

## AODA PLAN

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Effective July 1, 2021

(Last updated November 2, 2023)

### INTRODUCTION

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In accordance with Axsium Group's obligations under AODA (Accessibility for Ontarians with Disabilities Act (2005)) and IASR (Integrated Accessibility Standards Regulation {O.Reg.191/11, s.4 {1} {2}}, Axsium has implemented a plan that which contains deliverables, policies and procedures that will be put in place and followed over the next 5 years.

The Director of Human Resources of Axsium has been appointed as the AODA Coordinator and will oversee and monitor the plan implementation and will update the plan accordingly.

A copy of this plan can be found on Axsium's Internal HR SharePoint Site and at [www.axsiumgroup.com](http://www.axsiumgroup.com).

### Explanation of AODA

The goal of AODA is to make Ontario accessible by 2025 through the development of accessibility standards. Regulatory compliance under AODA will include:

- Public Transportation
- Access to print and website media
- Employment practices
- Access to building and outdoor spaces

### COMMITMENT STATEMENTS

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#### Customer Service Standard:

Axsium is committed to, and will make reasonable efforts to, provide customer service which is consistent with the following principles: dignity, independence, integration and equal opportunity. Policies, practices, and procedures developed by Axsium will address the requirements of the Customer Service Standard and will consider, as much as possible, both visible and invisible disabilities. Axsium will communicate its policies and procedures pertaining to its Customer Service Standard to persons with disabilities and will provide where possible accessible formats upon request. Employees responsible for developing policies and procedures, and for providing goods and services, will be trained on accessible customer service.

**Information and Communication Standard:**

Axsium will take steps to make publicly available information and its feedback process accessible upon request. Axsium Group conforms to the WCAG 2.0. Level Accessible emergency information will be made available in an accessible format upon request. Employees with disabilities will be provided with individualized emergency response information upon request. In the event of a service disruption, Axsium will notify clients and employees of the service disruption and alternatives available.

**Employment Standard:**

Axsium is committed to seeking out and retaining the finest human talent in order to ensure exceptional performance, customer service delivery and financial stability. Axsium believes in treating all people with respect and dignity and strives to provide an environment where employees are encouraged to reach their maximum potential, regardless of differences. We encompass differences in ethnicity, gender, language, age, sexual orientation, gender identity, religion, socio-economic status, physical and mental ability, cultural values, experiences and education.

Axsium is committed to fair and accessible employment practices and will notify potential candidates that we will accommodate people with disabilities during the recruitment, selection and assessment process. Human Resources will develop individual accommodation plans and return-to-work policies for employees that have been absent due to a short term and/or long-term disability.

We will ensure all employees and independent contractors have completed training on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities.

**Design of Public Spaces Standard:**

Axsium no longer operates out of a physical office space. However, if that were to change, Axsium will make reasonable efforts to meet the Accessibility Standard for Design of Public Spaces when building or making major modifications to public spaces up to the point of undue hardship and will endeavor to find alternative ways of providing goods and services to persons with disabilities.

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## **PART 1 CUSTOMER SERVICE STANDARDS – COMPLETE & IN COMPLIANCE**

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**Accessibility Standards for Customer Service, O Reg. 429/07**

The Customer Service Standards refer to how we as an organization are going to deliver services to clients with visible and/or invisible disabilities. It includes business practices, a feedback process, service disruptions, employee training, the

use of service animals and support persons. Axsium has completed all of the necessary "customer service" requirements outlined in AODA.

AODA Customer Service Standard	Compliance Date	Description, Action and Responsibility			Status
		Description	Action to be taken	Responsibility	
Establishment of Accessibility Policies	January 1, 2016	Written policy		Human Resources	Complete and to be reviewed and updated (if required) on an annual basis.
Provide Notice of Disruptive Service	January 1, 2016	Written policy		Human Resources	Complete and to be reviewed and updated (if required) on an annual basis.
Use of Service Dogs	January 1, 2016	Written policy		Human Resources	Complete and to be reviewed and updated (if required) on an annual basis.
Provide Disabled Parking	N/A	N/A	N/A	N/A	Axsium does not have physical office space.
Provide Effective Communication Vehicle for Feedback	January 1, 2016	Written policy		Human Resources	Complete and to be reviewed and updated (if required) on an annual basis.
Provide emergency information in an accessible format	January 1, 2016	Written Policy	Accessible formats of emergency information will be supplied upon request	Human Resources	Complete and to be reviewed and updated (if required) on an annual basis
Compliance Report	June 30, 2021	Complete report online		Human Resources	<i>Latest annual report submitted May 2023</i>

