the participants.

Communication

M&R Property Management strives to communicate with persons with disabilities in a manner that takes into account the person's disability. Communication strategies are set out in the Company's accessibility training program.

M&R Property Management is committed to providing accessible invoices and, upon request, our invoices will be provided in alternate formats. M&R Property Management will answer any questions that customers may have about the content of the statement in person, by telephone or email.

Assistive Devices

Persons with disabilities are permitted to use their own assistive devices when on M&R Property Management's premises for the purposes of obtaining, using or benefiting from M&R Property Management's goods and services.

If there is a physical, technological or other type of barrier that prevents the use of an assistive device on the M&R Property Management's premises, we will make best efforts to remove that barrier. If we are not able to remove the barrier, we will ask the individual with the disability how they can be accommodated, what alternative measures would enable equal access to M&R Property Management's goods and services and M&R Property Management will make its best effort to provide the individual with alternative means of assistance.

Guide Dogs and Service Animals

Persons with disabilities that are accompanied by a guide dog or service animal will be allowed to access M&R Property Management's premises that are open to the public and keep the animal with him or her unless otherwise excluded by law. If a guide dog or service animal must be excluded from the premises, M&R Property Management will provide the individual with the reasons for the exclusion and explore alternative ways to meet the individual's needs.

Support Persons

Persons with disabilities may enter premises owned and/or operated by M&R Property Management with a support person and have unobstructed access to the support person while on the premises.

M&R Property Management may require persons with disabilities to be accompanied by a support person where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises. Before making this decision, we will: (a) consult with the person who has a disability regarding their needs; (b) consider the health and safety reasons based on available evidence; and (c) determine whether there is another reasonable way to protect the health and safety of the person who has a disability or others on the premises. If a support person is required, we will waive any admission fees or fares for the support person.

Notice of Temporary Disruptions

M&R Property Management will notify customers if there is a planned or unexpected disruption of facilities or services typically used by persons with disabilities in order to access M&R Property Management's goods and services. The notice will be posted at the entrance of the affected premises and on our website.

The notice will include the following information:

- The facility or service that is unavailable;
- The anticipated duration of the disruption;
- The reason for the disruption; and
- Alternative facilities or services, if available.

Feedback

At M&R Property Management, we are continually striving to improve accessibility. Feedback, questions, or suggestions regarding accessibility is welcomed. M&R Property Management will ensure that its process for receiving and responding to feedback is accessible as required or requested.

Feedback can be provided in the following ways:

In writing:

M&R Property Management 3520 Pharmacy Avenue, Unit 1 Toronto, ON M1W 2T8

Phone: 416-499-9350 Fax: 416-499-5312

By email:

aoda@mandrholdings.com

Documentation Made Available

This policy is made available to any member of the public upon request. This policy will also be posted on our Intranet and in a conspicuous place in the workplace.

Format of Documents

M&R Property Management will provide documents, or the information contained in documents, required to be provided under the Customer Service Standard, to persons with disabilities in a format that takes into account the person's disability. M&R Property Management currently offers Large-Print digital formats of our policies; however, we can arrange for alternate formats upon request. We can also arrange for accessible feedback upon request.

Workplace Emergency Response Information

In addition to providing customers with disabilities with full accessibility to goods and services at all times in a way that respects their dignity and independence, M&R Property Management is committed to providing employees with disabilities with the same opportunities as other employees. With this in mind, M&R Property Management will provide individualized workplace emergency response information to all employees with a visible or non-visible disability, if the individual so requires. This information can also be provided to the employee who is designated to assist the employee with disabilities.

Section 4

Information and Communications Standards

M&R Property Management will create, provide and receive information and communications in a way that is accessible for persons with disabilities.

Feedback

M&R Property Management will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request.

Accessible Formats

Upon request, we will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes in account the person's accessibility needs. M&R Property Management will work collaboratively with the person making the request to determine the suitability of an accessible format or communication support. We will also notify the public about the availability of accessible formats and communication supports.

Accessible Website

M&R Property Management will ensure that its new internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines ("WCAG").

M&R Property Management will also take action to ensure that its internet websites and web content conform with WCAG 2.1 (except where this is impracticable), as outlined by the IASR. The requirements of WCAG 2.1 will be met by M&R Property Management by June 15, 2024

Section 5

Employment Standards

M&R Property Management will identify, prevent and remove barriers at all stages of the employment life cycle for persons with disabilities.

Recruitment, Assessment and Selection Processes

M&R Property Management will notify job applicants about the availability of accommodation for persons with disabilities in its recruitment process. We will also notify job applicants when they are selected to participate in an assessment or selection process that accommodations are available upon request. If a selected applicant requests an accommodation, we will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs.

Notice to Successful Applicants

When making offers of employment, M&R Property Management will notify the successful applicant of its policies for accommodating employees with disabilities.

<u>Informing Employees of Supports</u>

M&R Property Management will continue to inform employees of its policies and any updates to those policies used to support employees with disabilities, including policies on the provision of job accommodation that take into account an employee's accessibility needs. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

M&R Property Management will endeavor to communicate with it's employees with disabilities in ways that consider their disability. We will, upon request, and in consultation with the person making the request, provide or make arrangements for accessible format or communication supports for them. Accessible formats and communication support shall be provided in a timely manner taking into account the person's accessibility needs.

Workplace Emergency Response Information

M&R Property Management will provide individualized workplace emergency response information to employees with disabilities if we are made aware of the need for accommodation. M&R Property Management will provide this information as soon as practicable after becoming aware of the need for accommodation.

In circumstances where an employee requires assistance, we will, with the consent of the employee, provide the workplace emergency response information to those designated by M&R Property Management to provide assistance to the employee (e.g., immediate supervisor, Health and Safety Officer, etc). This process is documented in the Fire Safety Plan.

Individualized workplace emergency response information will be reviewed when an employee moves to a different location within the office, when the individual's overall accommodation needs or plans are modified when, from time-to-time, M&R Property Management will review its general emergency response plans.

Return to Work Process

M&R Property Management will develop, document and have in place a return-to-work process for employees who have been absent from work due to a disability, and who require disability related accommodations in order to return to work. Such processes will be documented and will outline the steps M&R Property Management will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

<u>Performance Management, Career Development and Advancement and</u> Redeployment

M&R Property Management will take into account the accessibility needs and individual accommodation plans of employees with disabilities in the performance management process, when providing career development and advancement opportunities, and when considering redeployment.

Section 6

Design of Public Spaces

Where M&R engages in construction or reconstruction of regulated public spaces, such construction or reconstruction shall comply with the requirements of the Integrated Accessibility Standard.

Definition of Public Spaces

Public spaces include recreational trails/beach access routes; outdoor public eating areas; outdoor play spaces; outdoor paths of travel; accessible off street parking; and service-related elements (i.e. service counters, fixed queuing lines and waiting areas).

Disruption

M&R will endeavour to prevent or minimize service disruptions to the accessible parts of its public spaces. In the event of a service disruption, M&R will notify the public of the service disruption and alternatives available.

Maintenance

M&R shall specifically consider procedures for preventative and emergency maintenance of the accessible elements in public spaces to minimize the disruption in access to the accessible parts of its public spaces.

Section 7

General Policy Information

This Policy was last updated in June 2024.

M&R Property Management will review and update this policy as necessary, on an ongoing basis.