

WINCON SECURITY

MULTI-YEAR ACCESSIBILITY PLAN

Wincon Security (“Wincon” or the “Company”) is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11* (“AODA”). The *Integrated Accessibility Standards, Regulation 191/11* (“IASR”) under the AODA establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and the design of public spaces.

This 2020-2025 Multi-Year Accessibility Plan outlines the strategy of Wincon to prevent and remove barriers in order to meet the current and future requirements of the AODA, and to fulfill the Company's commitment as outlined in the Wincon Security Accessibility Policies.

In accordance with the requirements set out in the IASR, Wincon will:

- Establish, review and update this Plan in consultation with persons with disabilities;
- Post the Plan on the website, www.wincon-security.com;
- Provide the Plan in an accessible format, upon request; and
- Review and update the Plan at least once every five (5) years.

DEFINITIONS

Assistive Devices – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Communication Supports – Supports that facilitate effective communications, including captioning, alternative and augmentative communication supports, plain language and sign language.

Disability – The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- Any degree of physical disability, 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 impediment, 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Persons with Disabilities – Individuals who have a disability as defined under the Ontario *Human Rights Code* (as above).

Guide Dog – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – an animal is a service animal for a person with a disability if:

1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario;
 - A member of the College of Occupational Therapists of Ontario;
 - A member of the College of Optometrists of Ontario;
 - A member of the College of Physicians and Surgeons of Ontario;
 - A member of the College of Physiotherapists of Ontario;
 - A member of the College of Psychologists of Ontario; or
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Service Dog – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

CUSTOMER SERVICE STANDARDS

Commitment:

Wincon is committed to excellence in serving all customers, including persons with disabilities, and will provide goods, services and facilities in a way that is accessible and respects the dignity and independence of persons with disabilities.

Action Taken:

- All persons who, on behalf of Wincon, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as others providing services to customers, are trained on an on-going basis to communicate with persons with disabilities. Training includes the following:
 - Review of the purpose of the AODA and the requirements of 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;
 - How to use the alternative means to help provide goods or services to people with disabilities;
 - What to do if a person with a disability is having difficulty in accessing the Company's goods and services; and
 - The Company's policies, practices and procedures relating to the Customer Service Standard.
- All staff, volunteers and others dealing with the public are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing Company services.
- Training for new employees occurs as part of the orientation process offered by Human Resources.
- Wincon provides fully accessible telephone service to customers and other forms of communication with customers, if telephone communication is not suitable to their needs.
- The Company ensures accommodation to customers serviced by a guide dog or other service animal in public areas of its premises.
- Where a person with a disability is accompanied by a support person, the support person is also accommodated in public areas of Company premises.

- Customers are notified in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities by placing standard notices of temporary disruption on the Company website and the 24-hour customer service line.
- Feedback is encouraged from persons with disabilities through multiple accessible ways, including in person, by video Conferencing, telephone, by mail or by e-mail.
- Wincon communicates its Accessible Customer Service Standard policy through hyperlink on the company's website, internal notice boards, or Human Resources provides the policy upon request

Status: All completed, links to be updated on new website in progress by August 2021

EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

Commitment:

Wincon is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

Action Taken:

- Any emergency procedures, plans and public safety information relating to Wincon's premises that are prepared by the Company and made available to the public, are available in accessible formats or with communication supports upon request.

Status: Complete

WORKPLACE EMERGENCY RESPONSE INFORMATION

Commitment:

Wincon is committed to providing individualized workplace emergency response information to an employee with a disability requiring assistance during an emergency.

Action Taken:

- Individualized workplace emergency response information procedures have been developed for employees with disabilities.
- Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and require assistance during an emergency.
- Wincon, with consent, provides assistance to specific disabled employees in accordance with the information contained in the Workplace Emergency Response Information forms to help them evacuate the workplace during an emergency.
- Workplace Emergency Response Information forms have only been communicated to the employees' managers and other affected persons on an as-needed basis.
- Human Resources reviews and assesses general workplace emergency response procedures and individualized emergency plans on an on-going basis.
- Human Resources ensures that the individual workplace response information are updated as necessary.

Status: Complete

TRAINING

Commitment:

Wincon is committed to training employees, volunteers, all persons who deal with the public or other third parties on their behalf and other persons involved in developing policies on Ontario's accessibility laws and accessibility aspects of the Ontario *Human Rights Code* ("Code") that apply to persons with disabilities.

Planned Action effective January 1, 2015:

- Appropriate training on the requirements of the IASR and on the Code as it pertains to persons with disabilities will be provided to employees, volunteers, third-party contractors who provide goods, services and facilities on Wincon's behalf and persons participating in the development and approval of Company policies.
- Training will be completed as soon as practicable for current employees, and will be part of the orientation process for new employees.
- Records of training dates and number of participating individuals will be kept with Human Resources.
- Human Resources will ensure on-going training where there are any changes to legislation or practices.

Status: Training is Ongoing with new recruits

INFORMATION AND COMMUNICATION STANDARDS

Commitment:

Wincon is committed to making information and communications accessible to persons with disabilities. The Company will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible to meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

Planned Action effective January 1, 2015:

- Upon request, all major Company publications, including advertising, promotional materials, Employee Handbook and Occurrence Reports will be provided in accessible formats and/or with communication supports for customers and employees.
- The accessible format and/or communication support will be provided or arranged in a timely manner that accounts for the person's needs due to disability and at a cost no more than the regular cost charged to other persons.
- Human Resources will consult with the person making a request to determine the suitability of the accessible format or communication support.
- The public will be notified through the Company website about the availability of accessible formats and communication supports.
- Wincon will ensure processes for receiving and responding to feedback from customers and employees are accessible to persons with disabilities by arranging for accessible formats or communication supports, if necessary.
- If Wincon determines that the information or communication cannot be made accessible, the Company will provide an explanation as to why the information or communication are unconvertible and a summary of the unconvertible information.