Commitment to Training	November 2012	Train all Ontario employees and IC on AODA and the Human Rights Code and how to assist people with disabilities accessing our services		Human Resources	Ongoing
Provide Various Aids	N/A	N/A	N/A	N/A	Axsiom does not have physical office space.

## PART 2 INFORMATION & COMMUNICATION STANDARDS

### Integrated Accessibility Standards, Reg. 191/117

The Information and Communications Standards include requirements related to accessible feedback processes as well as methods of communication to our clients, employees and independent contractors with a visible or invisible disability. The standards cover the feedback process and accessible formats, company communications and web content.

AODA Customer Service Standard	Compliance Date	Description, Action and Responsibility			Status
		Description	Action to be taken	Responsibility	
Feedback Process Section 11 of AODA	January 1, 2016	Written policy		Human Resources	Complete and to be reviewed and updated (if required) on an annual basis
Provide Accessible Formats	January 1, 2016	Written Policy - Accessible formats will be supplied upon request		Human Resources	Complete and to be reviewed and updated (if required) on an annual basis
Emergency Plan {S.13}	January 1, 2016	Emergency Plan to be available upon request. To include emergency procedure for those with disability.	Review current plan and update as required	Human Resources	Complete and to be reviewed and updated (if required) on an annual basis

Website Information	June 30, 2021	Statement that upon request can provide accessible formats and / or communication supports for persons with disabilities.		Marketing	Complete and to be reviewed and updated (if required) on an annual basis
Website Conformation	November 4, 2021	Website to conform to WCAG 2.0 World Wide Web Consortium Web Content as set out in the legislation.		IT & Marketing	Complete
Accessibility Plans	June 2021	Accessible formats of plans & information will be supplied upon request.		Human Resources	To be reviewed and updated on an annual basis.
Accessibility Statement	January 1, 2016	Written policy	Statement of commitment that Axsium is working toward meeting the accessibility needs of persons with disabilities in a timely manner.	Human Resources	Complete and to be reviewed and updated (if required) on an annual basis

### PART 3 EMPLOYMENT STANDARDS

Requirements under this section are requirements pertaining to recruitment, assessment and selection of employees. This includes workplace accessible formats and communication support for employees, workplace emergency response, and individual accommodation plans and return to work processes, performance management, career development and redeployment.

AODA Customer Service Standard	Compliance Date	Description, Action and Responsibility			Status
		Description	Action to be taken	Responsibility	
Review of existing policies	June 2021	Update current policies that notify its employees and the public about the availability of accommodation for applicants with disabilities as part of Axsium's recruitment process.	Notify applicants during the selection process that accommodations are available upon request. Once established Axsium to consult with the applicant in the provision of providing suitable accommodation based on the applicants needs due disability.	Human Resources	Ongoing
Communicate to Employees	November 2012	Train all current and new employees including volunteers on AODA standards. Provide training in accessible formats to be carried out on an annual basis during orientation.	Review and update training material and or purchase additional training items	Human Resources	Ongoing
Employee Accommodation	January 1, 2016	Employee requests disability accommodation. This could include: <i>Job descriptions</i> <i>Training Materials</i> <i>Individual Work Plan</i> <i>Return to Work program</i> <i>Methods of Communication</i>	Axsium will consult with the employee to provide suitable accessible workplace formats regarding communication of information needed to perform duties.	Human Resources All People Managers	Ongoing

