

Accessibility Plan for Ontarians with Disabilities Act (AODA) Policy and Multi-Year Accessibility Plan

Effective: November 11, 2016

Reviewed: October 13, 2023

Scope

This accessibility plan outlines the policies, procedure and actions that Lorama Group[®] Inc. has adopted to improve opportunities for people with disabilities in the following areas:

1. Customer service
2. Information and communication
3. Employment
4. Design of Public Spaces

The adopted multi-year Accessibility Plan is updated as goals are achieved and reviewed at least once every five years.

Statement of Commitment

In keeping with our core values Lorama Group[®] Inc. is committed to treating all people in a way that allows them to maintain their dignity and independence. The company believes in integration and equal opportunity and is committed to meeting the needs of people with disabilities and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*.

Lorama Group[®] Inc. understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the *Ontario Human Rights Code* or obligations to people with disabilities under any other law. Lorama Group Inc. is committed to complying with both the *Ontario Human Rights Code* and the AODA.

1. Customer Service Plan

Lorama Group[®] Inc. is committed to excellence in serving all customers including people with disabilities and makes our Accessibility Policy and all related documents available on request.

- We make every effort to make the information available to persons with disabilities in a format that accounts for their disabilities.
- We produce materials to accommodate individual needs in a timely manner and at no additional cost to the individual being accommodated.

Providing Services to Persons with Disabilities

Lorama Group® Inc. is committed to excellence in providing services to all clients of the company and their representatives, including persons with disabilities.

Communication

We will communicate with people with disabilities in ways that takes into account their disability.

Assistive Devices

Persons with disabilities may use their personal assistive devices when accessing our goods, services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with the disability can access our goods, services or facilities.

We will ensure that our staff are trained and familiar with various assistive devices that may be used by clients with disabilities while accessing our services.

Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public, unless the service animal is otherwise excluded from the area by law or where there are overriding health and safety considerations. When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

Support person

While on our premises, a person with a disability who is accompanied by a support person:

- will be allowed to have that support person accompany him or her.
- shall be permitted to have access to his or her support person at all times.
- may choose not to be accompanied by his or her support at all times (unless there are overriding health and safety concerns)

2. Information and Communication

Lorama Group® Inc. is committed to meeting the communication needs of people with disabilities. When requested, we will consult with people with disabilities to determine their information and communication needs.

Should Lorama Group® Inc. launch a new internet website or significantly refresh an existing internet website on or after January 1, 2021, Lorama Group® Inc. will ensure that the website and all content on that website conform to WCAG 2.0, Level AA, other than criteria 1.2.4 (live captions) and 1.2.5 (pre-recorded audio descriptions).

Training for Staff

All existing Lorama Group® Inc. employees received AODA training, and each new employee hired since July 2015 receives the training as part of orientation, ensuring training is delivered in a timely manner. We provide appropriate training according to work duties.

Training includes:

- The purpose of the AODA and the requirements of the customer service standard
- Lorama Group® Inc.'s policies related to the customer service standard.
- 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
- What to do if a person with a disability is having difficulty in accessing Lorama Group® Inc.'s goods services or facilities

Lorama Group® Inc. continues to refresh training regarding the *Ontario Human Rights Code* and the AODA's

Customer Standard, as well as including the AODA's IASR obligations. In particular:

Training records are maintained, including training dates and the number of individuals to whom it was provided in accordance with the requirements of the *Accessibility Standards for Customer Service (O. Reg. 429/07)*. Training is provided on any changes to the prescribed policies on an ongoing basis.

Notice of temporary disruption

Lorama Group® Inc. will notify clients promptly in the event of a planned or unexpected disruption to our services or facilities for clients with disabilities. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. The notice will be posted on our company's website, communicated internally via electronic mail, and, where appropriate, will be posted in the reception area of the relevant office location.

Accessible Emergency Information

Lorama Group® Inc. is committed to providing the customers and clients with publicly available emergency information in an accessible way upon request. We provide employees with disabilities with individualized emergency response information, when necessary, based on their known accommodation needs.

Feedback

Lorama Group® Inc. welcomes feedback on how we provide our services to people with disabilities. Clients or others who wish to provide feedback on the way Lorama Group® Inc. provides services to persons with disabilities can provide their feedback directly to the person from whom they received services. Alternatively, feedback may be provided by telephone, in writing, or email to the contact telephone numbers and addresses listed on our website. We arrange for accessible feedback and alternate formats upon request.

All feedback will be directed to the company's Director of Regulatory Affairs. In the ordinary course, clients can expect to hear back from the company within 10 business days of providing feedback to the company. Any complaints about services provided to persons with disabilities will be addressed according to our company's regular complaints management procedures.

Modifications to this or other policies

Any policy of Lorama Group® Inc. that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

Availability of Documents

Lorama Group® Inc. has prepared the documentation required under the *Accessibility Standards for Customer Service* and will provide copies upon request. This document will be provided in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and at no cost.

3. Employment

Lorama Group® Inc. is committed to fair and accessible employment practices. We have developed standard language included in all job postings, whether published publicly or internally, to notify the public and staff that, when requested, Lorama Group® Inc. will

accommodate people with disabilities during the recruitment and assessment processes and when people are hired or are permitted to apply for an internal transfer.

Lorama Group® Inc. will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- We will review all existing accommodation and return-to-work policies and practices.
- We will revise existing policies and practices to take into account all factors set out in the Integrated Accessibility Standards

When undertaking any performance management, career development and redeployment processes, Lorama Group® Inc. will ensure that the accessibility needs of its employees with disabilities needs are considered. This will include a review of any individual accommodation plans that are in place for individual employees.

Design of Public Spaces

Lorama Group® Inc. will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Due to the nature of our business, public spaces will typically include only service-related elements such as parking, a reception area, and waiting area.

Signed: _____

A handwritten signature in black ink, appearing to read "A. Burnett", is written over a horizontal line.

Andrew Burnett, CEO