



ACCESSIBILITY POLICY

1. Statement of Commitment

Crestview Strategy Inc. (“**Crestview**” or the “**Company**”) is committed to treating all people in a way that allows them to maintain their dignity and independence. We will endeavour to provide our goods and services in a way that respects the independence and dignity of all persons and encourages integration and equality of opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”) and Ontario’s accessibility laws.

2. Definitions

Assistive Devices – Devices that include technical aids, communication devices, medical aids and other supports that are used by persons with disabilities to enable them to carry out the activities of daily living.

Barrier - Anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, information or communications barriers, an attitudinal barrier, a technological barrier, a policy or practice.

Disability – As defined by the AODA and the Ontario *Human Rights Code*, a disability is:

- 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,
- A condition of mental impairment or a developmental disability,
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- A mental disorder, or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Service Animal – An animal, including a guide dog, used by a person with a disability for reasons relating to his or her disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability, or where the person provides a letter from a regulated health professional, such as a physician, optometrist, occupational therapist or nurse confirming that he or she requires the animal for reasons relating to his or her disability.

Support Person – A person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services. A support person can be a paid professional, a volunteer, a friend or a family member.

3. Communication



Crestview will communicate with persons with disabilities in ways that take into account their disability and respects their dignity.

4. Assistive Devices

Crestview is committed to serving people with disabilities who use assistive devices to access our goods and services. Persons with disabilities may use their assistive devices as required in accessing goods and services provided by Crestview. Exceptions may occur if Crestview determines that the assistive device may pose a health and safety risk to the person with a disability or to others. In such cases, Crestview will make every effort to ensure that other measures are made available to enable the person with a disability to access Crestview's services.

It is the responsibility of the person using the assistive device to ensure that the assistive device is operated in a safe and controlled manner at all times.

Crestview will provide assistive devices to persons with disabilities where reasonable and necessary.

5. Support Persons

Crestview is committed to serving people with disabilities who are accompanied by a support person in order to access our goods and services. Any person with a disability who is accompanied by a support person will be allowed to enter Crestview's premises with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

Crestview may require a person with a disability to be accompanied by a support person while on the Crestview premises in situations where it is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises.

6. Service Animals

Crestview is committed to welcoming persons with disabilities who are accompanied by a service animal when accessing our services on the parts of our premises that are open to the public and other third parties. It is the responsibility of the person using the service animal to ensure that the service animal is kept in control at all times. If a service animal is excluded from our premises by law, Crestview will make every effort to ensure that other measures are made available to enable the person with a disability to access Crestview's services.

7. Service Disruptions

Where there is a temporary disruption to services that are used by those with disabilities (e.g. elevator, door opener), Crestview will take reasonable steps to notify persons with disabilities who might be affected by the disruption. In particular, Crestview will identify the reason for the disruption, its anticipated length, and information about alternative services.

8. Availability of Document

All documents that detail Crestview's accessibility policies and procedures will be made available upon request. Crestview will make every effort to make the information available to persons with disabilities in a format that takes into account their disability.



9. Training

Crestview will ensure that all employees, volunteers and others who deal with the public or third parties on Crestview's behalf and all those who are involved in the development and approvals of accessibility policies, practices and procedures receive training on provincial accessibility laws and aspects of provincial human rights legislation that relate to persons with disabilities. Crestview trains its employees on accessibility as it relates to their specific roles. This training will be provided after commencing employment with Crestview or as soon as practicable and will include the following:

- an overview of the *Accessibility for Ontarians with Disabilities Act, 2005*, and the requirements of the *Integrated Accessibility Standards* ("IAS") Regulation;
- the *Human Rights Code* as it pertains to persons with disabilities;
- 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 a support person;
- how to use the assistive devices available on the premises that may assist with the provision of goods or services to persons with disabilities;
- what to do if a person with a disability is having difficulty in accessing Crestview's services; and
- Crestview's policies, practices and procedures relating to the *Customer Service Standards*.

Training will also take place on an ongoing basis when changes are made to Crestview's policies, practices and procedures.

We will maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom the training was provided.

10. Feedback Process

Crestview welcomes feedback on the ways in which it provides its customer service to persons with disabilities (including how it collects feedback). Individuals are encouraged to provide their feedback directly to the Chief Operating Officer, who will be responsible for investigating the matter and determining the actions to be taken. Feedback to the Chief Operating Officer may be provided by email at: Matthew.John@crestviewstrategy.com or by telephone at: 416-859-7067. The feedback process can be made available in accessible formats or with communication supports upon request and in consultation with the individual making the request.

In all cases, every effort will be made to respond to the feedback in a timely and effective manner.

11. Employment

Recruitment

Crestview notifies job applicants and the public that accommodation can be made during recruitment and hiring.

Crestview will notify staff that supports are available for those with disabilities. For example, if a qualified individual with a disability needs a reasonable accommodation to use or access the Company's online system, or during the interview and selection process, that individual should please contact Bableen.Johal@crestviewstrategy.com. Employees will be made aware of this information. When making offers of employment, the Company includes a notice of policies on accommodation for employees with disabilities.



Recruitment, Assessment or Selection Process

Crestview will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Crestview will 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.

Notice to Successful Applicants

When making offers of employment, Crestview will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

Crestview will inform employees of its policies (and any changes to those policies) used to support 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. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Crestview will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Crestview will consult with the employee making the request.

Employee Supports

Crestview's performance management and career development processes will take into account the accessibility needs of all employees as well as individual accommodation plans. Crestview will inform employees of its policies (and any changes to those policies) used to support 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. This information will be provided to new employees as soon as practicable after commencing employment.

Workplace Emergency Response Information

Crestview will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Crestview is aware of the need for accommodation due to the employee's disability. Crestview will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where an employee requires assistance, Crestview will, with the consent of the employee, provide workplace emergency response information to the person designated by Crestview to provide assistance to the employee.



Crestview will review the individualized workplace emergency response information when the employee moves to a different location in the Company, when the employee's overall accommodation needs are reviewed and when the Company reviews its general emergency response practices.

Individual Accommodation Plans

Crestview has a written process to develop individual accommodation plans for employees. This written process includes:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development 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 will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee; and
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

The individual accommodation plans will also include any information regarding accessible formats and communication supports provided (if requested), individualized workplace emergency response information (where required) and identify any other accommodation that is to be provided.

Return to Work

Crestview has a written process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work. This written process outlines the steps that Crestview will take to facilitate return to work of employees who were absent because their disability required them to be away from work and use documented individual accommodation plans as part of the process.

12. Information and Communications

Crestview will communicate with people with disabilities in ways that take into account their disability. When requested, Crestview will provide information about its organization and its services, in accessible formats or with communication supports.

13. Questions

If anyone has a question about this policy, please contact: Matthew John, Chief Operating Officer.