

SIRVA CANADA LP
ACCESSIBILITY POLICY

1. Commitment to Accessibility

SIRVA Canada LP (the “Company”) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario’s accessibility laws.

2. Application and Scope

This Policy is made pursuant to the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and the Integrated Accessibility Standards Regulation (“IAS Regulation”) of the AODA and addresses how the Company will achieve accessibility. This Policy will be reviewed and updated as necessary and will be posted on our website.

For purposes of this Policy, “disability” is defined as follows:

- (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*.

3. Self-Service Kiosks

The Company shall incorporate accessibility features when designing, procuring or acquiring self-service kiosks. “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.

4. Training

The Company provides training to all its employees, volunteers, persons who participate in developing its policies and all other persons who provide goods, services or facilities on behalf of the Company. The training shall be:

- (a) on the requirements of the IAS Regulation and the *Human Rights Code* as it relates to persons with disabilities;
- (b) appropriate to the duties of the employees, volunteers and other persons;
- (c) provided as soon as practicable, on an ongoing basis and as necessary to comply with all statutory requirements.

The Company shall keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it was provided.

5. Information and Communications Standards

Accessible Formats and Communication Supports

Upon request, and in accordance with the compliance schedule set out in the IAS Regulation, the Company will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is not greater than the cost charged to other persons, if any. The Company will consult with the person making the request to determine the suitability of an accessible format or communication support and notify the public about the availability of these formats and supports.

Feedback

In accordance with the requirements of the IAS Regulation, the Company ensures that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request. We will notify the public of the availability of accessible formats and communication supports including by posting this information online.

Further information about our feedback process is available at the end of this Policy.

Emergency Information

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

6. Employment Standards

The Company is committed to ensuring that its employment practices are in compliance with the AODA, IAS Regulation and the Ontario *Human Rights Code*.

Recruitment

Accommodations for applicants (including existing employees) with disabilities are available in the Company's recruitment processes.

The Company shall notify applicants when they are individually selected to participate in an assessment or selection process that accommodations, including Accessible Formats and Communication Supports, are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, the Company 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 a disability.

The Company shall notify successful applicants of the Company's policies for accommodating employees with disabilities when making offers of employment.

The Company shall also notify employees of its policies which 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 a disability.

Accessible Formats & Communication Supports for Employees

Where an employee with a disability requests it, the Company will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is (a) needed in order to perform the employee's job and (b) generally available to employees in the workplace.

Documented Individual Accommodation Plans & Return-to-Work Process

In accordance with the requirements set out in the IAS Regulation, the Company shall continue to develop a process for the development of individual accommodation plans for employees with disabilities. Our processes will include the following elements:

- (a) the manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- (b) the means by which the employee is assessed on an individual basis;
- (c) the manner in which the Company may request an evaluation by an outside medical or other expert to assist with determining if accommodation can be achieved and, if so, how to achieve accommodation;
- (d) the manner in which the employee can request the participation of a representative from the workplace in the accommodation process;
- (e) the steps taken to protect the privacy of the employee's personal information;
- (f) the frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- (g) if an individual accommodation plan is denied, the manner in which the reasons for the denial are to be provided to the employee; and
- (h) the means of providing the accommodation plan in a format that takes into account the employee's accessibility needs.

Individual accommodation plans shall, if requested, include: any information regarding accessible formats and communication supports provided; individualized workplace emergency response information; and identify any other accommodation that is to be provided.

The Company has in place documented return-to-work processes for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Building on that foundation, we will ensure that those processes clearly outline the steps that the Company will take to facilitate the return to work process amongst other requirements that facilitate that process. Our return to work processes will include individualized accommodation plans.

Performance Management, Career Development and Advancement, Redeployment

The Company shall take into account the accessibility needs and/or individual accommodation plans of employees when using performance management processes, providing career development and advancement, and using redeployment.

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 employer is aware of the need for accommodation. The Company provides this information as soon as practicable after becoming aware of the need for accommodation.

If an employee who receives individualized workplace emergency response information requires assistance and provided that the employee's consent is obtained, the Company will provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

The Company reviews the individualized workplace emergency response information in the following circumstances: when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed, and when it reviews its general emergency response policies.

7. Accessibility Standards for our Facilities

The Company is committed to designing our facilities free from barriers and accessible to all persons we serve. The Company will comply with the Design of Public Spaces Standards with respect to public spaces that are newly constructed or redeveloped in accordance with the requirements of the IAS Regulation.

8. References

- Accessible Customer Service Policy
- *Accessibility for Ontarians with Disabilities Act, 2005*
- Regulation 191/11 made under the *Accessibility for Ontarians with Disabilities Act, 2005* (Integrated Accessibility Standards)

9. Copies

Upon request, all of our policies can be made available in an accessible format and we can provide or arrange to provide communication supports as necessary.

10. Feedback and Questions

If you have any questions about this Policy or our accessibility initiatives, please let us know. Feedback on this Policy and the company's accessibility measures is welcome. Feedback can be provided through various means and in various forms. If you have questions, concerns or comments, please contact:

Email: hrsirva@sirva.com

All feedback received will be reviewed within a reasonable time period and the Company will take all appropriate steps to address any issues raised. All complaints will be processed in accordance with the Company' complaints process.