



DEVRY SMITH FRANK *LLP*
Lawyers & Mediators

MULTI-YEAR ACCESSIBILITY PLAN

Accessibility for Ontarians with Disabilities Act (2005) ("AODA")- Integrated Accessibility Standards Regulation ("IASR")

Intent

This 2024 to 2029 accessibility plan outlines the policies and actions that Devry Smith Frank *LLP* ("**DSF**") will implement to improve opportunities for people with disabilities in accordance with IASR requirements.

Statement of Commitment

DSF respects and upholds the requirements set forth under the AODA and its regulations, and strives to meet the needs of individuals with disabilities in a timely and effective manner.

Multi-Year Accessibility Plan

| Part I: General Requirements | | | | |
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| Initiative | IASR Requirement | Actions | Status | Compliance Deadline |
| 1.1 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 referred to in this Regulation. (2) Obligated organizations shall include a statement of organizational commitment to meet the accessibility needs of persons | DSF's <u>IASR</u> is available on DSF's intranet and on its external website. A copy is in the reception area. | Completed | April 30, 2024 |

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| | <p>with disabilities in a timely manner in their policies.</p> <p>(3) Large organizations shall,</p> <p style="padding-left: 40px;">(a) prepare one or more written documents describing its policies; and</p> <p style="padding-left: 40px;">(b) make the documents publicly available, and shall provide them in an accessible format upon request.</p> | | | |
| 1.2 Accessibility plans | <p>4. (1) Large organizations shall:</p> <p style="padding-left: 20px;">(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;</p> <p style="padding-left: 20px;">(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.</p> | <p>DSF's <u>Multi-Year Accessibility Plan</u> is available on DSF's intranet and on its external website.</p> <p>HR is responsible for the development, implementation and maintenance of this plan.</p> <p>A review and update schedule follows.</p> | Completed | April 30, 2024 |
| 1.3 Training | <p>7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,</p> <p style="padding-left: 40px;">(a) all employees, and volunteers;</p> <p style="padding-left: 40px;">(b) all persons who participate in developing the organization's policies; and</p> | <p>DSF determined that mandatory training is required on the following topics:</p> <ul style="list-style-type: none"> • Information/Communication and Employment Standards Training; • Human Rights (AODA); and • Design of Public Spaces (Built Environment) – optional | Completed | April 30, 2024 |

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| | <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p> <p>(2) The training on the requirements of the accessibility standards and on the <i>Human Rights Code</i> referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.</p> <p>(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p> <p>(5) Every large organization 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.</p> | <p>HR and IT teams provided three training methods to allow employees to receive all necessary training. The training methods consist up of combinations of online videos and presentations along with transcripts and brochures that can also be obtained in hard copies. Employees submit a <u>Confirmation of Training Form</u> to HR upon successful completion of the training provided.</p> | | |
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| PART II – Information and Communications Standards | | | | |
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| Initiative | IASR Requirement | Actions | Status | Compliance Deadline |
| 2.1 Feedback | 11. (1) 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 the provision of accessible formats and communications supports, upon request. | The following is posted on Reviews & Testimonials page of DSF's external website: <i>“Please visit our Contact page to request accessibility formats and communications supports.”</i> | Completed | April 30, 2024 |

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| | (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | | | |
| 2.2 Accessible formats & communication supports | <p>12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</p> <p style="padding-left: 40px;">(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p style="padding-left: 40px;">(b) at a cost that is no more than the regular cost charged to other persons.</p> <p>(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p> | Provisions under this requirement are outlined in the <u>IASR Policy</u> . DSF has developed and will maintain a list of accessible formats and communication supports. The list is posted on DSF's external website. | Completed | April 30, 2024 |
| 2.3 Accessible websites & web content | <p>14. (4) Large organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:</p> <p style="padding-left: 40px;">(a) By January 1, 2014, new internet websites and web content on</p> | This requirement does not apply to DSF. | n/a | April 30, 2024 |

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| | those sites must conform with WCAG 2.0 Level A. | | | |
| | <p>(b) By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded). <p>(5) Except where meeting the requirement is not practicable, this section applies,</p> <ul style="list-style-type: none"> (a) to websites and web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modification of the product; and (b) to web content published on a website after January 1, 2012. | | Commence in 2020 | April 30, 2024 |

| PART III – Employment Standards | | | | |
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| Initiative | IASR Requirement | Actions | Status | Compliance Deadline |
| 3.1 Recruitment, general | 22. Every employer shall notify its employees and the public about the availability of accommodation for | The following is posted on the Careers page of DSF's external website: | Completed | April 30, 2024 |

