



HUMAN RESOURCES POLICIES AND PROCEDURES

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Approved by : Louisa Furtado, VP HR Ontario and Health & Safety Date: January 1, 2017	➤ Intranet – HR Policies and Procedures <input checked="" type="checkbox"/> <u>DISTRIBUTION:</u> ➤ All Mgmt. & Prof. Employees <input checked="" type="checkbox"/> ➤ All Adm. Support Employees <input checked="" type="checkbox"/> ➤ All Bargaining Unit Notice Boards <input checked="" type="checkbox"/> ➤ All Interns, and Third Party Workers <input checked="" type="checkbox"/> ➤ Internet - Public <input checked="" type="checkbox"/>

Information and Communications, Employment, Customer Service, and Public Spaces

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1. Purpose

Under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) all public and private sector organizations must meet certain accessibility standards established by regulation. This policy implements the *Integrated Accessibility Standards Regulation* (the “Regulation”) in the areas of Employment, Information and Communications, Customer Service, and Public Spaces, as applicable, for Metro Ontario Inc. and Metro Ontario Pharmacies Limited (together “Metro” or the “Company”) in accordance with Ontario Regulation 191/11.

Accessible Formats

This document is made available in alternative formats upon request. You can view this document at www.metro.ca or www.foodbasics.ca or call us toll free at 1-877-763-7374 to request a copy in a format that takes into account a person’s disability. Metro and its Staff and customers with disabilities may agree on the format to be used.

2. Statement of Commitment

Metro is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment is integrated wherever possible and ensures that persons with disabilities benefit from the same goods and services, in the same place, and in a similar way as other customers. Metro supports the full inclusion of persons with disabilities in a timely manner as set out in the AODA and in the Ontario *Human Rights Code* (the “Code”).

Metro is committed to ensuring that every Staff member receives equitable treatment with respect to employment and every customer receives equitable treatment with respect to services, without discrimination, and receives accommodation where required, in accordance with the provisions of the *Code*, the AODA, and the *Regulation*.

POLICY APPLICATION

This policy applies to all Staff and customers of Metro who are entitled to the protections set out in AODA in their interactions with Metro, as described in greater detail below.

DEFINITION OF DISABILITY

AODA defines “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*.

Where required, Metro makes all reasonable efforts to meet the needs of disabled customers and Staff members in a timely manner.

MEANS OF ACHIEVING METRO'S ACCESSIBILITY OBJECTIVES

This policy, related policies, and the Metro Ontario Inc. *Multi-Year Accessibility Plan* outline Metro's strategies and actions to prevent and remove barriers to accessibility and to meet the requirements under *AODA* and the *Regulation*.

ACCESSIBLE FORMATS

All of the aforementioned documents are available in accessible formats upon request.

3. Scope

This policy is drafted in accordance with the *Regulation* and addresses how the Company achieves accessibility through meeting the *Regulation's* requirements. It provides the overall direction that the Company follows to provide accessibility supports to Ontarians with disabilities.

The requirements of the *Regulation* for the Company include the following four sections:

- Establishment, implementation, maintenance, and documentation of a *Multi-Year Accessibility Plan* (the "*Plan*"), which outlines the Company 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 of Staff; and
- Other specific applicable requirements under the Information and Communications, Employment, Customer Service, and Public Spaces standards (the Transportation standard under the *Regulation* does not apply to Metro).

4. Definitions

Below is a list of definitions in alphabetical order used in this Policy:

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.

Employee means an individual who is under a contract of service with Metro.

IAP means Individualized Accommodation Plan.

IASR means Integrated Accessibility Standards Regulation.

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

Intern means a student or trainee who works, sometimes without pay, at a trade or occupation in order to gain work experience.

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.

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

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.

Medical Aid means an assistive device including but not limited to: respirators, and portable oxygen supplies.

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.

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

Redeployment means the reassignment of Employees with disabilities to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Staff means the Employees, interns, agents, contractors, suppliers representatives and the like, who work in Metro workplaces and may provide goods and/or services to customers within Metro stores, or on its behalf.

Unconvertible means if it is not technically feasible to convert the information or communications. It also means if 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.

5. General Provisions

This section covers the general requirements of the *Regulation*.

Multi-Year Accessibility Plan

The Company's *Multi-Year Accessibility Plan* outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the *AODA*. The Company reports every three years on the progress and implementation of the *Plan*, post the information to the Company website, and provides it in accessible formats upon request. The *Plan* is reviewed and updated at least once every five years. The *Plan* is complete and is available on the www.metro.ca and www.foodbasics.ca websites.