Status: Ongoing

2. Accessible Websites and Web Content

Action Plan effective January 1, 2014:

- As Wincon develops new internet websites, the Company will ensure that the websites and web content conform with the World Wide Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.

Planned Action effective January 1, 2021:

- Internet websites and web content will conform with the World Wide Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.

Status: In progress, working with web developers in 2021

EMPLOYMENT STANDARDS

Commitment:

Wincon is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective employees with disabilities.

1. Recruitment, Assessment and Selection

Planned Action effective January 1, 2016:

- The Company will undertake a review and, as necessary, modify existing recruitment policies and procedures to ensure fair and accessible recruitment processes.
- Wincon will notify its employees, as well as the public about the availability of accommodation for job applicants with disabilities during the recruitment process. Notification will be provided in an accessible manner, if necessary.
- The availability of accommodation during the recruitment process will be indicated in job postings.
- Job applicants who are individually selected to participate in an assessment or selection process will be notified of available accommodation upon request. The availability of accommodation will be communicated primarily through e-mail, or in an alternative manner if necessary.
- If a selected applicant requests accommodation, Human Resources will consult with the applicant and arrange for suitable accommodation in a manner that takes into account accessibility needs.
- All successful applicants will be primarily notified via e-mail of the workplace policies for accommodation employees with disabilities, and notification will be provided in an accessible manner, if necessary.

Status: In progress, upgrades being undertaken

2. Informing Employees of Supports

Planned Action effective January 1, 2016:

- Wincon will inform all current and new employees of workplace policies that support employees with disabilities, including accommodation policies that take into account needs due to disability.
- New employees will be informed of workplace policies that support employees with disabilities as soon as practicable via e-mail, Dayforce HCM broadcasts and Employee Handbook.
- Wincon will inform employees of any changes to existing workplace policies with respect to accommodating disability via e-mail.
- Suitable accessible formats and communication supports for information needed to perform the employee's job and general employee information will be provided and arranged by the Company. In order to provide suitable accessible formats or communication supports, Human Resources will consult the requesting employee.

Status: In progress

3. Documented Individual Accommodation Plans and Return to Work Processes

Planned Action effective January 1, 2016:

- Wincon's existing practice is to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.
- Human Resources will develop written individual accommodation plans for employees with disabilities, if necessary.
- The process for developing each individual accommodation plan for an employee with a disability requiring accommodation will be in accordance with the IASR.
- Current policies and practices on accommodation will be reviewed and modified to integrate the process for developing written individual accommodation plans for employees with a disability, if necessary.
- If applicable, individual accommodation plans will include information regarding accessible formats and communication supports, individualized workplace emergency response information and any other accommodation.
- Human Resources will ensure that individual accommodation plans are updated as necessary.
- Human Resources will develop a written Return to Work process for employees absent due to disability and requiring accommodation.
- The written Return to Work process will outline the steps Wincon will take to facilitate the return to work after a disability-related absence, and to develop and use written individual accommodation plans.
- Current policies and practices on returning to work will be reviewed and modified to integrate the written Return to Work process.

Status: Completed

4. Performance Management, Career Development and Redeployment

Planned Action effective January 1, 2015:

- Wincon will review, assess and modify, if necessary, existing policies, procedures and practices on performance management, career development and redeployment to ensure compliance with the IASR.
- The Company will consider the accessibility needs of employees with disabilities, and as applicable, their individualized accommodation plans, when assessing performance, management, career development and advancement, and redeployment.
- Managers who conduct performance management and career development and advancement meetings, and make redeployment decisions will be trained on accounting for accessibility needs.

Status: In progress

ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT

Commitment:

Wincon is committed to removing barriers in public spaces and buildings to uphold the dignity and independence of persons with disabilities.

Planned Action effective January 1, 2017:

Wincon Security understands the importance of an accessibly built environment that allows for independence and participation for persons with disabilities. Public spaces will receive regular inspections and preventative maintenance to ensure that accessible elements are in proper working order. If an accessible element (ramp) is damaged and is unusable a service disruption notification will be placed in all common areas and all entrance doors as well as emails sent to staff and visitors will be notified upon booking an appointment. Due to COVID, no walk-in visitors are accepted at this time.

Emergency maintenance will take place to ensure that the accessible element is restored to working order as soon as parts/labour can be obtained.

Status: In progress

EVALUATION

Listening to feedback is an integral part of the evaluation process. Wincon will continue to review and expand consultation strategies to engage key groups, staff, visitors and clients, in providing accessibility related feedback, including people with disabilities. For more information on how you can provide feedback on this Plan, please forward your responses to HR@wincon-security.com.

Additional evaluation and reporting efforts include:

- Annual review of the Plan

FURTHER INFORMATION

If you have a question about the Multi-Year Accessibility Plan, please contact:

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A copy of the Multi-Year Accessibility Plan is available upon request by contacting the Human Resources Department. In addition, a copy of this policy is available on the Company's website at www.wincon-security.com.