

ACCESSIBILITY POLICY

Intent

Compass Communities (“**Compass**” or “**the Company**”) provides accessible employment in accordance with the Integrated Accessibility Standards Regulation (IASR) set forth under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its associated regulations. This policy outlines Compass’ commitment to standards for accessibility across employment, customer service, information and communications, and the design of public spaces. Regarding employment, this policy does not apply to volunteers or other individuals who are not paid.

Statement of Commitment

Compass is committed to providing an accessible and inclusive environment for all residents, guests, clients, employees, job applicants, suppliers, and other visitors who access our premises, information, or services. We are dedicated to ensuring that individuals with disabilities are provided equal opportunity to access our business in the same location and in a similar manner as others, in a way that respects their dignity, independence, integration, and equality of opportunity. We are doing so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

We are committed to incorporating accessibility principles into our policies, procedures, training, equipment requirements, and best practices. Our policies and practices are reviewed annually, as organizational changes occur, and in advance of legislative compliance deadlines to ensure ongoing adherence and continuous improvement.

Guidelines

Accessible Employment

Hiring

Accommodations are available from the beginning of the recruitment process. Information regarding the availability of accommodations is included in all job postings. Applicants selected to participate in the selection process are informed that accommodations are available upon request. Where accommodation are requested, the company consults with the applicant and provides or arranges for suitable accommodations that meet their

individual needs. Successful applicants are made aware of the company's policies for accommodating employees with disabilities when an offer of employment is made.

Accessible Workplace Information

Compass ensures that new employees are aware of the policies and support 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 support for employees with disabilities regarding information needed to perform their job, and other information that is generally available to all employees in the workplace. Individualized workplace emergency response information is also provided to an employee with a disability where necessary. An employee who requires workplace information in an accessible format or with communication support should contact the People & Culture team, who will consult with the employee to determine the best way to provide accessible format or communication support.

Individual Accommodations

Upon request, Compass creates and documents individual accommodation plans for employees with disabilities. An employee with a disability who requires an individual accommodation plan should inform the People & Culture team. These plans may 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 accommodation to return to work, the company will develop and document individual return-to-work processes.

Performance Management and Career Development

The accessibility needs of employees with disabilities are considered in all aspects of the employment relationship, including during performance management processes, career development or advancement opportunities, and in the event of redeployment. Individual accommodation plans are consulted where they exist, as part of this process.

Accessible Customer Service

Compass makes every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Allowing persons with disabilities to do things in their own ways and at their own pace when accessing goods, services, and facilities, as long as this does not present a health and safety risk.
- Using alternative methods of access when necessary to ensure that persons with disabilities have access to the same goods, services, and facilities in a similar manner; and
- Taking into account individual accommodation needs when providing services; and
- Communicating in a manner that considers the individual's disability.

Upon request, the company provides persons with a disability with a copy of this policy, or the information contained within it, in a format that meets their accessibility needs. Requests should be made to People & Culture.

Guide Dogs and Service Animals

Compass welcomes people with disabilities and their guide dog or other service animals. Guide dogs or service animals are allowed on parts of our premises that are open to the public and third parties. "No pet" policies do not apply to guide dogs or service animals. If an individual's service animal is excluded by law, Compass offers alternative methods to enable the person with a disability to access services and facilities.

If it is not readily apparent that an animal is a guide dog or service animal, our employees may ask for documentation to confirm, however they will not ask the nature of the person's disability or purpose of the animal. If the person reveals the animal is not a guide dog or service animal, we will explain why the animal should be removed from the premises promptly and discuss alternate methods of providing goods, services or facilities.

The individual who is accompanied by a guide dog or service animal is responsible for always maintaining control of the animal. If a service animal becomes out of control, causing clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, this should be reported to the People & Culture team who may ask them to remove their service animal from the premises.

Information pertaining to the use of guide dogs and service animals found in this policy is also provided in accessible formats that are available to all individuals of Compass.

Support Persons

If a person with a disability is accompanied by a support person, they will be allowed to have that person accompany them on our premises. In situations where confidential information might be discussed, consent must be obtained from the person with a disability before any potentially confidential information is mentioned in the presence of the support person.

The company may require a person with a disability to be accompanied by a support person while on the premise if the support person is required to protect the health and safety of the person with the disability or others in the workplace and there are no other reasonable measures that can be taken to ensure this. The company will consult the person with the disability and assess the available evidence before making a decision. Employees are informed of any such arrangements.