Document Individual Accommodation	January 1,2016	Axsium documents individual accommodation plans for employees with disabilities		Human Resources	Ongoing
Return To Work Program	January 1, 2016	Axsium develops individual disability accommodations for employees who have been absent through disability	Management to monitor and review.	Human Resources	Ongoing
Provide emergency information in an accessible format	January 1, 2016	To provide workplace emergency response information for those employees with disabilities.	Review policy	Human Resources	Complete an to be reviewed and updated (if required) on an annual basis.
Performance Management	June 2021	Axsium will identify potential resources and assistive devices that enable people with disabilities to be more successful in their workplace environment as required.	.	Human Resources People Managers	Ongoing
Career Development and Advancement		Axsium is committed to the training and advancement of all employees. Axsium will take into account the individual needs of its employees with disabilities as well as individual accommodation plans.		Human Resources People Managers	Ongoing
Work Assignment		Axsium will take into account the accessibility needs		Human Resources	Ongoing

		of individual employee with disability			
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## PART 4 TRANSPORTATION STANDARD

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This does not apply to the Axsium at this time.

## PART 5 DESIGN OF PUBLIC SPACES STANDARDS

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This does not apply to Axsium as this time – we do not have physical office space.

## ACCESSIBILITY POLICY - OVERVIEW

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The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is a law that was passed by the Province of Ontario which allows the government to develop and enforce specific standards for accessibility. The standards are intended to achieve accessibility for people with disabilities in the areas of customer service, transportation, the built environment, information and communication, and employment.

Axsium Group Limited is committed to providing services in a way that respects the dignity and independence of people with disabilities in keeping with the spirit of the AODA and the Customer Service Regulation. Axsium strives to ensure that people with disabilities are able to receive accessible services.

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of services to the public or other third parties. This document is available to the public at [www.axsiumgroup.com](http://www.axsiumgroup.com) or on request by:

**Mail:** Human Resources  
10 Four Seasons Place  
Suite 1000  
Toronto, Ontario M9B 6H7

**Email:** [info@axsiumgroup.com](mailto:info@axsiumgroup.com)  
**Phone:** 416.849.5424



## **POLICY, PRACTICES AND PROCEDURES**

All services provided by Axsium (hereinafter referred as the Company) will follow the principles of dignity, independence, integration (except when alternate measures are necessary to meet the needs of people with disabilities) and equal opportunity.

Axsium also recognizes that people living with a disability may use alternative methods to access information or services and will strive to provide services in an alternative format upon request. An alternative format can be requested by completing an Alternative Format Request Form, a sample copy is attached to the back of this document. The forms are also available upon request to the address above. Upon receipt of Alternative Format Request, Axsium will provide the alternative format within a reasonable time frame which may vary based on the time needed to process the request and the complexity of the alternative service delivery process.

## SERVICE ANIMALS AND SUPPORT PERSONS

**Service animals** are animals which have been trained to assist people with different kinds of disabilities to overcome barriers. A few examples of service animals include dogs used by people who are visually impaired, hearing alert animals for people who are hearing impaired, and animals trained to alert an individual to an oncoming seizure and lead them to safety.

To be considered a service animal under the Customer Service Regulation, it must be either readily apparent (obvious by its appearance or by what it is doing) that the animal is being used because of a person's disability or the person with a disability must provide a letter from a physician or nurse confirming that the person requires the animal because of his or her disability.

Axsium currently does not work from a physical office space. However, if this were to change, Axsium will permit any person with a disability to enter its publicly accessible premises with a service animal and to keep the animal with him or her, unless the animal is otherwise excluded by law.

**A support person** is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services. Personal care needs may include, but are not limited to, physically transferring an individual from one location to another or assisting an individual with using the restroom. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure. A support person may be a paid professional, a volunteer, a

family member or a friend of the person with a disability. He or she does not necessarily need to have special training or qualifications.

Axsium currently does not work from a physical office space. However, if that were to change, Axsium will permit a person with a disability to be accompanied by a support person to enter its premises together. In some cases, the support person may have to agree to rules or requirements that are specific to Axsium's services. Axsium may require that a person with a disability access its services with the participation of a support person where accessing the services without a support person would pose a significant risk to the health and safety of the person with a disability.

#### NOTICE OF DISRUPTION IN SERVICES

People with disabilities may rely on certain services or systems to access Axsium's services. It is possible that from time to time there will be disruptions in service or technology that is temporarily unavailable.

