

## Policy

### Accessibility

<b>Owner</b>	Chief People Officer
<b>Effective date</b>	Oct 4, 2023
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<b>Frequency of review</b>	Every 3 years

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## 1. Purpose

The University Pension Plan Ontario (“UPP”) is committed to principles of independence, dignity, integration, and equality of opportunity for persons with disabilities. UPP aims to ensure that all Personnel, members of the Plan and/or public, contractors, vendors, regulators and other third parties can access services and information when and how they need it.

Under this Accessibility Policy (“Policy”), UPP is committed to complying with both the Accessibility for Ontarians with Disabilities Act (“AODA”) and the Ontario Human Rights Code.

## 2. Scope

This Policy applies to all Personnel.

## 3. Definitions

Defined terms not otherwise set out in this Policy are deemed to have the meaning set out in the AODA and its regulations or the Ontario Human Rights Code, as applicable.

**Human Capital Committee:** The committee of the Board of Trustees whose terms of reference include human capital issues, constituted from time to time.

**Personnel:** All UPP employees, co-op students and interns, contractors, affiliates, and anyone else who works on behalf of the organization.

## 4. Policy Objectives

The objectives of this Policy are to:

- Outline UPP's commitment to providing and maintaining an accessible work environment
- Outline UPP's policy and practices to help identify, remove, and prevent barriers to people with disabilities in our working environment
- Provide clear guidance on how UPP will achieve the applicable obligations and responsibilities under the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario Human Rights Code

## 5. General Policy Statements

### 5.1. Core Principles of the Policy

UPP endeavors to ensure the Policy and related practices, policies and procedures are consistent with the core principles of dignity, equality of opportunity, integration (wherever possible) and independence.

### 5.2. Accessibility Plan

UPP will develop a Multi-Year Accessibility Plan that outlines a strategy to prevent and remove barriers for individuals with disability and to address the requirements of all applicable legislation, including the AODA and its regulations. UPP will post the Accessibility Plan on the organization's website and provide the Accessibility Plan in an Accessible Format upon request. UPP will also prepare an annual status report on the measures taken to implement the Accessibility Plan. In consultation with persons with

disabilities and as required, UPP will review and update the Accessibility Plan at least every five (5) years.

### 5.3. Training

UPP provides training to all Personnel or anyone else working on behalf of the organization in Ontario or responsible for the development of UPP policies, and maintains records of such training, in accordance with the requirements as set out by AODA and the Code as it relates to persons with disabilities.

A record of such training is maintained by the UPP People Team. Personnel also receive updates when changes are made to this Policy.

### 5.4. Information and Communication

UPP notifies Personnel and the public about the availability of Accessible Formats and Communication Supports. Upon request UPP will, in a timely manner and at no additional cost, provide or arrange for the provision of Accessible Formats and Communication Supports that considers the person's accessibility needs due to disability (unless such information is unconvertible).

UPP ensures its internet websites and web content comply with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA unless otherwise impracticable.

### 5.5. Employment

#### **Recruitment, Selection and Assessment**

UPP notifies Personnel, potential candidates, and the public that accommodations can be made during the engagement, recruitment or hiring processes. If an applicant requests accommodation, UPP consults with the applicant and provides or arranges for the provision of a suitable accommodation in a manner that considers the applicant's accessibility needs. UPP also ensures that when making offers of employment, it notifies the successful applicant of its policies on accommodating Personnel with disabilities.

#### **Communications and Informing Personnel**

UPP notifies its Personnel of its policies (and any updates thereto), used to support individuals with disabilities, including policies on the provision of job accommodations that consider a Personnel's accessibility needs due to disability. This information is provided to new UPP Personnel as soon as practicable after they begin employment.

#### **Documented Individual Accommodation and Return to Work Plans**

UPP puts in place a written process for the development of documented individual accommodation and return to work plans for Personnel with disabilities that comply with the AODA and its regulations. Where requested, a Personnel's individual accommodation and/or return to work plan includes any information regarding the provision of Accessible Formats and Communications Supports.

