

# **TSL LIMITED**

## **MULTI-YEAR ACCESSIBILITY PLAN**

### **2024 - 2028**

#### **STATEMENT OF COMMITMENT:**

TSL Limited is committed to meeting the accessibility needs of persons with disabilities in an effective and timely manner by preventing and removing barriers for persons with disabilities in accordance with the Integrated Accessibility Standards Regulation (IASR). TSL Limited's goal is to foster an inclusive organizational culture that is guided by the principles and requirements of the Accessibility for Ontarians with Disabilities Act (AODA), 2005, the IASR and the Ontario Human Rights Code ("Code").

TSL Limited's plan shows how we will play our role in making Ontario an accessible province for all Ontarians.

The plan is reviewed and updated at least once every 5 years.

## PART 1 – GENERAL REQUIREMENTS

### IASR Section 3 - 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 under the accessibility standards referred to in the Regulation.

**Action:** TSL Limited will develop all policies and procedures necessary to comply with the requirements set forth by AODA.

**Status:** Complete

**Compliance Date:** January 24, 2024

### IASR Section 4 - Accessibility Plans

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.

**Action:** Leadership to identify barriers on an ongoing basis, review the plan periodically and make changes as necessary.

**Status:** Complete

**Compliance Date:** January 24, 2024

### IASR Section 6 - Self-Service Kiosks

6. (2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring, or acquiring self-service kiosks.

**Action:** Not Applicable

**Status:** Not Applicable

**Compliance Date:** Not Applicable

### IASR Section 7 - Training

7. 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.

**Action:** TSL Limited will train all applicable parties to fulfill the requirements set forth in the regulation.

**Status:** In progress for current employees / Ongoing for new hires

**Compliance Date:** Ongoing

## **PART 2: INFORMATION AND COMMUNICATION STANDARDS**

### **IASR Section 11 - Feedback**

11. 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 accessible feedback and communication supports, upon request.

**Action:** Feedback will be accessible through a variety of means (Email, Phone, Mail, In-Person). All staff will be made aware of the need to accommodate upon requests and how to handle said requests.

**Status:** Complete – Will address as required

**Compliance Date:** January 17, 2024

### **IASR Section 12 - Accessible Formats and Communication Support**

12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communications supports for persons with disabilities,

- a) In a timely manner that considers 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

(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.

(3) Every obligated organization shall notify the public about the availability of accessible formats and communications supports.

**Action:** TSL Limited will determine the accessible formats and communication supports which will be provided to persons with disabilities upon request (within 24 hours, if not immediately).

**Status:** Complete – Review with each accommodation request

**Compliance Date:** January 16, 2024

### **IASR Section 13 - Emergency Procedures, Plans, or Public Safety Information**

13. In addition to its obligation under section 23, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

**Action:** TSL Limited will post emergency procedures, plans and safety information in areas where available to the public. This information will be provided through a variety of accessible means, as requested.

**Status:** Complete

**Compliance Date:** January 24, 2024

### **IASR Section 14 - Accessible Websites and Web Content**

14. Designated public sector organization and 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.

All internet websites and web content must conform with WCAG 2.0 Level AA, other than,

- Success criteria 1.2.4. Captions (Live)
- Success criteria 1.2.5. Audio Descriptions (Pre-Recorded)

**Action:** We will ensure that the website conforms to the WCAG 2.0 Level AA Standards.

**Status:** Complete

**Compliance Date:** February 27, 2024

**IASR Section 15 - Educational and Training Resources and Material**

15. (1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:
1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by,
    - a) Procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or
    - b) Arranging for the provision of a comparable resources in an accessible or conversion ready electronic format, if educational or training resources or material cannot be procured , obtained by other means or converted into an accessible format.
  2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

**Action:** Not Applicable

**Status:** Not Applicable

**Compliance Date:** Not Applicable

**IASR Section 16 - Training to Educators**

16. (1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.
- (2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.

**Action:** Not Applicable

**Status:** Not Applicable

**Compliance Date:** Not Applicable

**IASR Section 17 - Producers of Educational or Training Material**

17. (1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.
- (2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions.

**Action:** Not Applicable

**Status:** Not Applicable

**Compliance Date:** Not Applicable

**IASR Section 18 - Libraries of Educational and Training Institutions**

18. (1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure, or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or material for a person with a disability, upon request.

(2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection(1).

**Action:** Not Applicable

**Status:** Not Applicable

**Compliance Date:** Not Applicable

**PART III – EMPLOYMENT STANDARD**

**IASR Section 22 - Recruitment – General**

22. Every employer shall notify its employees and the public about availability of accommodation for applicants with disabilities in its recruitment processes.

