

ACCESSIBILITY POLICY ONTARIO

Department	Human Resources
Effective date	January 29, 2024
Last modification	N/A
Policy	HR-ON-1

1. Generalities

The Master Group and its affiliated and owned companies (hereinafter «Master») is committed to providing a barrier-free environment for all. The company continuously works to identify and remove barriers and prevent new barriers for persons with disabilities as they relate to employment, receipt of goods and services, the built environment, and information and communications.

Master also provides accessible employment in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations. This policy sets out the company's commitment to standards for accessible employment and outlines the company's strategy for identifying, removing, and preventing these barriers.

2. Statement of Commitment

Master is committed to providing an accessible environment for all clients, employees, job applicants, suppliers, and visitors who may enter our premises, access our information, or use our services. As an organization, we respect and comply with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations.

We strive to provide an accessible and welcoming environment for everyone by identifying and removing barriers in our workplace and ensuring that new barriers are not created. The company ensures that persons with disabilities are provided with equal opportunities. We are committed to meeting the needs of individuals with disabilities in a timely and integrative manner that respects their dignity and independence.

3. Scope

This policy applies to all employees, vendors, clients, customers, and others who enter Master workplaces across Ontario or are otherwise dealing with Master.

4. Definitions

Accessible formats: Includes but not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Assistive device: Any medical device, mobility aid, communication aid, or other aid that is specially designed to assist a person with a disability with a need related to their disability.

Communication supports: Includes but not limited to captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

Constructive discrimination: Also referred to as adverse effect, is discrimination that unintentionally singles out a particular group, resulting in unequal treatment.

Conversion-ready: An electronic or digital format that facilitates conversion into an acceptable format.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

Mobility aid: Any manual or electric wheelchair, scooter, boarding chair, walker, cane, crutch, prosthesis, or other aid that is specially designed to assist a person with a disability with a need related to mobility.

Redeployment: The reassignment of an employee to another department or job in the company as an alternative to layoff when their job or department has been eliminated by the company.

Service animal: An animal that can be recognized by visual indicators such as a vest or harness that is being used by an individual with a disability for reasons relating to the person's disability.

Support person: Another person who accompanies an individual with a disability in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

ACCESSIBILITY POLICY ONTARIO

Department	Human Resources
Effective date	January 29, 2024
Last modification	N/A
Policy	HR-ON-1

5. Guidelines

5.1 Employment

Master makes every effort to identify, remove, and prevent barriers to employment by developing inclusive procedures that support and accommodate persons with disabilities throughout their recruitment and employment. Whenever a candidate requires accommodation to enable them to fully participate in the recruitment and selection process, or a current employee requires accommodation in the workplace, the company works with the individual to provide such accommodation up to the point of undue hardship.

The accessibility needs of employees with disabilities are also considered in all aspects of the employment relationship, including during performance management processes, career development or advancement opportunities, in the event of redeployment, etc.

5.1.1 Job Design

Master proactively conducts thorough job analyses to ensure new and existing job requirements are bona fide occupational requirements: that is, reasonable and made in good faith. To determine whether a requirement is bona fide, the company ensures the following:

- The requirement achieves a goal that is rationally connected to performing the job;
- The requirement is adopted in good faith and fulfills a legitimate work-related purpose; and
- The requirement is reasonably necessary to accomplish a work-related process or task.

Where a requirement is not bona fide, the company evaluates and determines whether reasonable accommodations can be provided to individuals to achieve equal opportunity in the workplace. The company always works to ensure job design is non-discriminatory, including assessing jobs and working requirements for the potential of constructive discrimination.

5.1.2 Recruitment and Hiring

Master completes recruitment and selection activities in a way that ensures dignity and inclusion for all who participate. Upon request, the company provides candidates with reasonable accommodations during the interview and selection process. The company consults with the candidate to arrange suitable, personalized accommodations, such as providing the application in an alternate or accessible format.

Master is committed to hiring decisions that are unbiased and based on qualifications and experience. The company interview process focusses on experience and skills and will not discriminate against candidates who have a disability or require an accommodation, whether it is required during the interview process or would be required if the candidate were hired. Successful candidates are made aware of policies and supports for accommodations upon completion of the recruitment process.

5.1.3 Accessible Workplace Information

Master ensures that new employees are aware of the policies and supports available for employees with disabilities as soon as reasonably possible after beginning employment and all employees are informed of any updates to existing policies.

Upon request, the company provides or arranges for the provision of accessible formats and communication supports for employees with disabilities regarding information needed to perform their job and other information that is generally available to all employees in the workplace. An employee who requires workplace information in an accessible format or with communication supports should contact their supervisor and Human Resources Business Partner (HRBP). The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

5.1.4 Training and Development

Master recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for all employees. To this end, all employees are treated equally regarding training opportunities, and the company does not discriminate against employees who require accommodation when considering eligibility for training and development.

The company aligns training and development programs to meet the needs of employees with disabilities and provides training as soon as reasonably practicable upon the person being assigned to applicable duties. Training programs are designed with flexibility to allow customization for the individual requirements of the employee, such as providing training materials in accessible or conversion-ready formats that take into account the need of the employee. The company considers employee barriers when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.