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| | applicants with disabilities in its recruitment processes. | <p><i>“Devry Smith Frank LLP is committed to providing a barrier-free environment for all job applicants and employees. Please advise us of any special accommodation needs during the recruitment process.”</i></p> <p>A similar note shall be incorporated into the content of external job postings.</p> | | |
| 3.2 Recruitment, assessment or selection process | <p>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.</p> <p>(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 applicant's accessibility needs due to disability.</p> | A similar note shall be incorporated into all communications with employment candidates during the recruitment, selection and hiring processes. | Completed | April 30, 2024 |
| 3.3 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. | DSF's <u>IASR</u> Policy is provided to successful job applicants with their offer of employment letter. | Completed | April 30, 2024 |
| 3.4 Informing employees of supports | 25. (1) Every employer shall inform its employees of its policies used to support its employees with disabilities, | DSF's <u>IASR</u> Policy is posted on DSF's intranet. | Completed | April 30, 2024 |

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| | including, but not limited to, policies on the provision of job accommodations that take into account 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. | DSF's <u>IASR</u> Policy is included in the New Hire folder provided to employees on their first day of work. | Completed | April 30, 2024 |
| | (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. | Updates to DSF's policies are posted on DSF's intranet. | Completed | April 30, 2024 |
| 3.5 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, <ul style="list-style-type: none"> (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace. | Upon request, DSF will provide or arrange for the provision of accessible formats and communication supports. | | April 30, 2024 |
| | (2) The employer shall consult with the employee making the request in | DSF will consult with the employee making the request to determine the | | April 30, 2024 |

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| | determining the suitability of an accessible format or communication support. | best way to provide the accessible format or communication support. | | |
| 3.6 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. | When required, DSF will create individualized workplace emergency response information for employees with disabilities. | | April 30, 2024 |
| | (2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. | DSF has developed <u>Individual Workplace Emergency Response Information Consent Form</u> for employees with disabilities. | Completed | April 30, 2024 |
| | (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. | As soon as practicable after becoming aware of the need for accommodation, HR will work with each individual requiring accommodation in order to prepare an individualized workplace emergency response plan for that employee. | | April 30, 2024 |
| | (4) Every employer shall review the individualized workplace emergency response information, | DSF's <u>IASR Policy</u> outlines review guidelines. | Completed | April 30, 2024 |

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| | <ul style="list-style-type: none"> (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. | | | |
| 3.7 Documented individual accommodation plans | <p>28. (1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside | DSF's <u>Individual Accommodation Plan Procedure</u> outlines the steps for developing an individualized accommodation plan for each employee with disabilities. | Completed | April 30, 2024 |

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| | <p>medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>4. 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.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> | | | |
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| | <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> | | | |
| | <p>(3) Individual accommodation plans shall,</p> <p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>(c) identify any other accommodation that is to be provided.</p> | | | |
| 3.8 Return to work process | 29. (1) Every employer, other than an employer that is a small organization, | DSF will implement an individualized return to work plan | | April 30, 2024 |

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| | <p>(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</p> <p>(b) shall document the process.</p> <p>(2) The return to work process shall,</p> <p>(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</p> <p>(b) use documented individual accommodation plans, as described in section 28, as part of the process.</p> <p>(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.</p> | <p>for each employee returning to work after an absence due to a disability.</p> | | |
| <p>3.9 Performance management</p> | <p>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</p> | <p>DSF will consider the accessibility needs of employees with disabilities when implementing performance management processes, offering career development or advancement</p> | | <p>April 30, 2024</p> |

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| | performance management process in respect of employees with disabilities. | opportunities, or redeployment within DSF. | |
| 3.10 Career development & advancement | 31. (1) An employer that provides career development and advancement to its employees shall take into account 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. | | April 30, 2024 |
| 3.11 Redeployment | 32. (1) 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. | | April 30, 2024 |

| Review and Update Schedule | | |
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| | Date: | Status: |
| Original Document Release | 1 January, 2015 | Completed |
| First Review and Update | 1 January, 2019 | Completed |
| Second Review and Update | 30 April, 2024 | Completed |
| Third Review and Update | 30 April 2029 | |

If you have any questions, or have feedback related to DSF's Multi-Year Accessibility Plan, please email info@devrylaw.ca or contact Mimi Stellino at 416 446 5814.



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April 30, 2024