



## **ELEMENT FLEET MANAGEMENT (“ELEMENT”)**

### **Accessibility Policy**

As of December 1, 2017

#### **1. Introduction and Scope**

- a. Consistent with our Code of Business Conduct and Ethics Element Fleet Management is committed to providing a workplace that is accessible to all persons and to treating persons with disabilities in a way that allows them to maintain their dignity and independence. Element will work to remove barriers that impact persons with disabilities and to prevent building new barriers.
- b. Element is committed to diversity, inclusion and accessibility for persons with disabilities. This relates to all terms and conditions of employment including but not limited to recruitment, testing, job selection, job assignment, working conditions, scheduling, benefits, training and development, promotion, transfer and termination of employment.
- c. This Policy describes how Element will work with its employees and how it will provide its programs and services in a manner that respects the dignity, independence, integration of, and provide equal opportunity to, persons with disabilities.
- d. This Accessibility Policy is applicable in Canada. The Policy may be modified and adopted for use in other countries where Element has business and operations.

#### **2. Process**

##### **A. Assistive Devices**

- Element welcomes persons with disabilities to use their own assistive devices while on the premises and/or while performing work for or on behalf of Element.
- Personal assistive devices are the responsibility of the Element employee or prospective employee.
- Every effort will be made to facilitate and accommodate the use of assistive devices at Element. Examples may include, but are not limited to, providing additional space to accommodate the assistive device, ensuring power source access, providing additional power requirements, ensuring employee physical proximity placement within the office space, or reconfiguring portable cubical office areas.
- Requests that may involve construction or reconstruction of physical space that may involve the building and property will be directed to the Landlord/Lessor, as applicable, for consideration. Requests and considerations should comply with the Accessibility Amendments to the Ontario Building Code as well as applicable local municipal building codes and specific requirements within the Lease, Contract or Tenant Agreement.

##### **B. Information and Communication**

- Element is committed to communicating with persons with disabilities in ways that consider the disability and allow for effective communication to ensure that those with disabilities are able to participate, compete or partake in the Element offering or work.

- Upon request, Element will arrange for communications supports and/or provide information in an accessible format to persons with disabilities.
- As applicable, Element may accommodate requests from employees with disabilities to identify communication needs with colleagues and external parties as necessary. For example, a hearing-impaired employee may request that the Element Email Address List identify their individual listing with a request that include Telecommunication Device for the Deaf (“TTY”) access required.
- Upon request, Element will consult with employees with disabilities to ensure that the information the employee needs to perform the employee’s job and information that is generally available to employees in the workplace is provided in an accessible format and/or the appropriate communication supports are provided with respect to same.
- When necessary, Element will provide individualized workplace emergency response information to employees who have a disability. If the employee will require assistance in an emergency, Element will, with the employee’s consent, provide the workplace emergency response information to the person designated to provide assistance to the employee.
- Element will review the individualized workplace emergency response information for an employee when the employee changes work location, when the employee’s accommodation plans are reviewed, and when Element reviews its emergency response policies.

C. Service Animals and Support Persons

- Element welcomes onto its premises service animals and support persons upon whom persons with disabilities rely. Persons and the service animal or support person are allowed to be in the Element offices together. Support persons are not allowed to be in the Element office without the Element employee present.
- Element will advise the parties as soon as possible about any costs they will incur associated with having the support person or service animal. Element will also advise parties of any associated requirements and accommodations as required by the Landlord/Lessor in association with building and property use and access.
- Other types of service or support assistance will be considered on a case-by-case basis and may require the provision of supporting documentation.

D. Barrier Assessment

- Element will perform written assessment(s) for barriers to accessibility on a biennial basis.
- Barrier assessment(s) will include consideration of the following types of barriers to accessibility:
  - i. Attitudinal barriers
  - ii. Information barriers (accessing and receiving)
  - iii. Communication barriers (understanding)
  - iv. Physical and architectural barriers
  - v. Technological barriers
  - vi. Systemic barriers (policies, programs, practices, procedures)
- The assessment shall include considerations for invisible disabilities, such as but not limited to: Mental illness, developmental disabilities, and learning disabilities, hidden medical disability.

