

CAMERON STEPHENS

Policy Number & Title:

HR-1.0 Multi-Year Accessibility Plan

Last Updated: **December 2023**

Approved by: Scott Cameron

1.0 Purpose and Statement of Commitment

This accessibility plan outlines the policies and actions that Cameron Stephens Mortgage Capital Ltd. (hereinafter referred to as “CSMC”) has put in place to improve opportunities for people with disabilities. CSMC is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are 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 (AODA).

Under the AODA and the Integrated Accessibility Standards Regulation (IASR), the following accessibility standards set the requirements that are applicable to CSMC:

- Customer Service;
- Information and Communications;
- Employment; and
- Design of Public Spaces.

2.0 General Requirements

CSMC is committed to continuing to comply with all general requirements set out by the AODA and the IASR. This includes the requirement to develop, implement, and maintain written policies and procedures; and the requirement to train all employees, volunteers, and other members of the organization on the requirements of the accessibility standards set out in the IASR and in the Ontario *Human Rights Code* as it relates to persons with disabilities.

Actions:

- CSMC has developed, implemented, and maintained an Accessibility Policy (4.3 Accessibility Standards for Customer Service Policy). The Policy is reviewed and updated annually. The Policy is posted on our website and is available in an accessible format, upon request.
- CSMC has developed, implemented, and maintained a Multi-Year Accessibility Plan (HR-1.0). The Plan is reviewed and updated at least every five (5) years. The Plan is posted on our website and is available in an accessible format, upon request.
- CSMC has trained and will continue to train all employees on Ontario’s accessibility laws, the Ontario *Human Rights Code* as it relates to people with disabilities, and the accessibility requirements that apply to CSMC. Training is provided in a way that best

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suits the duties of employees. Training records are maintained by CSMC. The training is facilitated as follows:

- New Hire Orientation Program.
- Refresher Training is completed every year.

3.0 CUSTOMER SERVICE STANDARD

CSMC strives at all times to provide our services in a way that respects the dignity and independence of people with disabilities. We are committed to giving people with disabilities the same opportunity to access our services, and allowing them to benefit from the same services, in the same place and in a similar way as other clients.

Actions:

- CSMC has met and continues to meet all requirements of the Customer Service Standard, including the establishment of policies related to the use of service animals and support persons; notice of temporary service disruptions; training employees; providing documents in an accessible format or with communication supports upon request; and establishing a feedback process.
- The detailed Customer Service Standard policy and procedure (4.3 Accessibility Standards for Customer Service Policy) is available in an accessible format, upon request.

4.0 INFORMATION AND COMMUNICATIONS STANDARD

CSMC is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

Website

CSMC has met the website requirements of WCAG 2.0, Level AA. All new content will continue to be reviewed regarding the requirements of WCAG 2.0, Level AA.

Accessible Formats and Communication Supports

CSMC has taken and will continue to take steps to make sure all publicly available information is made accessible upon request. Where a request for an accessible format or communication support is received, we will:

- Consult with the individual making the request to determine their accessibility needs and what would be a suitable format or support.
- Provide the requested information in a timely manner.

Accessible Emergency Information

CSMC will continue to provide contractors, 3rd parties or any members of the public with publicly available emergency information in an accessible format, upon request.

Feedback Processes

CSMC is committed to ensuring our feedback processes are accessible to people with disabilities by offering various methods of providing feedback, i.e., email, phone, in-

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person, etc., and will provide our feedback process in an accessible format, upon request. Please refer to 4.3 Accessibility Standards for Customer Service Policy which details the feedback process and the designated individual responsible for receiving the feedback.

5.0 EMPLOYMENT STANDARD

CSMC is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

- Accessible recruitment and selection processes;
 - CSMC notifies candidates that accommodations are available upon request by including accommodation statements in all job ads posted; when contacting candidates to schedule interviews; and in offers of employment sent to prospective employees.
- Accessible formats and communication supports;
 - CSMC's Human Resources Policies and Procedures Manual contains a Internet, E-mail, Electronic media, Equipment & Devices Policy that notifies employees that we will provide accessible formats and communication supports, upon request.
- Workplace emergency response information;
 - CSMC is committed to providing employees with emergency information in an accessible format, upon request.
 - CSMC's Human Resources Policies and Procedures Manual includes a Workplace Accommodation Policy that states that we will provide individualized workplace emergency response information to employees, in an accessible format, upon request.
 - Upon hire, all employees are required to complete the Employee Information Form, and when necessary, CSMC will develop an individualized emergency response plan, if requested.
- Documented individual accommodation plans;
 - CSMC's Human Resources Policies and Procedures Manual includes a Workplace Accommodation Policy that notifies employees of our individual accommodation plan process.
- Performance management, career development, and advancement;
 - CSMC's Human Resources Policies and Procedures Manual includes a Performance Management Policy that notifies employees that accommodations are available when required per our individual accommodation plan process.
- Return to work process.
 - CSMC's Human Resources Policies and Procedures Manual includes a Workplace Accommodation Policy that notifies employees of our individual accommodation plan process for employees returning to work and requiring accommodations.

Actions:

- All policies are documented in the Human Resources Policies and Procedures Manual and have been implemented.

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6.0 DESIGN OF PUBLIC SPACES STANDARD

CSMC is committed to increasing accessibility to the public spaces of our facilities. In 2023, CSMC made major renovations to our Toronto location, including public spaces such as waiting areas, service counters, washrooms, hallways, etc. These redeveloped areas meet the general requirements as outlined in the Design of Public Spaces Standard, as well as the accessibility requirements in Ontario's *Building Code*.

Preventative and Emergency Maintenance

CSMC will continue to maintain the accessible elements in public spaces of our facilities through regular monitoring, preventative maintenance, and emergency maintenance, if required.

Temporary Disruptions

CSMC will continue to respond to any temporary disruptions when accessible elements in public spaces of our facilities are not in working order by notifying the public of the disruption. The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances, service counters, and/or reception areas at CSMC's premises.

7.0 Additional Information

This policy will be reviewed at least every five (5) years, and CSMC will continue to file the Accessibility Compliance Reports.

For more information on this accessibility plan, please contact **Kristina Mark**, Manager, Office of the CEO and EVP:

- By email to: kmark@cameronstephens.com
- By phone to: (416) 591-8787 ext.227

Accessible formats of this document are available upon request from: **Kristina Mark**, Manager, Office of the CEO and EVP.

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