Training – General

The Company ensures that training is provided to all Staff on the requirements of the accessibility standards referred to in the *Regulation* and on the *Human Rights Code* as it pertains to persons with disabilities. Training has been provided to current staff as of the implementation of the accessibility standards, and is provided to new-hires on an ongoing basis. Training is provided in a way that best suits the duties of Staff. If any changes are made to this policy or the *Regulation*, training will be provided to include those changes. The Company maintains a record of the dates when training was provided and to whom it was provided. The Company takes reasonable steps to ensure that others that provide goods, services, or facilities on behalf of the Company have had training.

Training – Customer Service

The Company ensures that its Staff is trained on the requirements of the *Regulation* and this *Policy* as they pertain to customer service. Such training includes:

- a) How to interact and communicate with persons with various types of disability;
- b) How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or service animal or the assistance of a support person;
- c) How to use equipment or devices available on the Company's premises or otherwise provided by the Company that may help with the provision of goods, services, or facilities to a person with a disability; and
- d) What to do if a person with a particular type of disability is having difficulty accessing the Company's goods, services, or facilities.

The Company keeps records of the training, the dates on which it has been provided, and the people trained.

The Company gives notice of this document, which describes the Company's training policy, by posting it in a conspicuous place or making it available on the Company's website, and making this document available in accessible formats upon request.

Self-Service Kiosks

The Integrated Accessibility Standard Regulation requires that the Company must have regard to accessibility for persons with disabilities when designing, procuring, or acquiring self-service kiosks. The Company continues to work with its third-party suppliers of kiosks and third-party licensees to comply with this provision.

6. Customer Service Standard

The Customer Service Standard applies to Staff who provide goods and/or services to customers within Metro stores, or on its behalf.

Metro is committed to providing appropriate customer service to customers with disabilities. Metro's implementation of the Customer Service Standard is based on and adheres to the core principles of independence, dignity, integration, and equality of opportunity, for customers with disabilities.

Staff must respond to customers requiring accessible customer service in a respectful manner, with the appropriate accessibility tools that Metro has available.

Confidentiality:

All interactions between customers and Staff of Metro regarding the application of this policy are considered confidential and will be disclosed only as required to provide appropriate customer service or as required by law.

Implementation

In its implementation of the Customer Service Standard, the Company:

- a) Provides goods, services, and/or facilities to persons with disabilities in a way that is integrated with the provision of goods, services, and/or facilities to others, unless an alternative measure is necessary;
- b) Provides persons with disabilities an equal opportunity as compared to others to obtain, use, and benefit from the goods, services, and/or facilities; and
- c) When communicating with a person with a disability, does so in a manner that takes into account the person's disability.

Use of Service Animals and Support Persons

The Company:

- a) Ensures that persons with guide dogs or other service animals are permitted to enter the Company's premises with their animals and to keep their guide dogs or service animals with them, unless the animal is otherwise excluded by law;

- b) Whenever a guide dog or service animal is excluded by law, ensures that other measures are available to enable a person with a disability to obtain, use, or benefit from the Company's goods, services, and/or facilities;
- c) If a person with a disability is accompanied by a support person, ensures that both persons are permitted to enter the Company's premises and that the person with the disability is not prevented from having access to the support person while on the premises; and
- d) Only requires a person with a disability to be accompanied by a support person after consulting with the person with a disability, considering the available evidence, and determining that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises and that there is no other reasonable way to protect health and safety.

Notice of Temporary Disruptions

If there is a temporary disruption in any particular facilities or services used by persons with disabilities to obtain, use, or benefit from the Company's goods, services, or facilities, the Company:

- a) Gives notice of the disruption to the public;
- b) Sets out the steps that the provider must ensure are taken in connection with a temporary disruption, as follows:
 - a. Determine alternatives to the disrupted facility or service;
 - b. Arrange repairs or maintenance on the disrupted facility or service, as soon as practicable, and obtain an estimate of the time to effect such repairs or maintenance; and,
 - c. Post a conspicuous notice of the disruption on Company premises proximate to the place of the disruption and/or on the Company website, stating:
 - i. The reason for the disruption;
 - ii. The anticipated duration of the disruption as determined under (b);
 - iii. Alternative services or facilities which may have been identified under (a);
 - iv. A mode of contacting the Company for additional information with respect to the service disruption; and,
 - v. That a copy of the Notice and a copy of this Policy are available on request and in accessible formats.

