



ONTARIO ACCESSIBILITY POLICY AND MULTI-YEAR ACCESSIBILITY PLAN

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1. Purpose / Applicability

Under the *Accessibility for Ontarians with Disabilities Act, 2005*, all public and private sector organizations in the Province of Ontario must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility policy, multi-year accessibility plan and related commitments, in accordance with the *Integrated Accessibility Standards* (Ontario Regulation 191/11) for Ontario operations of NLS. The *Accessibility for Ontarians with Disabilities Act, 2005*, and its Regulations (including all other standards as may be developed) are collectively referred to hereafter as the AODA.

This Policy applies to all NLS Representatives in the Province of Ontario.

2. NLS' General Accessibility Policy

NLS is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA.

2.1 Commitment to Accessible Information and Communications

(i) Accessible Formats and Communication Supports

Upon request, will provide the following in an accessible format or via accessible communication support:

- (a) all organizational information and communications made available to NLS' customers and the public, including this policy;
- (b) any publicly available emergency procedures, plans or public safety information to its customers and the public; and
- (c) access to any processes for receiving and responding to feedback.

NLS will consult with the person making the request to determine the suitability of any accessible format or communication support provided. This information and documentation will be provided as soon as is practicable, but specific timeframes may vary depending on the format requested.

(ii) Website Accessibility

Any new internet websites and any new web content and web-based applications will conform to the Web Content Accessibility Guidelines (WCAG) Level AA (other than success criteria 1.2.4 and 1.2.5), except where doing so is not practicable.

(iii) **Feedback Regarding Accessibility**

NLS encourages persons with disabilities to provide comments on the goods, services and facilities they receive or use, including feedback regarding the accessibility of those goods, services or facilities.

Feedback may be delivered to NLS in person, by telephone, mail, email, facsimile or other means available to the person.

Customers may use any of the following feedback channels:

- In person at NLS' office:
150 CourtneyPark Drive West, Mississauga. Ontario L5W 1Y6
- By telephone, facsimile or e-mail:
Telephone: 905-364-0032, e-mail: info@nls.ca
- By mail: in writing or through electronic or audio recording.

All feedback will be reviewed for possible improvement. Feedback will be directed to the most appropriate department for resolution, and any complaints will be addressed as soon as possible. Persons providing feedback can expect an acknowledgment of their feedback to be issued within ten (10) business days. The acknowledgment will indicate when the matter will be addressed, and when the individual will be notified further in the matter. Correspondence with the individual will take into account their accessibility needs and will be provided in accordance with NLS' commitment to accessible information and communication supports, described above.

2.2 Accessible Employment

NLS has implemented the following practices and procedures to promote the inclusion of applicants for employment and existing employees with disabilities in its workplace.

(i) **Recruitment**

NLS is Canada's leading retail logistics provider for global lifestyle brands, including apparel, footwear, accessories, and sporting goods. NLS welcomes diversity in the workplace and encourages applications from all qualified individuals, including visible minorities, Aboriginal People, and persons with disabilities. NLS is committed to providing accommodation for people with disabilities. To request any accommodation you may require to participate in the recruitment process (including alternative formats of materials or accessible meeting rooms) contact Human Resources to discuss your needs.

(ii) Employee Notification

NLS informs its employees of its policies used to support its employees with disabilities: (a) to new employees as soon as practicable after they begin their employment; and (b) whenever there is a change to existing policies on the provision of job accommodations that take into account accessibility needs due to a disability.

(iii) Accessible Formats and Communication Supports

Where an employee with a disability requests it, NLS 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) employment information that is generally available to employees in the workplace.

NLS will consult with the employee making the request in determining the suitability of an accessible format or communication support.

(iv) Individual Accommodation Plans

NLS has a written process for the development of a documented Individual Accommodation Plan. A copy of this process can be found in the Accessible Employment Policy, which is posted on NLS' intranet and on the facility communication board.

(v) Return to Work Process

NLS has a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. A copy of this process can be found in the Accessible Employment Policy, which is posted on NLS' intranet and on the facility communication board.

