

METRO ONTARIO INC.: MULTI-YEAR ACCESSIBILITY PLAN (updated Dec. 16, 2019)

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INTRODUCTION AND STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (“**IASR**”) under AODA require that (from January 1, 2014), Metro Ontario Inc. and its applicable subsidiaries including Metro Ontario Pharmacies Limited (together, “**Metro**”), establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

This multi-year accessibility plan outlines Metro’s strategy to prevent and remove barriers to address the current and future requirements of AODA.

Under AODA, the following accessibility standards and requirements are applicable to Metro:

- I. Information and Communications
- II. Employment
- III. Built Environment
- IV. Customer Service.

In accordance with the requirements set out in the IASR, Metro will:

- Establish, implement, maintain and document this multi-year accessibility plan;
- Post this plan on its website (www.metro.ca);
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

December 2, 2019

INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS (IASR)

I. Designing, Procuring or Acquiring Self-Service Kiosks (Part I of IASR)

Commitment:

Metro is committed to having regard to the accessibility for persons with disabilities, when designing, procuring, or acquiring self-service kiosks. A “kiosk” is defined in the IASR as “an interactive electronic terminal, including point-of-sale device, intended for public use that allows users to access one or more services or products or both”.

Action:

In accordance with the IASR (Section 6), Metro has implemented the following regarding self-service kiosks:

- Metro will consider the needs of its customers with disabilities when designing, procuring or acquiring self-service kiosks in its stores, including but not restricted to point of sale payment devices (credit and debit card).

Completion date: January 1, 2014 and ongoing

II. Training (Part I of IASR)

Commitment:

Metro is committed to implementing a process to ensure that all employees, volunteers, third-party contractors who provide goods, services and facilities on Metro’s behalf, and persons participating in the development and approval of Metro’s policies, are provided with appropriate training on the requirements of the IASR and on the Ontario *Human Rights Code* (the “**Code**”) as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

Action:

In accordance with the IASR (Section 7), Metro:

- Has developed appropriate training;
- Determines and ensures that appropriate training on the requirements of the IASR and on the Code as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide goods, services and facilities on Metro’s behalf, and persons participating in the development and approval of Metro’s policies;
- Ensures that the training is provided to persons referenced above as soon as practicable;
- Keeps and maintains a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided; and
- Ensures that training is provided on any changes to the prescribed policies on an ongoing basis.

Completion date: December 31, 2014 and ongoing

III. **Information And Communication Standards** (Part II of IASR)

Commitment:

Metro is committed to making company information and communications accessible to persons with disabilities. Metro will incorporate new accessibility requirements under the Information and Communication Standards to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

A. Feedback, Accessible Formats and Communication Supports

Action:

In accordance with the IASR (Sections 11-12):

- **Feedback:** As of January 1, 2015, Metro ensures that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner; and
- **Accessible Formats and Communication Supports:** As of January 1, 2016, as a general principle where accessible formats and communication supports for persons with disabilities are requested, Metro will:
 - Provide or arrange for the provision of such accessible formats and communication supports;
 - Consult with the person making the request to determine the suitability of the accessible format or communication support;
 - Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
 - Notify the public about the availability of accessible formats and communication supports.

B. Accessible Websites and Web Content

Accomplishments to Date:

- Adoption of standards in Internet technology to ensure the public websites are moving away from non-W3C formats (World Wide Web Compliant) to more flexible Internet rich media in the website implementations, where practicable;
- All new websites released after January 1, 2014 and their web content are compliant with WCAG 2.0 Level A, unless not practicable due to significant impact on an

implementation timeline that was planned or initiated prior to January 1, 2012, subject to the exceptions provided in section 14 of the IASR Regulation; and

- For Metro's web content under Metro's direct control or control through a contractual relationship that allows for modification of the product, Metro provides the **eSSENTIAL** accessibility application tools. This service offers Metro's customers downloadable tools, at no cost to the customers. These tools provide vehicles for enhanced navigation of Metro's websites and communication support for customers who experience challenges typing, moving a mouse, and/or reading.