Feedback

Feedback regarding Metro's provision of goods and/or services to customers with disabilities can be made by: website at www.metro.ca and www.foodbasics.ca, toll free phone number at 1-877-763-7374, Customer Comment Card which is available at our Stores, in writing to Metro Ontario Inc. Accessibility Commitment, 5559 Dundas St. West, Toronto ON M9B 1B9, or in person to Store Management. All feedback will be

directed to the Customer Care Department. A response will be provided within thirty days of receipt.

Metro takes steps to ensure the accessibility of its feedback processes.

- a) Metro's feedback process also accepts feedback about whether the feedback process itself is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.
- b) If the Company receives a complaint about the manner in which it provides goods, services, or facilities to persons with disabilities, the Company considers the complaint in good faith, and where possible and where permitted communicates with the person making the complaint regarding the potential resolution of the issue raised.
- c) Where a person with a disability requests access to the feedback process or a copy of this or any other feedback process-related document in an accessible format, the Company provides that document or information in an accessible format or otherwise provides communication support, in consultation with the person making the request and in a timely manner that takes into account the person's accessibility needs due to disability, at a cost that is no more than the regular cost charged to other persons.

7. Information and Communications Standard

The Company creates, provides, and receives information and communications in ways that are accessible to people with disabilities.

If the Company 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, the Company provides 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.

Accessible Emergency Information

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

The Company is committed to providing its customers with publicly available emergency information in an accessible way upon request. The Company provides Employees with disabilities with individualized emergency response information when necessary.

Accessible Formats and Communication Supports

The Company provides or arranges for accessible formats and communication supports for persons with disabilities upon request in a timely manner that takes into

account the person's accessibility needs due to a disability, and at a cost that is no more than the regular cost charged to other persons. The Company consults with the person making the request and determines suitability of an accessible format or communication support. The Company notifies the public about the availability of accessible formats and communication supports.

Website Accessibility

The Company makes any new internet website 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 backdated to 2012 will conform to WCAG 2.0 Level AA.

8. Employment Standard

The Employment Standard builds upon the existing requirements under the Ontario *Human Rights Code* in relation to how the Company will provide accessibility to its Employees throughout the employment cycle.

The requirements of the Employment Standard shall be met by the Company. For further clarification and specific details you can refer to the Company's Multi-Year Accessibility Plan.

Recruitment

The Company notifies Employees and the public about the availability of accommodations for applicants with disabilities according to the following three steps:

- i. During the recruitment process when positions are posted and when job applicants are individually selected to participate in an assessment or selection process;
- ii. If a selected applicant requests an accommodation, the Company consults with the applicant and provides or arranges for the provision of a suitable accommodation that takes into account the applicant's disability; and,
- iii. Notifies successful applicants of the policies for accommodating Employees with disabilities.

Employee Notification

The Company informs its Employees of its policies used to support its Employees with disabilities, including but not limited to, policies on the provision of job accommodation that take into account an Employee's accessibility needs due to a disability for the two situations below:

- i. As required to new Employees as soon as practicable after they begin their employment; and

- ii. 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 and Communication Supports

In addition and where an Employee with a disability requests it, the Company consults with the Employee to provide or arrange for the provision of accessible formats and communication supports considering the following two types of information:

- i. Information that is needed in order to perform the Employee's job; and
- ii. Information that is generally available to Employees in the workplace.

The Company consults with the Employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

The Company has a written process for developing a documented individual accommodation plan for Employees with a disability.

The Company's process is administered by the Health & Safety Department. This process provides for the participation of Employees in the development of the IAP, assessment on an individual basis, reasons wherever accommodation is denied, involvement of workplace representatives, periodic reviews of IAPs, availability of IAP-related information in alternative formats, and other procedures as required.

Return to Work

The Company has in place 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 processes are documented in the procedures of the Health & Safety Department and outline the steps that the Company will take to facilitate the return to work and include an IAP.

Performance Management, Career Development and Advancement, and Redeployment

The Company takes into account the accommodation needs and/or individual accommodation plans of Employees when:

- i. Using performance management processes;
- ii. Providing career development and advancement; and,
- iii. Using redeployment procedures.

Workplace Emergency Response Information

The Company provides individualized workplace emergency response information to Employees who have a disability if the disability is such that the individualized information is necessary and the Company is aware of the need for accommodation due to the Employee's disability. If the Employee who receives an individual workplace emergency response information requires assistance, with the Employee's consent the Company provides the workplace emergency information to the person(s) designated by the Company to provide assistance to the Employee.