**Action:** TSL Limited includes in all job postings a statement regarding availability of accommodations if required. The statement is reiterated throughout the recruitment process.

**Status:** Ongoing as required

**Compliance Date:** January 12, 2024

**IASR Section 23 - Recruitment, Assessment, or Selection Process**

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.

(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 applicants accessibility needs due to a disability.

**Action:** TSL Limited reiterates the availability of accommodations throughout the recruitment process. If required, TSL Limited will accommodate job applicants as necessary. TSL Limited also will identify barriers throughout the recruitment process and will accommodate where possible.

**Status:** Ongoing as required

**Compliance Date:** January 12, 2024

**IASR Section 24 - Notice to Successful Applicants**

24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.

**Action:** TSL Limited will state when offering employment, both verbally and in the agreement, that accommodations will be supported regarding the accessibility needs of employees.

**Status:** Ongoing as required

**Compliance Date:** January 12, 2024

**IASR Section 25 - Informing Employees of Supports**

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 consider an employee's accessibility needs due to disability.
- (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.
- (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that consider an employee's accessibility needs due to disability.

**Action:** Policy posted on communication board and sent via email to all employees. New hires will be provided with accessibility policies and training as part of onboarding process.

**Status:** Complete

**Compliance Date:** January 26, 2024

**IASR Section: 26 - Accessible Formats and Communication Supports for Employees**

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.
  - a) Information that is needed to perform the employee's job; and
  - b) Information that is generally available to employees in the workplace
- (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

**Action:** TSL Limited informs employees of the availability of accommodations regarding accessible formats and communication supports and ensures accessibility needs are met through an individualize accessibility plan, as needed.

**Status:** Complete and ongoing as required.

**Compliance Date:** January 17, 2024

**IASR Section 27 - Workplace Emergency Response Information**

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.
- (2) If an employee who receives individualized workplace emergency response information requires assistance, the employer shall provide the workplace emergency response information to the person designated by the employer to the aid the employee.
- (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.
- (4) Every employer shall review the individualized workplace emergency response information,
  - 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.

**Action:** If TSL Limited becomes aware of an employee's disability, the Company will ensure that the employee is provided on emergency response protocols that consider their individualized requirements. We will review individualized workplace emergency response information every year, or as changes occur. We will ensure that individualized emergency response information is updated and communicated to the affected employees.

**Status:** Ongoing as required.

**Compliance Date:** January 17, 2024

**IASR Section: 28 - Documented Individual Accommodation Plans**

28. (1) Employers, other than employers that are small organizations, shall develop and have in place in written process for the development of documented individual accommodation plans for employees with disabilities.
- (2) The process for the development of documented individual accommodation plans shall include the following elements:
- a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
  - b) The means by which the employee is assessed on an individual basis.
  - c) The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.
  - d) 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.
  - e) The steps taken to protect the privacy of the employee's personal information.
  - f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
  - g) If an individual accommodation plan is denied, the manner in which reasons for the denial will be provided to the employee.
  - h) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

**Action:** TSL Limited has developed a written process for implementing individual accommodation plans for persons with disabilities. Available upon request. Communication about individual accommodation plans is shared with employees upon onboarding, and as changes occur.

**Status:** Complete

**Compliance Date:** January 17, 2024

**IASR Section 29 - Return to Work Process**

29. (1) Every employer, other than an employer that is a small organization,
- 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
  - b) Shall document the process.
- (2) The return-to-work process shall,
- 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
  - b) Use individual documented accommodation plans, as described in section 28, as part of the process

(3) The return-to-work process referenced in this section does not replace or override any other return to work process created by or under any other statute.

**Action:** TSL Limited has developed a written process for implementing a return-to-work plan for persons with disability. Available upon request.

**Status:** Complete

**Compliance Date:** January 24, 2024

**IASR Section 30 - 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.

**Action:** Not Applicable

**Status:** Not Applicable

**Compliance Date:** Not Applicable

**IASR Section 31 - Career Development and Advancement**

31. (1) An employer that provides career development and advancement to its employees shall consider 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.

**Action:** TSL Limited considers accessibility needs and individual accommodation plans when making career development and advancement decisions.

**Status:** Ongoing

**Compliance Date:** January 17, 2024

**IASR Section 32 - Redeployment**

32. 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.

**Action:** TSL Limited will consider the accessibility need and individual accommodation plans when making redeployment opportunities.

**Status:** Ongoing

**Compliance Date:** January 17, 2024

TSL Limited accessibility policies are available upon request.