ACCESSIBILITY POLICY ONTARIO

Department	Human Resources
Effective date	January 29, 2024
Last modification	N/A
Policy	HR-ON-1

5.1.2 Emergency Response

If necessary or upon request, Master creates individualized workplace emergency response plans for employees with disabilities. The emergency response plan considers the unique challenges created by the individual’s disability and the physical nature of the workplace and is created in consultation with the employee. If an employee with a disability requires assistance from a support person during an emergency, the company designates a fellow mutually agreed upon employee to act as such. Where necessary, this employee will have the required first aid training and certification necessary to provide emergency support.

Customized emergency response plans are reviewed when:

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

5.1.6 Individual Accommodations

Master creates and documents individual accommodation plans for employees with disabilities upon request. An employee with a disability who requires an individual accommodation plan should inform their supervisor, who will be in contact with their HRBP. These plans include:

- Information regarding accessible formats and communication supports, where requested;
- Individualized workplace emergency response information, where necessary; and
- Details of any other accommodation provided.

Where an employee is absent from work due to a disability and requires accommodations to return to work, the company will develop and document individual return-to-work processes (see section 4.1.7 Return to work).

Master provides workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of reasonable accommodation exist, or where the creation of accommodation would create a health and safety hazard or cause unreasonable costs for the organization.

Where a necessary accommodation is found to cause undue hardship on the organization, the company will work to find a fair and equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.

5.1.7 Return to Work

Master provides a supportive return-to-work program and develops and implements return-to-work processes for employees who are absent from work due to a disability and require accommodations to return to work. The company works with the employee to develop an individualized return-to-work plan and support the employee in the transition period by identifying and eliminating or reducing any barriers. The return-to-work process outlines the steps the company will take to facilitate the employee’s return to work and any individualized accommodation needs.

5.1.8 Redeployment

If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, Master will consider redeployment by placing the employee in an alternative position in the company. Depending on the employee’s needs, redeployment to an alternative position may be temporary or permanent. The company will work with the HRBP, the Health, Safety and Wellness Advisor and the employee to determine whether there is another available and suitable position to accommodate the employee’s needs. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

**ACCESSIBILITY POLICY
ONTARIO**

Department	Human Resources
Effective date	January 29, 2024
Last modification	N/A
Policy	HR-ON-1

5.2 Client Service

5.2.1 Access to Goods and Services

Master seeks to provide barrier-free access to the company’s goods and services for all clients. Where barriers cannot be removed, alternate means for accessing goods or services are provided to the best of the company’s ability.

5.2.2 Support Persons and Service Animals

If a customer with a disability is accompanied by a support person, Master ensures that both persons may enter the premises together and that the customer is not prevented from having access to the support person. A customer with a disability accompanied by a service animal may access premises that are open to the public unless otherwise excluded by law.

The company attempts to accommodate the customer and support person to sit with one another. In situations where confidential information might be discussed, consent is obtained from the customer before any potentially confidential information is mentioned in front of the support person.

5.2.3 Communication

Master understands the importance of accessible digital and non-digital forms of communication and does its best to provide accessible types of communication and information to all individuals with disabilities. Such accessible formats and communication supports are provided upon request, in a timely manner and at no additional cost.

5.2.4 Service Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Master. In the event of any temporary disruptions to facilities or services that clients with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice.

When disruptions occur, the company will:

- Post notices in the nearest accessible entrance to the service disruption;
- Update the company website with information about the disruption; and
- Contact clients with reservations or appointments by any method that may be reasonable under the circumstances.

The company makes every reasonable effort to indicate when services will resume and suggest alternatives that can be used during the disruption. In some circumstances, such as in the situation of unplanned temporary disruptions or emergencies, notice may not be possible.

5.2.5 Emergency Notifications

Master provides emergency and public safety information, plans, procedures, maps and warning signs at evacuation points, and any other emergency alert information in accessible formats or with appropriate communication supports, upon request. Alarm systems are both auditory and visual.

The company will:

- Work with any individuals requesting information to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and
- If a person with a disability requires assistance in an emergency, make sure an employee is available to assist.

5.3 Feedback

Master acknowledges that customer and employee feedback can lead to improved service, increased clientele, a reduction in complaints, improved working conditions, and an improved workplace culture, especially as it applies to accessibility. The company ensures that feedback can be provided by persons with disabilities through various methods. Feedback forms, along with alternate accessible methods of providing feedback, are available upon request.

Individuals who provide formal feedback receive acknowledgement of their feedback, along with information regarding any resulting actions based on their submitted concerns or complaints.



ACCESSIBILITY POLICY ONTARIO

Department	Human Resources
Effective date	January 29, 2024
Last modification	N/A
Policy	HR-ON-1

Feedback can be submitted to the Human Resources Department:

Email: HR@master.ca

Mailing address:

The Master Group
A/S Human Resources Department
1675, boul. de Montarville
Boucherville, QC J4B 7W4

Phone number: 514-527-2301

Confidential HR fax: 450-645-2294

Confidential Ethics hotline (employees only): 1-844-862-6621

Feedback can be provided anonymously if desired, and feedback remains confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. The personal information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.

5.4 Building Accessibility

Master works to ensure that the built environment, including building interiors and exteriors, is designed to facilitate barrier-free access to goods, services, and employment for customers and employees. If areas of the built environment are not accessible for certain individuals with disabilities, the company will work with the individual to provide an alternate means of access up to the point of undue hardship.

6. Acknowledgement and Agreement

I, _____, acknowledge having read and understood Master’s Accessibility Policy (AODA). By signing below, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules set forth in this policy, I may face disciplinary action up to and including termination of employment.

Name (printed)	
Signature	
Date (day/month/year)	