

<b>De Lage Landen Canada Corporate Policy</b>	
<i>Subject:</i>	<b>AODA – Integrated Accessibility Standards Policy</b>
<i>Origination/Effective Date:</i>	December 1, 2023
<i>Revision Dates:</i>	January 1, 2014, November 24, 2020, December 1, 2023
<i>Owner/Responsibility:</i>	Human Resources Department

**Purpose**

De Lage Landen Financial Services Canada Inc. (DLL) 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 persons 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.

**Scope**

This policy applies to all members of DLL Canada.

**Policy**

The following policy has been established by De Lage Landen Financial Services Canada Inc. (“DLL”) to govern the provision of services in accordance with Regulation 191/11, “Integrated Accessibility Standards” (“**Regulation**”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**Act**”). These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

DLL is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

**ACCESSIBILITY PLAN**

DLL has developed, will maintain and will document an Accessibility Plan outlining DLL’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on DLL’s website. Upon request, DLL will provide a copy of the Accessibility Plan in an accessible format.

## **Training**

DLL will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its members and volunteers;
- all persons who participate in developing DLL's policies; and,
- all other persons who provide goods, services, or facilities on behalf of the company where applicable.

The training will be appropriate to the duties of the members, volunteers, and other persons.

Members will be trained when changes are made to the accessibility policy. New members will be trained during the orientation process, or as soon as practicable thereafter.

DLL has taken the following steps to ensure members are provided with the training needed to meet Ontario's accessibility laws by November 30, 2020. DLL will also keep a record of the training it provides.

## **INFORMATION AND COMMUNICATIONS STANDARDS**

### **Feedback**

DLL will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

#### **Accessible Formats and Communication Supports**

Upon request, DLL will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

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

DLL will also notify the public about the availability of accessible formats and communication supports.

#### **Accessible Websites and Web Content**

DLL will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impractical.

## **EMPLOYMENT STANDARDS**

### **Recruitment**

DLL will notify its members and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### **Recruitment, Assessment or Selection Process**

DLL will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests accommodation, DLL will consult with the applicant and provide, or arrange for the provision of, suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

### **Notice to Successful Applicants**

When making offers of employment, DLL will notify the successful applicant of its policies for accommodating employees with disabilities.

### **Informing Members of Supports**

DLL will continue to inform its members of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account a member's accessibility needs due to disability. This information will be provided to new members as soon as practical after commencing employment.

### **Accessible Formats and Communication Supports for Members**

Upon the request of a member with a disability, DLL will consult with the member to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other members. In determining the suitability of an accessible format or communication support, DLL will consult with the member making the request.

### **Workplace Emergency Response Information**

DLL will provide individualized workplace emergency response information to members who have a disability; provided that the disability is such that individualized information is necessary, and if DLL is aware of the need for accommodation due to the member's disability, DLL will provide this information as soon as practical after becoming aware of the need for accommodation.

When the member requires assistance, DLL will, with the consent of the member, provide the workplace emergency response information to the person designated by DLL to help the member.

DLL will review the individualized workplace emergency response information when the member moves to a different location in the organization, when the member's overall accommodations needs or plans are reviewed, and, whenever DLL reviews its general emergency response policies.

### **Documented Individual Accommodation Plans**

DLL will maintain a written process for the development of documented individual accommodation plans for members with disabilities. If requested, information regarding accessible formats and communications support provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

### **Return-to-Work Process**

DLL maintains a documented return to work process for its members who have been absent from work due to a disability and who require disability-related accommodation in order to return to work.

The return-to-work process outlines the steps DLL will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return-to-work process will not replace or override any other return to work process created by or under any other statute (i.e., the *Workplace Safety Insurance Act, 1997*).

**Performance Management, Career Development and Advancement & Redeployment**

DLL will consider the accessibility needs of members with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

**QUESTIONS ABOUT THIS POLICY**

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of the policy is not understood, an explanation will be provided by Human Resources and/or a manager of DLL.

The policy document will be provided in a format that considers the person's Disability. For more information or to request a document in alternative format, please contact:

Human Resources  
[canada.hr@dllgroup.com](mailto:canada.hr@dllgroup.com)