Axsium will endeavour to notify service users of disruptions to technologies or methods where the disruption is likely to affect the ability of a person with disabilities to access services. Axsium recognizes that providing advanced notice of these types of disruptions will assist people with disabilities by limiting unnecessary trips or attempts to access services.

If a disruption in service is planned and expected, Axsium will endeavour to provide service users with reasonable notice. Where a disruption to service is unexpected, Axsium will provide notice of a disruption as soon as possible.

The Notice of Disruption will include the following information:

- Type of disruption
- Reason for disruption
- Anticipated duration of disruption
- Description of alternate services, if any
- Contact information

In the event of a disruption to Axsium services, the Notice of Disruption will be posed on-line at [www.axsiumgroup.com](http://www.axsiumgroup.com).

#### TRAINING

Axsium will provide training to all employees in Ontario who have a client facing or policy-development role to increase awareness and encourage respect for the core principles of independence, equality, dignity, integration and equality of opportunity for people with disabilities.

Axsium employees will be required to complete an interactive on-line training program which will address topics including:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service;
- How to interact and communicate with people with various types of disabilities;
- The purpose of assistive devices and how to interact and communicate with people who use them;

- The purpose of service animals and how to interact with people who use them;
- The purpose of support persons and how to interact with people who are accompanied by a support person; and
- What to do if a person with a disability is having difficulty in accessing Axsium’s services
- Axsium employees will also be required to read Axsium’s Policies, Practices and Procedures for Accessible Customer Service document in addition to any other internal documents on accessibility at Axsium.

Axsium will keep a record of all training provided under the Accessibility for Ontarians with Disabilities Act and the Customer Service Regulation.

**CLIENT FEEDBACK**

Axsium aims to meet service expectations for all of our clients including those living with a disability. Axsium welcomes any feedback as we will use the information to learn and improve. As we recognize that people may use different methods to communicate their feedback. Anyone who wish to provide feedback on the way Axsium Group provides services to people with disabilities can do so in a variety of formats including:

**By mail to:** Human Resources  
10 Four Seasons Place  
Suite 1000  
Toronto, Ontario M6K 3E3

**Email to:** info@axsiumgroup.com  
**Phone:** 416.849.5424

If the Feedback Form indicates the client wishes to be contacted Axsium will respond either in writing, by e-mail or by telephone acknowledging the receipt of the feedback and outlining the outcome, if any, from the feedback. Axsium will endeavor to respond in a format that is accessible to the client, taking into account his or her individual needs.

**Sample – CLIENT FEEDBACK FORM**

Date of event:	
Feedback concerning event:	
Personnel involved:	

Additional comments:	
Feedback submission date:	

**Optional Information (only required if you wish to be contacted)**

Name:	
Address:	
Phone Number(s):	
Email	
Preferred method of communication:	

**Sample - ALTERNATIVE FORMAT REQUEST FORM**

Axsiom strives to make its services available to those who may need to access those services through alternative means, including through the use of documents in alternative formats. To receive an Axsiom document or service in an alternative format, please fill in the information below. Axsiom will strive to provide the document or service requested within a reasonable time frame based on the resources required to process the request and the complexity of the alternative service delivery process.

Name of Requester:	
Address:	
Telephone Number:	
Email:	

Document or Services Requested:	
Preferred Formats:	
Date Requested:	

**By mail to:** Human Resources  
10 Four Seasons Place  
Suite 1000  
Toronto, Ontario M9B 6H7

**Email to:** info@axsiumgroup.com  
**Phone:** 416.849.5424

**Sample – NOTICE OF DISRUPTION TO SERVICES**

Axsium recognizes that providing advanced notice of disruption to its services will assist its customers by limiting unnecessary attempts to access services.

Type of disruptions:	
Reason for disruption:	
Anticipated duration of disruption:	
Description of alternative services, if any:	

Please direct any disruption- related inquires by:

**By mail to:** Human Resources  
10 Four Seasons Place  
Suite 1000  
Toronto, Ontario M9B 6H7

**Email to:** info@axsiumgroup.com  
**Phone:** 416.849.5424