E. Recruitment, Assessment, and Accommodation of Employees

- Element will notify its employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process.
- Element will notify applicants that accommodations for disabilities are available upon request in relation to materials or processes to be used for recruitment and will consult with any applicants who request accommodation in order to arrange for suitable accommodation to address the applicant's disability related needs.
- Element will ensure employees are aware that job accommodations are available for employees with disabilities.
- Element will work with employees who request accommodation related to a disability to develop an individual accommodation plan to address the employee's disability-related accessibility needs.
- Element will facilitate the return to work of employees who were absent because of their disability in accordance with its return to work process.
- Element will consider the accessibility needs of employees with disabilities with respect to any performance management process, career development and advancement programs, or redeployment programs it may provide from time to time.

#### F. Individual Accommodation Plan Process

- Employees with disabilities who require accommodation should make their request for accommodation to the Vice President of Human Resources or their Human Resources Business Partner.
- Upon receipt of the request, Element will review it and work with the employee to develop an individual accommodation plan for the employee as required. Upon request and within reason, a representative of the employee may be permitted to participate in developing the individual accommodation process for the employee.
- Depending on the nature of the disability and the request, Element may require additional information, such medical information.
- If medical information is required, Element may request that this information be provided from either the employee's health care practitioner or a third-party health care practitioner at its own expense. Element may also engage the assistance of its third-party benefit provider in preparing an individual's accommodation plan.
- Element will limit participation in an employee's accommodation plan and information relating to an employee's request for accommodation to those within the organization who need the information in order to develop and/or carry out the plan in order to protect the privacy of the employee's information.
- If an employee's request for disability-related accommodation is denied, the employee will be advised in writing or in another appropriate format if requested.
- Once the accommodation plan has been created, it will be provided to the employee in writing or in another format that takes into account any disability-related needs.
- Element will review the plan if there is a change in the employee's circumstances or on an annual basis.

#### G. Training Employees

- Element employees (and any volunteers, agents and/or contractors who act on behalf of Element) will receive training on the Accessibility for Ontarians with Disabilities Act, applicable

provisions of the Ontario Human Rights Code, Element's accessibility policies, and providing accessible customer service.

- Training on accessible customer service will include:
  - how to interact and communicate with persons with various types of disabilities
  - how to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person
  - how to use equipment or devices available on Element's premises that may help with the provision of goods, services or facilities to a person with a disability
  - what to do if a person with a particular type of disability is having difficulty accessing Element's services
- Training will occur on an ongoing basis as required and whenever changes are made to policies, programs or procedures.
- Training may be provided in various forms including but not limited to: Online course, classroom course, meeting, written policy or procedure review and acknowledgement, webinar, or any other method that effectively communicates the ongoing training of a policy, program or procedure or changes thereto.

F. Notice of Temporary Disruptions

- Element will provide advance notice of temporary disruption of service or access to the person with a disability as soon as possible.
- Notice of disruption will include the reason for the disruption, the expected duration, and a description of alternative facilities, services or workplace alternatives, if any, that are available. Notice will be provided by posting(s) on the premises or by some other method that is reasonable in the circumstances.

### 3. Procedure

- a. To request accommodation or assistance for any program or service, contact Element via email or phone with the specific request.
- b. Requests should be made to:
  - Vice President, Human Resources (or Designee)
  - [jramgoolam@elementcorp.com](mailto:jramgoolam@elementcorp.com)
  - 905-366-8900

### 4. Feedback

- a. Element encourages and welcomes feedback on how it provides programs and services to persons with disabilities. Feedback can be provided using one of the following methods: Email, phone, mail, or in person.
- b. To provide feedback please contact:
  - Vice President, Human Resources, or Designee
  - Element Fleet Management
  - 4 Robert Speck Parkway
  - Mississauga, ON L4Z 1S1
  - 905-366-8900
  - Hr.fleet.ca@elementcorp.com

- c. Upon receipt of feedback regarding the provision of programs and services to persons with disabilities, the Vice President of Human Resources, or a Designee, will review the feedback, take appropriate action, and make every effort to respond to the feedback quickly and effectively.

**5. Governance**

Exceptions to this Policy shall be reviewed and approved by SVP, Compliance. Questions regarding the appropriate interpretations of this Policy shall be directed to the EHS Compliance Director or the VP, Human Resources, Canada. This Program shall be reviewed on a periodic basis or at the determination of upon change in applicable law, or in applicable business lines, products, processes or practices.

**6. Document Change History**

<b>Version</b>	<b>Date</b>	<b>Changes</b>
001	12/01/2017	Policy issuance

Element Multi-Year Accessibility Plan is located [here](#).