ATS Healthcare – ACA Accessibility Plan

Effective Date: June 1, 2023

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<u>General</u>

Accessibility Statement

ATS Healthcare is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers and any visitors who enter the premises, access information provided by the company, or use the company's goods and services.

The Company will work to identify and remove barriers, and prevent new barriers, for persons with disabilities as they relate to employment, the built environment, information and communication technologies, communication, procurement of goods, services and facilities, design and delivery of programs and services and transportation at ATS Healthcare. This policy outlines the company's accessibility plan and strategy for identifying, removing and preventing these barriers.

- identifying and meeting the accessibility needs of persons with disabilities in an
 effective, appropriate, and timely manner through compliance with the Accessible
 Canada Act and its regulations (collectively, the "ACA"); and
- developing an inclusive, barrier-free environment that is guided by the principles of the ACA, which include dignity, independence, integration (except when alternate measures are necessary to meet the needs of persons with disabilities), and equal opportunity.

Feedback

ATS Healthcare is dedicated to receiving and addressing feedback concerning accessibility for individuals with disabilities in Canada. If you have any concerns or suggestions regarding accessibility matters, please reach out to our Human Resources Manager using the contact information provided below:

By Mail:

Attn: Human Resources ATS Healthcare 100 Vaughan Valley Blvd. Vaughan, ON L4H 3C5

By Phone: 416-744-4900

By Email: accessiblefeedback@ats.ca

We will strive to address inquiries promptly upon receiving them.

1. <u>Employment</u>

ATS Healthcare's policies and practices are intended to build an inclusive and accessible work environment that is free from discrimination and harassment.

Recruitment Assessment and Selection:

ATS Healthcare notifies the public and team members of the availability of accommodation during the recruitment process including any assessments that may be requested. Upon request, the company will consult with the applicant and arrange for suitable accommodations that meets the needs of the applicant.

Upon offer of employment, ATS Healthcare shall notify the successful applicant of its policies for accommodating employees with disability. Additionally, the organization shall inform all current employees of its policies to support individuals with disabilities.

Accessible Formats and Communication Supports for Employees:

ATS Healthcare will ensure employees are aware of policies for employees with disabilities and any changes to these policies as they occur. The company will provide the information required to new employees as soon as practicable after they begin their employment.

If an employee with a disability requests it, the company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information is that is generally available to all employees in the workplace.

The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support. ATS Healthcare reserves the right to determine the Accessible Format or Communication Support that will be provided.

Workplace Emergency Response Information:

ATS Healthcare will create individualized workplace emergency response plans for employees with disabilities who require them. The information will be created in consultation with the associate and take into account the unique challenges created by the individual's disability and the physical nature of the workplace.

Upon request or disclosure of a team member's need for assistance during any emergency situations, and with consent, the organization will designate a colleague to provide such individualized assistance and will provide the colleague with the team member's individualized emergency response information.

This information will be reviewed when:

- The employee moves to a different physical location in the organization
- The employee's overall accommodation needs, or plans, are reviewed; or
- The company reviews general emergency response policies

Documented Individual Accommodation Plans:

ATS Healthcare has in place a written process for documenting individual accommodation plans for employees with disabilities. The plans include:

- The ways in which the employee can participate in the development of the plan
- The means by which the employee is assessed individually
- The ways that an employer can request an evaluation by an outside medical expert or other experts (at the employer's expense) to determine whether accommodation can be achieved, or how it can be achieved.
- The ways that an employee can request the participation of other representative from the workplace for the creation of the accommodation plan
- The steps taken to protect the privacy of the employee's personal information
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done.
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.
- Accessible formats, communication supports (upon request), any other accommodation provided.

Return to Work Plans:

ATS Healthcare employees who are absent from work due to a disability and require disability-related accommodations to return to work will follow our Return-to-Work Program.

The process outlines procedures the company will take to enable a safe return to work for the employee. All steps and individual accommodation plans will be documented and created in consultation with the employee.