Commitment and Planned Action:

In accordance with the IASR (Section 14), Metro will make its internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and increasing to Level AA in accordance with the schedule set out in Section 14 of the IASR.

Implementation timeframe:

- All new websites released, and their web content, are compliant with WCAG 2.0 Level A, unless not practicable due to significant impact on an implementation timeline that was planned or initiated prior to January 1, 2012, subject to the exceptions provided in section 14 of the IASR Regulation.
- By January 1, 2021, all internet websites and web content, except for the relevant exclusions set out in the IASR, shall be compliant with WCAG 2.0 Level AA.

IV. Employment Standards (Part III of IASR)

Commitment:

Metro 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.

A. Recruitment

Action:

As of January 1, 2016, in accordance with the IASR (Sections 22-24), Metro is complying with the following requirements:

a) Recruitment: General

Metro notifies employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This includes:

- A review and, as necessary, modification of existing recruitment policies, procedures

and processes;

- Specifying that accommodation is available for applicants with disabilities, on Metro's website and on job postings; and
- Working with suppliers to ensure external Web pages are compliant with the Information and Communication Standards under the IASR's requirements.

b) Recruitment, Assessment and Selection

Metro notifies 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 in the assessment/selection process. This includes:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

c) Notice to Successful Applicants

When making offers of employment, Metro notifies the successful applicant of its policies for accommodating employees with disabilities. This includes:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- Inclusion of notification of Metro's policies on accommodating employees with disabilities in offer of employment letters.

B. Informing Employees of Supports

Commitment:

In accordance with the IASR (Section 25), Metro informs all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Action:

As of January 1, 2016, Metro:

- Informs current employees and new hires of Metro's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;

- Provides information under this section as soon as practicable after the new employee begins employment;
- Keeps employees up to date on changes to existing policies on job accommodations with respect to disability;
- Where an employee with a disability so requests, provides or arranges for provision of suitable accessible formats and communications supports for:
 - Information that is needed in order to perform the employee's job; and
 - Information that is generally available to employees in the workplace; and
- In meeting the obligations to provide the information that is set out in the paragraph above, consults with the requesting employee in determining the suitability of an accessible format or communication support.

C. Workplace Emergency Response Information

Commitment:

Where Metro is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information is provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Action:

As of January 1, 2012, in accordance with IASR (Section 27), Metro has implemented the following measures:

- Individualized workplace emergency response information procedures are developed for employees with disabilities, as required;
- Workplace Emergency Response Information forms are prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- Where required, Metro provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance are set out in individualized emergency plans for the employees;
- These individualized emergency plans are communicated to the employees' respective managers and Safety personnel, on an 'as needed' basis; and
- On an ongoing and regular basis, and as per the applicable terms of the IASR, Metro reviews and assesses general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

D. Documented Individual Accommodation Plans/Return to Work Process

Commitment:

Metro incorporates new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding

accommodation and return to work are followed, where applicable.

Action: As of January 1, 2016:

Metro's policies include steps that Metro will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

Metro reviewed and assessed the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

Metro ensures that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR (Sections 28-29):

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Include in the process the manner in which Metro can request an evaluation by an outside medical or other expert, at Metro's expense, to assist Metro in determining if and how accommodation can be achieved;
- Include in the process the manner in which the employee can request participation of a representative from his or her bargaining agent where an employee is in the bargaining unit, or the participation of another representative from the workplace where an employee is not in the bargaining unit;
- Steps are in place to protect the privacy of the employee's personal information;
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied;
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- If individual accommodation plans are established, ensure that they include:
 - Individualized workplace emergency response information that is required; and
 - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
 - Information that is needed in order to perform the employee's job; and
 - Information that is generally available to employees in the workplace; and
- Identify any other accommodation that is to be provided to the employee.

Metro ensures that the return to work process as set out in its existing policies outlines the steps Metro will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

E. Performance Management, Career Development and Redeployment

Commitment:

Metro takes 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;
- When providing career development and advancement to its employees with disabilities; and
- When redeploying employees with disabilities.