Notice of Temporary Disruptions

In the event of a planned or unexpected disruption to services or facilities for persons with disabilities, Compass will make reasonable effort to provide notice of any temporary disruptions.

When disruptions occur without notice, the company will:

- Post written notice in conspicuous places, including at the point of disruption and all entrances
- Verbally inform individuals upon arrival

The following information is provided regarding the disruption, unless it is not readily available or known:

- Services that are disrupted or unavailable;
- Reason for the disruption;
- Expected duration; and
- A description of alternative services or options that are available.

Employees are informed of this information as soon as reasonably possible in the event of disruption so that they can inform others and respond to inquiries.

Customer Feedback

Compass has established a process so the public can provide feedback on how our services and facilities are provided to customers with disabilities. Feedback may be shared verbally (in person or by telephone) or in writing (handwritten, delivered, website, or e-mail).

Compass addresses feedback case by case and will take appropriate action to remedy any issues. The company ensures the feedback process is accessible by providing or arranging for accessible formats and communication supports.

Please submit feedback to:

Compass Communities People & Culture Team

202-5520 Explorer Drive, Mississauga, ON L4W 5L1

Email: accessibility@compasscommunities.ca

Phone: 833-215-9516

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

Accessible Information and Communications

Compass strives to provide information and communications to all in a format or manner that meets their needs. The company provides or arranges for the provision of accessible formats and communication support for persons with disabilities upon request. This includes but is not limited to the feedback process and all publicly available safety and emergency information, such as evacuation procedures and floor plans.

Requests for accessible formats or communication support should be submitted to the People & Culture team. The company will consult with the individual making a request to ensure a suitable format or communication support is provided. Accessible formats and communication supports are provided in a timely manner and at a cost no more than the original format.

The company will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the company will provide the requestor with:

- An explanation as to why the information or communications are unconvertible; and
- A summary of the unconvertible information or communications.

Accessible Design of Public Spaces

Outdoor Public Play Spaces

When constructing new or redeveloping existing outdoor play spaces maintained by Compass, accessibility features for children and caregivers with various disabilities are incorporated into the design. Compass also ensures the ground is firm and stable, paying special attention to impact-attenuating properties for injury prevention. Sufficient clearance to allow persons with disabilities free movement throughout the outdoor play area is also provided.

Sidewalks and Pedestrian Walkways

All newly constructed or redeveloped non-recreational outdoor sidewalks and pedestrian walkways maintained by Compass meet all accessibility requirements outlined in the IASR.

Accessible Parking

Where Compass constructs or redevelops off-street parking facilities, accessible parking spaces will be provided in accordance with IASR. Accessible parking spaces will be identified with appropriate signage and designed to support persons with disabilities.

Obtaining Services

Where Compass constructs or redevelops service areas, accessibility will be considered in accordance with the Integrated Accessibility Standards Regulation (IASR). These spaces will be designed to support accessibility for individuals who use mobility aids or assistive devices.

Training

Compass Community provides accessibility training to all employees who operate and/or oversee employees in Ontario, senior leaders, and those who participate in the development of company policies. Training is provided on the accessibility standards found in the IASR and the Human Rights Code that are appropriate for the duties of the individual.

Accessibility training is provided as soon as practicable. All new hires receive accessibility training as part of their onboarding process. Retraining and/or revised training is provided in the event of changes to legislation, procedures, policies, or practices. Depending upon operational needs or specific circumstances, employees may be required to complete additional accessibility-related training.

The company keeps a record of all training that includes the dates of training provided and the number of employees who completed the training.

Definitions

Accessible formats: Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats useable 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: Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

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 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.

Guide dog: A dog trained as a guide for a blind person that has completed a training program at a designated training facility set out in the *Guide Dogs Regulation*.

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.

Administration

The policy will be interpreted and applied consistent with the Company's obligations under the applicable legislation. Subject to compliance with applicable legislation, the Company shall have full discretionary authority to interpret and administer this Policy. The Company reserves the right to modify, amend, suspend or terminate this Policy at any time, in its sole discretion, without advance notice.

In the event of any discrepancy between this policy and applicable provincial employment standards, the provisions of the provincial employment standards legislation shall prevail.