Performance Management and Career Changes:

ATS Healthcare will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

2. <u>The Built Environment</u>

ATS Healthcare does not currently own, develop or maintain public space, but if it does in the future, it will comply with all legal requirements with respect to the built environment and accessibility.

In its existing premises, ATS Healthcare is committed to identifying, removing or remediating, and avoiding barriers to access for persons with disabilities, including working with landlords and property owners/managers where such premises are not owned by ATS Healthcare. Without limiting the generality of the foregoing, ATS Healthcare will develop (a) procedures for preventative and emergency maintenance of accessible elements that are within ATS Healthcare's control, and (b) procedures for

dealing with temporary disruptions when accessible elements in ATS Healthcare's premises are not in working order.

All ATS Healthcare facilities contain accessible parking, and most facilities have accessible exterior paths of travel, such as ramps, wheelchair accessibility to the facility and restrooms, office signage with braille name tags, and more.

3. Information and Communication Technologies

Accessible Formats and Communication Supports:

Unless deemed unconvertible, ATS Healthcare will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

ATS Healthcare will account for the person's accessibility needs when customizing individual requests and will consult with the individual making the request to ensure suitability.

ATS Healthcare will make the availability of accessible formats and communication supports publicly known.

Emergency Procedures, Plans or Public Safety Information

ATS Healthcare will ensure that all publicly available safety and emergency information, such as evacuation procedures and floor plans, are provided in an accessible format or with appropriate communication supports upon request.

Accessible Websites and Web Content

ATS Healthcare will ensure that our website and web content conform to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR and will refer to the legislation for specific compliance deadlines and requirements.

Exceptions

The information and Communication Technologies standards do not apply to:

- Products and product labels
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship

Unconvertible Information or Communications

If it is determined in consultation with the requesting party that information or communications are unconvertible, ATS Healthcare will ensure that the individual who made the request is provided with an explanation and a summary of the information.

4. Communication (Other than Information and Communication Technologies)

Upon request, ATS Healthcare will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, including employees, in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.

ATS Healthcare will consult with the person making the request for an accessible format or communication support when determining the suitability of an accessible format or communication support.

ATS Healthcare will advise the public about the availability of accessible formats and communication supports with respect to our feedback processes through a notification on our company website.

5. <u>Procurement of Goods, Services, and Facilities</u>

If and where applicable, ATS Healthcare will ensure that we adhere to the general obligations and specific requirements of applicable accessibility legislation in relation to ATS Healthcare's procurement of goods, services and facilities.

6. <u>Design and Delivery of Programs and Services</u>

ATS Healthcare will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

Ensuring that all customers receive the same value and quality.

7. <u>Transportation</u>

This requirement is not currently applicable to ATS Healthcare.

8. <u>Training</u>

ATS Healthcare will provide training on the requirements of the accessibility standards referred to in the Act and on the Human Rights Code as it pertains to persons with disabilities. We will train our employees and volunteers on accessibility as it relates to their specific roles.

Training will be provided to all persons to whom this Policy applies as soon as practicable after they are assigned the applicable duties. Training will continue as necessary on an on-going basis in connection with any changes of policies, practices and procedures governing this policy.

Records of the training provided, including names of individuals trained, and training dates shall be maintained in accordance with the requirements of the Act.

Consultations

Through valuable communication and discourse, ATS ensure a continuous process of

improvement, while working towards establishing a setting in which the full involvement of individuals is possible.

ATS consulted with focus groups in each of our locations across the country to elicit feedback about barriers related to accessibility in their locations. Input was used to help build this plan. The groups were comprised of mixes of human resources professionals, leaders and health and safety specialists.

ATS will continue to encourage feedback regarding its accessibility plan through the use of its feedback process and with on-going communication with our focus groups. ATS will also continue to gather feedback through the use of employee engagement surveys which give all ATS employees an opportunity to provide feedback on a wide variety of topics, including accessibility and inclusion

<u>Glossary</u>

Where used in this Policy, certain terms are defined as follows, pursuant to the ACA:

Barrier: anything – including anything physical, architectural, technological, or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice – that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment or a functional limitation

Disability: any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment – or a functional limitation – whether permanent, temporary, or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society