(vi) Performance Management, Career Development and Advancement and Redeployment

NLS takes into account the accommodation needs of its employees, including any individual accommodation plans of employees, when: (a) using performance management; (b) providing career development and advancement opportunities; and (c) redeploying employees.

(vii) Workplace Emergency Response Information

NLS 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 due to the employee's disability. More details regarding this process can be found in the Accessible Employment Policy, which is posted on NLS' intranet and on the facility communication board.

Training Commitment

NLS provides three types of training related to accessibility: accessible customer service training (as further discussed in section 3.6 below); integrated standards accessibility training; and training on the *Human Rights Code* as it relates to individuals with disabilities.

This training will be provided to all Representatives as soon as practicable and generally, within three months of the individual's commencement of duties. Training will also be provided on an ongoing basis when changes are made to these policies, practices and procedures.

NLS will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

3. Accessible Customer Service

NLS has developed a policy governing its commitment to providing accessible customer service. A copy of this policy can be found on NLS' corporate website.

NLS is committed to providing access to goods and services to its customers in a manner that is consistent with the principles of independence, dignity, integration and equality of opportunity, and that is in compliance with the AODA. To that end, NLS recognizes the importance of:

- Providing integrated access to goods and services for individuals with disabilities;
- Openly communicating and responding to the needs of customers with disabilities in order to provide them with excellent customer service; and
- Complying with the mandatory Customer Service Standard addressed under the AODA.

3.1 Accessible Customer Communications

NLS Representatives are required to communicate with customers with disabilities in a manner that takes into account their disabilities. Representatives will consider how a customer's disability may affect the way that the customer expresses, receives or processes communications and, where possible, they will ask the customer how to best communicate with them.

3.2 Assistive Devices

Assistive devices that may be used by individuals with disabilities are welcome on NLS' premises that are open to the public or other third parties. NLS will take steps to ensure that Representatives are familiar with commonly used assistive devices.

3.3 Service Animals

NLS welcomes guide dogs or other animals that serve individuals with disabilities in those areas of its premises that are open to customers and will permit the customer to keep the service animal with them, except for those animals that are otherwise excluded by law from the premises. In the event that a service animal is otherwise excluded by law from the premises, NLS will provide the applicable customer with an alternative method of obtaining, using or benefitting from its goods or services.

3.4 Support Persons

NLS welcomes persons who support individuals with disabilities to NLS them onto those parts of its premises that are open to the public or other third parties. NLS will ensure that customers who so require have access to their support persons while on the premises. Such support persons need not be paid, professional support workers. They may be volunteers, family members or friends who provide support to the customer.

3.5 Temporary Unavailability of Access to Goods or Services for Customers with Disabilities

In the event that a facility, service or system offered by NLS to customers with disabilities becomes temporarily unavailable, in whole or in part, NLS will provide notice of the disruption, as is reasonable in the circumstances. The notices will be posted in a conspicuous location at NLS or in another reasonable location, in the circumstances and shall:

- Explain the reason for and anticipated length of the disruption; and
- Provide a description of and indicate the location of an alternative facility or service that is accessible to individuals with disabilities, if available.

3.6 Accessible Customer Service Training

All NLS Representatives will be:

- Provided with an overview of the AODA and the Customer Service Standard under the Regulations;
- Trained on how to interact, communicate and assist people with disabilities, and in particular, people with assistive devices, and those who require the assistance of a guide dog, service animal or support person;
- Made aware of the policies and procedures created by NLS in accordance with the Customer Service Standard; and
- Trained on how to help a person with a disability who is having difficulty accessing NLS' goods or services.

This training will also be provided on an ongoing basis, as soon as practicable, whenever NLS’ policies change with respect to customer service accessibility for individuals with disabilities.

4. Multi-Year Accessibility Plan

Under the AODA, private and not-for-profit organizations with 50 or more employees in Ontario must create a multi-year accessibility plan. This Multi-Year Accessibility Plan outlines the policies and actions that NLS will or has put in place to improve opportunities for people with disabilities across the organization.

This multi-year accessibility plan will be updated at least once every five years.

