

AODA PLAN

(Effective July 1, 2021)

INTRODUCTION

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.

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

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. When developing a new website and its content, **Axsium Group will conform to the WCAG 2.0. Level A** 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 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.

PART 1 CUSTOMER SERVICE STANDARDS – COMPLETE & IN COMPLIANCE

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

The Customer Service Standards refer to how we as an organization are going to deliver service 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			Our landlord does not offer disabled parking.	TCF	Reliant on landlord for completion
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>In progress</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.	Review – when return to office 2021	Axsium to provide and or make available various aids upon request	To Be Available at reception	Human Resources	New Items to be Purchased when office reopens

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	TBD	Website to conform to WCAG 2.0 World Wide Web Consortium Web Content as set out in the legislation.		IT & Marketing	In progress – estimated completion September 30, 2021
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	Review and update training material and or purchase additional training items	Human Resources	Ongoing

		an annual basis during orientation.			
Employee Accommodation	January 1, 2016	Employee requests disability accommodation. This could include: Job descriptions <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	Review policy	Human Resources	Complete an to be reviewed and updated (if

		those employees with disabilities.			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 of individual employee with disability		Human Resources	Ongoing

PART 4 TRANSPORTATION STANDARD

This does not apply to the Axsium at this time.

PART 5 DESIGN OF PUBLIC SPACES STANDARDS

{Under this section Axsium has until 2025 to address physical barriers as long as it does not cause hardship for the company}

AODA Customer Service Standard	Compliance Date	Description, Action and Responsibility			Status
		Description	Action to be taken	Responsibility	
Accessibility Entrances & Exits & elevator from 1 st Floor. Washroom Accessibility and Disable Parking	January 2016 – except for disabled parking			TCF	TCF Building is accessible. All TCF bathrooms are accessible. TCF does not provide designated disabled parking
Future changes		Assess any future changes to comply with accessibility requirements			No future changes planned at this time.

ACCESSIBILITY POLICY - OVERVIEW

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 or on request by:

Mail: Human Resources

77 Mowat Ave, Suite 400

Toronto, Ontario M6K 3E3

Email: 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.

ASSISTIVE DEVICES AND ALTERNATIVE FORMATS

Individuals to whom Axsium provides services may need to do so with the use of assistive devices, such as communication aids, cognition aids, personal mobility aids and medical aids. These assistive devices may include hearing aids, manual or motorized wheelchairs, Oxygen tanks, canes, crutches and walkers, electronic communications devices, magnifiers etc. Axsium strives to enable people with the same quality of service as all other customers. Axsium's Ontario office includes the following assistive devices – Automatic door openers, elevators, ramp and handicap bathrooms. If the Axsium office presents a barrier to an individual, we seek to make arrangements to meet the individual in an alternative manner.

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 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.

If a person with a disability is accompanied by a support person, Axsium will permit both persons to enter its premise 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 facilities, services or systems to access Axsium's services. It is possible that from time to time there will be disruptions in service such as an elevator under repair, renovations that limit access to a publicly-accessible area, or technology that is temporarily unavailable.

Axsium will endeavour to notify service users of disruptions to locations, 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 facilities or 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 and /or at the publically accessible entrance to the premises.

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
77 Mowat Ave, Suite 400
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

Axsium 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 Axsium document or service in an alternative format, please fill in the information below. Axsium 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
77 Mowat Ave, Suite 400
Toronto, Ontario M6K 3E3

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 trips or attempts to access services.

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

Please direct any disruption- related inquires by:

By mail to: Human Resources
77 Mowat Ave, Suite 400
Toronto, Ontario M6K 3E3

Email to: info@axsiumgroup.com
Phone: 416.849.5424