The Company provides such information as soon as practicable after becoming aware of the need for accommodation due to the Employee's disability.

The Company reviews the individualized workplace emergency response information when the Employee moves to a different location in the Company, when overall accommodation needs or plans are reviewed, when the Employee's circumstances change, and when the Company reviews its general emergency response policies.

9. Public Spaces

The Company incorporates accessibility into public spaces covered by the *Regulation* that are newly constructed or redeveloped on and after January 1, 2017; following the existing requirements stated under the *Design of Public Spaces Standards (Accessibility Standards for the Built Environment Maintenance)* as applicable and provides maintenance and restoration of public spaces as applicable by ensuring the Company's Multi-Year Accessibility Plan includes procedures for preventative and emergency maintenance of accessible elements in public spaces as applicable; and procedures for dealing with temporary disruptions when accessible elements required under this part of the *Regulation* are not in working order. For further clarification and specific details, please refer to the Company's Multi-Year Accessibility Plan.

10. Specific Responsibilities

10.1 Employees

All employees are required to:

- comply with this *Policy* and any and all directives or instructions that may be given regarding its application;
- report immediately to their supervisor or Human Resources representative any situation which may involve a breach of this *Policy* or may put the Company at risk of violating its commitments under the *Regulation*;
- cooperate in any accommodation process, including by communicating any disability-related needs in a timely manner to the extent possible and providing any information which is reasonably required to advance the accommodation process; and,

- respect and facilitate any accommodation with regard to disability which may be provided to other employees or customers.

10.2 Human Resources

The Human Resources Department is responsible for drafting and updating this *Policy*, as well as implementing certain sections of this *Policy*, more specifically:

The Talent Management and Training Department is responsible for implementing the provisions of the *Policy* under the Employment Standard which relate to:

- Recruitment;
- Employee Notification;
- Accessible Formats and Communications Supports; and,
- Performance Management, Career Development and Advancement, and Redeployment.

The Talent Management and Training Department is also responsible for training the Company's employees with respect to this *Policy*, and more specifically with respect to the Customer Service Standard.

The Health & Safety Department is responsible for implementing the provisions of this *Policy* under the Employment Standard which relate to:

- Return to Work;
- Individual Accommodation Plans; and,
- Workplace Emergency Response Information.

10.3 Planning and Construction / Maintenance

The Planning and Construction and Maintenance Departments are responsible for implementing certain sections of this *Policy*, specifically;

- The Customer Service Standard as it relates to giving notice to persons with disabilities of temporary service disruptions which may occur as a result of maintenance or construction activity, such as the temporary removal from service of an elevator or wheel-chair ramp.
- The Design of Public Spaces Standards for applicable public spaces ensuring that all such spaces which are newly constructed or redeveloped on and after January 1, 2017 are designed to the specifications set out in the *Regulation*.

10.4 Corporate Affairs

The Corporate Affairs Department is responsible for implementing those aspects of the Customer Service Standard which involve providing persons with disabilities publicly available Company information in accessible formats, and with appropriate communications supports.

10.5 Operations (Supervision in Office, Discount, Conventional, and Distribution)

Supervisors and managers in Discount and Conventional Operations, the Office, and the Distribution Centres, are required to:

- comply with this *Policy* and any and all directives or instructions that may be given regarding its application;
- collaborate with Human Resources and Corporate Affairs to implement the provisions of the Customer Service Standard and Employment Standard, as applicable to each Company workplace;
- act immediately on any report of a situation which may involve a breach of this *Policy* or may put the Company at risk of violating its commitments under the *Regulation*, which action may include liaising with Human Resources, Corporate Affairs, and Planning and Construction / Maintenance, to address specific situations where necessary;
- record any action taken to comply with or implement the provisions of this *Policy* and/or *Regulation*.

11. Enforcement

Any Employee who breaches this *Policy* and/or fails to discharge his or her duties under this *Policy* may be subject to disciplinary action up to and including dismissal.

12. For More Information

For employment-related concerns regarding this *Policy* or the *Multi-Year Accessibility Plan*, please contact:

Metro Ontario Inc. – Human Resources

Phone: 1-800-268-2564

For all other inquiries regarding this *Policy* or the *Multi-Year Accessibility Plan*, please contact:

Metro Ontario Inc. – Customer Care

Phone: 1-877-763-7374

Web: www.metro.ca or www.foodbasics.ca