

Multi-year Accessibility Plan (AODA) – Ontario

Issued: Nov. 15, 2024

This accessibility plan outlines the strategy of TORLYS to prevent and remove barriers for people with disabilities and comply with the requirements of the Integrated Accessibility Standards regulation under the Accessibility for Ontarians with Disabilities Act, 2005.

TORLYS 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 regulation. 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.

Multi-year Accessibility Plan

This plan will be reviewed and updated at least once every five years. This plan is in effect from November 15, 2024 to November 15, 2029. The topics contained within this plan have been an ongoing process and are listed with the date of this plan being established: November 15, 2024.

TeamMates are provided with required training under the Accessibility for Ontarians with Disabilities Act, 2005 and its associated regulation as soon as practicable, after hiring, and when changes are made to the company's accessibility policies.

If you have any questions or concerns about this plan or its initiatives, or if you want to receive a copy of the plan in a different accessible format, please contact **Accessible@torlys.com**.

Completed Initiatives

TORLYS has completed the following initiatives to prevent and remove barriers and comply with the requirements of the Integrated Accessibility Standards regulation under the Accessibility for Ontarians with Disabilities Act, 2005:

General

- TORLYS policy and Multi-year accessibility plan regarding the IASR are available on our accessibility webpage – 11/15/2024.

Training

- TORLYS ensures that training is provided on the requirements of the accessibility standards referred to in IASR Regulation and on the Human Rights Code as it pertains to persons with disabilities to all employees and volunteers; and all persons who participate in developing the organization's policies; and all other persons who provide goods, services or facilities on behalf of the organization. The Training on the requirements of the accessibility standards on the Human Rights Code referred to above is appropriate to the duties of the employees, volunteers, and other persons; and
- Every person referred to above shall be trained as soon as practicable. TORLYS will provide training in respect of any changes to the policies described above on an ongoing basis; and
- TORLYS keeps a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided – 11/15/2024.

Information and Communication Standards

- TORLYS has developed a process for receiving and responding to accessibility feedback and has ensured that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request; and
- TORLYS has notified the public about the availability of accessible formats and communication supports – 11/15/2024.

Employment Standards

- TORLYS informs its employees of its policies used to support its 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; and
- TORLYS provides this information required under this section to new employees as soon as practicable after they begin employment; and
- TORLYS will provide updated information to its employees as soon as practicable whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability – 11/15/2024.

New and Ongoing Initiatives

TORLYS plans to take or is in the process of completing the following initiatives to prevent and remove barriers and comply with the *Integrated Accessibility Standards* regulation under the *Accessibility for Ontarians with Disabilities Act, 2005*:

General

- TORLYS will have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-serve kiosks; and
- Whenever applicable, if there is a temporary disruption of goods, services or facilities used by persons with disabilities, TORLYS will provide notice to the public as necessary – 11/15/2024.

Information and Communication Standards

- On an ongoing basis, and upon request, TORLYS will provide or arrange accessible formats and communication supports for persons with disabilities in a timely manner and by consulting with and taking into account the person's accessibility needs due to a disability; and at a cost that is no more than the regular cost charged to other persons; and
- TORLYS will consult with the person making the request in determining the suitability of an accessible format or communication support; and
- Where an employee with a disability so requests it, TORLYS will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for a) information that is needed in order to perform the employee's job; and b) information that is generally available to employees in the workplace. TORLYS will consult with the employee making the request in determining the suitability of an accessible format or communication support; and
- TORLYS shall notify the public about the availability of accessible formats and communication supports; and
- If TORLYS prepares emergency procedures, plans or public safety information and makes the information available to the public, TORLYS shall provide the information in an accessible format, or with appropriate communication supports, as soon as practicable, upon request, (this requirement is not applicable to TORLYS at this time) – 11/15/2024.

Website & Web Content

- TORLYS continues to take steps in developing a new accessible website and web content which will be available in accordance with WCAG 2.0 Level AA guidelines as of August 1, 2025.

Employment Standards

Recruitment

- On an ongoing basis, TORLYS notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process; and
- During a recruitment process, TORLYS will notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes being used. If a selected applicant requests an accommodation, TORLYS will consult with the applicant to 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; and

- When making offers of employment, TORLYS will notify the successful applicant of its policies for accommodating employees with disabilities – 11/15/2024.

Emergency Procedures

- Whenever applicable, TORLYS will continue to take steps to develop and provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and TORLYS is aware of the need for accommodation due to the employee's disability; and
- Whenever applicable, if an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, TORLYS shall provide the workplace emergency response information to the person designated by TORLYS to provide assistance to the employee; and
- Whenever applicable, TORLYS will provide the information required above as soon as practicable after TORLYS becomes aware of the need for accommodation due to the employee's disability; and
- Whenever applicable, TORLYS shall review the individualized workplace emergency response information, a) when the employee moves to a different location in the organization; b) when the employee's overall accommodation needs or plans are reviewed; and c) when TORLYS reviews its general emergency response policies – 11/15/2024.

Individual Accommodation Plans

- Whenever applicable, TORLYS will continue to take steps to develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities; and
- The process for the development of documented individual accommodation plans shall include the following elements:
 - 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 TORLYS 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,
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability; and
- Individual accommodation plans shall, a) if requested, include any information regarding accessible formats and communication supports provided, and b) if required, include individualized workplace emergency response information, and c) identify any other accommodation that is to be provided – 11/15/2024.

Return to Work Process

- Whenever applicable, TORLYS will continue to take steps to develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and
- The return to work process shall, a) outline the steps TORLYS will take to facilitate the return to work of employees who were absent because of their disability required them to be away from work; and b) use documented individual accommodation plans as part of the process; and
- The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute – 11/15/2024.

Performance Management, Career Development & Redeployment

- Whenever applicable, TORLYS will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans with respect to performance management, or any performance management process in respect of employees with disabilities; and
- Whenever applicable, TORLYS will take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans with respect to career development and advancement of our employees with disabilities; and
- Whenever applicable, TORLYS will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, with respect to redeploying employees with disabilities – 11/15/2024.