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
General Requirements		
Establish accessibility policies governing how NLS will meet its obligations under the AODA	3.(1)	Complete - see further section 2 of this policy.
Establish, implement and maintain a documented multi-year accessibility plan; post the plan on the website; review and update the plan at least once every five years	4.(1)	Complete - see further section 4 of this policy
Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks	6.(2)	Not currently applicable
Training on the requirements of the accessibility standards and on the Human Rights Code as it relates to persons with disabilities	7.(1)	Complete - see further section 2.2 of this policy
Customer Service Standards		
Develop, implement and maintain policies governing the provision of NLS’ services to persons with disabilities, and provide in an accessible format upon request	80.46 (1)	Complete - see further sections 2.1(i) and 3.1 of this policy

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
Training on accessible customer service	80.49 (1)	Complete - see further sections 2.2 and 3.6 of this policy
Information and Communications Standards		
Ensure that feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request	11.(1)	Complete - see further section 0 of this policy
Upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, in consultation with the individual, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons. Notify the public of the availability of these supports	12.(1), (2) and (3)	Complete - see further section 2.1(i) of this policy
Provide any publicly available emergency response information in an accessible format, upon request	13. (1)	Complete - see further section 2.1(i) of this policy
Ensure new internet websites and web content on those sites conform with WCAG 2.0 Level	14. (4)1	In progress- see further section 2.1(ii) of this policy
By January 1, 2021, ensure all internet websites and web content conform with WCAG 2.0 Level AA, other than, i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded)	14. (4)2	In progress - see further section 2.1(ii) of this policy
Employment Standards		

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
Notify NLS employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes	22	Complete - see further section 2.2(i) of this policy
During a recruitment process, 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 to be used.	23	Complete - see further section 2.2(i) of this policy
Notify successful job applicant of NLS' policies for accommodating employees with disabilities	24	Complete - see further section 2.2(i) of this policy
Inform employees of NLS' policies used to support employees with disabilities	25	Complete - see further section 0 of this policy
Consult with a requesting employee in a manner that considers his or her disability 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	26.1 and 26.2	Complete - see further section 2.2(iii) of this policy
Provide 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 due to the employee's disability	27	Complete - see further section 2.2(vii) of this policy

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
Develop and implement a written process for documenting individual accommodation plans for employees with disabilities	28	Complete - see further section 2.2(iv) of this policy
Develop and implement a return to work process employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work	29	Complete - see further section 2.2(v) of this policy
Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities	30	Complete - see further section 2.2(vi) of this policy
Take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities	31	Complete - see further section 2.2(vi) of this policy
Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities	32	Complete - see further section 2.2(vi) of this policy
Design of Public Spaces		
Ensure that any new or redeveloped outdoor Paths of Travel (i.e. sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals) comply with the requirements of the AODA	80.22	Not currently applicable

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
Ensure that any new or redeveloped parking (on and off street) complies with the requirements of the AODA	80.32	Not currently applicable
Ensure that any newly constructed service counters and fixed queuing lines, and any newly constructed or redeveloped waiting areas, comply with the requirements of the AODA	80.40	Not currently applicable
Develop procedures for preventative and emergency maintenance of the accessible elements in the above-noted public spaces and procedures for dealing with temporary disruptions when the above-noted accessible elements are not in working order	80.44	Not currently applicable

5. Availability of this Policy

A copy of this policy will be posted on NLS' corporate website and NLS intranet.

Upon request, NLS will provide or arrange for the provision of this policy, or the information contained in this policy, to the requesting individual in an accessible format or with a communication support in a timely manner that takes into account the person's accessibility needs due to disability and at no cost. In doing so, NLS will consult with the person making the request in determining the suitability of the format or communication support.

Appendix A – Definitions

“Accessible Formats” means any form of large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities in order to conduct business with NLS.

“Communication Supports” means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications in order to conduct business with NLS.

“Disability” as defined in the Ontario *Human Rights Code* means:

- (a) any degree of physical 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 impairment, 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*.

“Representative” means employees, volunteers, others that provide goods or services on NLS’ behalf, and all those who are involved in the development of NLS’ policies, practices and procedures.

“Web Content Accessibility Guidelines” means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”.

“Website” means a collection of related webpages, images, videos, or other digital assets that are addressed relative to a common Uniform Resources Identifier (URI) and is accessible to the public.