



Walsh Canada Accessibility Policy

This Accessibility Policy (“Policy”) outlines the standards and actions that Walsh Canada (“the Company”) has in place to improve opportunities for people with disabilities and to meet our obligations under the Accessibility for Ontarians with Disabilities Act (“AODA”), 2005, regulations, standards, and all applicable laws. The Policy can be provided in an accessible format upon request.

I. Statement of Commitment

The Company is committed to ensuring equal opportunity, equal access, and equal participation for people with disabilities. We are committed to making every reasonable effort to ensure that people with disabilities are treated with dignity and respect, and to ensuring that people with disabilities benefit from employment, training, redeployment, and career development and advancement opportunities while taking into account their accessibility needs.

II. Scope and Purpose

This Policy applies to all employees of the Company in the province of Ontario. Walsh Canada is committed to ensuring that its guidelines, policies, practices and procedures promote a barrier-free environment for all customers and employees as laid out under applicable laws, including the AODA, its regulations, standards.

III. Training

The Company is committed to ensuring that employees receive training on the requirements applicable to accessibility standards, procedures and practices in Ontario. Records of such training, including the dates on which training is provided and the names and positions of the individuals who attended the training will be maintained in accordance with the requirements of the AODA.

IV. Information and Communications

Upon request, the Company will provide or arrange for the provision of suitable accessible formats and communication supports for persons with disabilities. The Company will take into account the person’s accessibility needs and will consult with the person making the request in determining the suitability of an accessible format or communication support. The Company will also notify the public about the availability of accessible formats and communication supports for persons with disabilities.

V. Emergency Information and Notice of Temporary Disruption

The Company will provide notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available, and will be placed at a conspicuous location on the premises.



The Company will 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 Company is aware of the need for accommodation due to the employee's disability.

VI. Employment/Recruitment

The Company is committed to providing fair and accessible employment practices to persons with disabilities. The Company will notify employees and applicants about the availability of accommodations for applicants and employees with disabilities during the recruitment and assessment processes, and during the career development, advancement, and redeployment processes.

VII. Documented Individual Accommodation Plans & Return-to-Work Process

In accordance with the AODA, the Company provides individual accommodation plans and return to work processes for employees who have been absent due to a disability. Employees are encouraged to contact Human Resources Department for detailed information.

VIII. Feedback Process

Individuals who wish to provide feedback on the way the Company provides services to people with disabilities may e-mail, write or the office at the telephone number(s) below. All feedback will be directed to the Human Resources Department, and complaints will be addressed according to the Company's regular complaint management procedures.

IX. Further Information

If you have a question or concern about the Walsh Canada Accessibility Policy, or if you require an accessible format or communication support, please contact the Corporate Human Resources Director at email hr@walshgroup.com, or call +1 (312) 563-5905.

Copies of this policy and related documents are available upon request.

Walsh Canada Integrated Accessibility Standards - Multi-Year Accessibility Plan

In accordance with Walsh Canada’s obligations under the Accessibility for Ontarians with Disabilities Act (AODA), Integrated Accessibility Standards Regulation (IASR), Walsh Canada has prepared this multi-year plan outlining the initiatives and actions that Walsh Canada will implement to remove barriers to accessibility and meet the accessibility requirements under the AODA.

Compliance Date	Initiative	Description	Action	Status
January 1, 2014	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation. O. Reg. 191/11, s. 3 (1).	Develop policy	Complete
January 1, 2014	Develop Multi-Year Accessibility Plan	4.(1) Large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years. O. Reg. 191/11, s. 4 (1).	Post to website Establish a review cycle	Complete

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January 1, 2014	Accessible websites and web content	14.(2) Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section. O. Reg. 191/11, s. 14 (2).	Develop web site as per requirements.	<p>In Progress</p> <p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than: (1) Success criteria 1.2.4 Captions (Live); and (2) Success criteria 1.2.5 Audio Descriptions (pre-recorded)</p>
January 1, 2015	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, a) all employees, and volunteers; b) all persons who participate in developing the organization's policies; and c) all other persons who provide goods, services or facilities on behalf of the organization.	Develop training plan	Complete

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January 1, 2015	Feedback	11. (1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. O. Reg. 191/11, s. 11 (1).	Develop process for receiving and responding to feedback. Ensure employees are aware of this requirement.	Complete
January 1, 2016	Accessible formats & communication supports.	12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (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. O. Reg. 191/11, s. 12 (1). (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 12 (2). (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. O. Reg. 191/11, s. 12 (3).	Develop process for providing or arranging for accessible formats.	Complete
January 1, 2016	Recruitment – general	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. O. Reg. 191/11, s. 22.	Develop process	Complete

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January 1, 2016	Recruitment, assessment or selection process	<p>23. (1) During a recruitment process, an employer shall 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. O. Reg. 191/11, s. 23 (1).</p> <p>(2) If a selected applicant requests an accommodation, the employer shall 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 disability. O. Reg. 191/11, s. 23 (2).</p>	Develop process	Complete
January 1, 2016	Notice to successful applicants	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. O. Reg. 191/11, s. 24.</p>	Develop process	Complete
January 1, 2016	Informing employees of supports	<p>25.(1) Every employer shall inform 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. O. Reg. 191/11, s. 25 (1).</p> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. O. Reg. 191/11, s. 25 (2).</p> <p>(3) Employers shall provide updated information to its employees 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. O. Reg. 191/11, s. 25 (3).</p>	Develop process	Complete

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<p>January 1, 2016</p>	<p>Accessible formats and communication supports for employees</p>	<p>26.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <ul style="list-style-type: none"> (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. O. Reg. 191/11, s. 26 (1). <p>(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 26 (2).</p>	<p>Develop process</p>	<p>Complete</p>
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<p>January 1, 2016</p>	<p>Workplace emergency response information</p>	<p>27.(1) Every employer shall 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. O. Reg. 191/11, s. 27 (1).</p> <p>(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. O. Reg. 191/11, s. 27 (2).</p> <p>(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee’s disability. O. Reg. 191/11, s. 27 (3).</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> (a) when the employee moves to a different location in the organization; (b) when the employee’s overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. O. Reg. 191/11, s. 27 (4). 	<p>Develop process</p>	<p>Complete</p>
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<p>January 1, 2016</p>	<p>Documented individual accommodation plans</p>	<p>28(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. O. Reg. 191/11, s. 28 (1).</p> <p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer 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. 4. 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. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 	<p>Develop process</p>	<p>Complete</p>
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		<p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. O. Reg. 191/11, s. 28 (2).</p>		
January 1, 2016	Return to work process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall 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</p> <p>(b) shall document the process. O. Reg. 191/11, s. 29 (1).</p> <p>(2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use documented individual accommodation plans, as described in section 28, as part of the process. O. Reg. 191/11, s. 29 (2).</p>	Develop process	Complete

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January 1, 2016	Performance management	30.(1) An employer that uses performance management in respect of its employees shall 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. O. Reg. 191/11, s. 30 (1).	Develop process	Complete
January 1, 2016	Career development and advancement	31.(1) An employer that provides career development and advancement to its employees shall 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. O. Reg. 191/11, s. 31 (1).	Develop process	Complete
January 1, 2016	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. O. Reg. 191/11, s. 32 (1).	Develop process	Complete