#### **Performance Management, Career Development and Redeployment Processes**

UPP's performance management, career development and redeployment processes consider the accessibility needs of Personnel.

## 5.6. Workplace Emergency Response Information

UPP provides individualized workplace emergency response information to Personnel when it becomes aware of the need for accommodation due to disability. UPP provides this information as soon as practicable after becoming aware of the need for accommodation.

## 5.7. Notice of Temporary Disruptions

UPP notifies individuals if there is a planned or unexpected disruption of a facility or if service persons with a disability require access to UPP services. The notice is posted at the entrance of the premises (if applicable) and/or on the home page of UPP's website and complies with the requirements of the AODA and its regulations.

## 5.8. Service Animals

Persons with a disability who are accompanied by a service animal may access premises owned or operated by UPP if the public has access to such premises (other than in the case of Personnel who have access to non-public premises), and the animal is not otherwise excluded by law or by reason of a health and safety consideration that cannot be remedied. If a service animal is excluded for such reasons, UPP ensures that alternate means are available within a reasonable time and location to provide access to UPP's services. If it is not readily apparent that an animal is a service animal, UPP Personnel may ask for verification of the animal's status as a service animal. It should be noted that the use and safety of the service animal is the responsibility of the person with a disability.

## 5.9. Support Persons

Persons with a disability may be accompanied by a support person, where the support person has been hired or chosen to accompany them in order to assist in accessing goods or services unless a health and safety or other lawful consideration would prevent such access, in which case UPP ensures that alternate means are available within a reasonable time and location to provide access to UPP's services.

## 5.10. Mobility Aids and Assistive Devices

Persons with a disability may use mobility aids or other assistive devices while on UPP premises in order to assist in accessing goods or services unless a health and safety or other lawful consideration would prevent such use, in which case UPP ensures that alternate means are available within a reasonable time and location to provide access to UPP's services. It is the individual's responsibility to use such aids or devices in a safe manner while on UPP premises.

## 5.11. Feedback

Feedback about the delivery of services to, or engagement or employment experience of persons with disabilities is welcomed by UPP, as it may identify areas that require change and will assist in UPP's goal of continuous service improvement.

Where possible, feedback will be addressed immediately, with UPP making best efforts to provide a response in the same format in which the feedback was received. Some feedback may, however, require more effort to address and may need to be reviewed before an action is taken. UPP will respond within 28 working days.

Feedback may be provided directly to UPP as follows:

Attn.: Sonam Ringpa, Associate Director, Equity, Diversity, Inclusion & Reconciliation

Phone: 647-619-1846  
Email: sonam.ringpa@universitypensionplan.ca  
Website: <https://www.myupp.ca/contact-us/>

## 6. Exceptions

There are no exceptions to this Policy.

## 7. Monitoring, Reporting and Compliance

The People Team is accountable for identifying incidents of potential non-compliance under this Policy based on established procedures. All instances of non-compliance must immediately be reported to the Chief People Officer. Incidents of non-compliance will be reported to the Human Capital Committee on a quarterly basis.

## 8. Related Policies and Other Documents

- Code of Conduct
- Occupational Health and Safety Policy
- Ontario Human Rights Code: <https://www.ontario.ca/laws/statute/90h19>
- Ontario Integrated Accessibility Standards: <https://www.ontario.ca/laws/regulation/110191>
- Ontario Accessibility for Ontarians with Disabilities Act, 2005: <https://www.ontario.ca/laws/statute/05a11>

## 9. Approval

This Policy is reviewed by the Human Capital Committee at least every 3 years, or as required based on changes in statutory or regulatory requirements, or UPP's operations.

<b>Version</b>	1.2
<b>Reviewer</b>	Human Capital Committee
<b>Review Date</b>	June 19, 2023
<b>Approver</b>	Board of Trustees
<b>Approval Date</b>	Oct 3, 2023