Action:

As of January 1, 2016, in accordance with the IASR (Sections 30-32), Metro:

- Reviews, assesses and, as necessary, modifies existing policies, procedures and practices to ensure compliance with the IASR;
- Takes the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when doing the following with employees with disabilities:
 - Using its performance management process;
 - Providing career development and advancement; and
 - Redeploying.

V. ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT (Part IV.1 of IASR)

The goal of the standards is to remove barriers in public spaces and buildings. Metro will ensure that any applicable requirements set out in the standards are followed.

Commitment:

For all public spaces for which Metro has entered into a contract on or after January 1, 2013 to construct or redevelop, Metro complies with all applicable standards in the IASR as of January 1, 2017.

A. Exterior Paths of Travel

Action:

As of January 1, 2017, when constructing all applicable new or redeveloped paths of travel (e.g., external walkways) that are not regulated by the Ontario Building Code, Metro ensures that they meet the requirements as set out in Sections 80.1 through 80.5 and 80.23 through 80.31 of the IASR. (Note: Most of the exterior paths of travel (e.g., external walkways) that are constructed by Metro are regulated by the Ontario Building Code.)

B. Accessible Parking

Action:

As of January 1, 2017, Metro ensures that when constructing new or redeveloping off-street parking facilities that it intends to maintain, the applicable off-street parking facilities meet the requirements set out in Sections 80.32 through 80.38 of the IASR.

C. Obtaining Services: Service Counters, Fixed Queuing Guides and Waiting Areas

Commitment:

As of January 1, 2017, for all newly constructed or replaced service counters, all newly constructed fixed queuing guides, and for all newly constructed or redeveloped waiting areas, Metro complies with the following requirements under the IASR:

a) **Service Counters** (Section 80.41)

Action:

When constructing new service counters, which includes replacing existing service counters, Metro meets the following requirements:

1. A minimum of one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter will be clearly identified with signage, where there are multiple queuing lines and service counters; and
2. Each service counter accommodates a mobility aid, where a single queuing line serves a single or multiple counters.

The service counter that accommodates mobility aids meets the following requirements:

1. The countertop height is such that it is usable by a person seated in a mobility aid;
2. There is sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required; and
3. The floor space in front of the counter is sufficiently clear so as to accommodate a mobility aid.

b) **Fixed Queuing Guides** (Section 80.42)

Action:

When constructing new fixed queuing guides, Metro meets the following requirements:

1. The fixed queuing guides provide sufficient width to allow for the passage of mobility aids and mobility assistive devices;
2. The fixed queuing guides have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction; and
3. The fixed queuing guides are be cane detectable.

c) Waiting Areas (Section 80.43)

Action:

When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating is accessible, but in no case shall there be fewer than one accessible seating space. For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait.

D. Maintenance

Action: As of January 1, 2017:

1. Metro has procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under these Accessibility Standards for the Built Environment; and
2. Metro has procedures for dealing with temporary disruptions when accessible elements required under the Accessibility Standards for the Built Environment are not in working order.

VI. ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE (Part IV.2 of the IASR)

Commitment:

Metro is in compliance with the Customer Service Standards under AODA and will continue to comply with the Standards.

Metro is committed to excellence in serving all customers, including persons with disabilities, and it will carry out its functions in a manner which delivers an accessible customer service experience.

Metro is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other customers.

Action:

Since January 1, 2012, the following measures have been implemented and are continuing to be implemented by Metro:

- Ensuring all persons who, on behalf of Metro, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities;

- Ensuring staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing Metro's goods or services;
- Ensuring completion of accessibility training is tracked and recorded;
- Offering to communicate with customers who contact customer service by TTY if telephone communication is not suitable to their needs;
- Ensuring customers accompanied by a guide dog or other service animal in areas of Metro open to the public and other third parties, are accommodated;
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated;
- Providing customers with notice in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances and customer service counters on Metro premises. If the disruption is long-term, Metro posts an announcement on its website informing customers of the location, duration of the disruption and alternate solutions;
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels; and
- Reporting compliance with the Customer Service Standards as required.

December 16, 2019