



ACCESSIBILITY STANDARDS

MULTI YEAR PLAN

Version 1.5

Last Updated: 13/12/2016

Overview

IMKT Direct Solutions Corporation (iMarketing) is committed to meeting the objectives and requirements outlined in the Accessibility for Ontarians with Disabilities Act, 2005 and the applicable regulations, and to meeting the accessibility needs of persons with disabilities in a timely manner, through the implementation of the requirements of the Act and its applicable regulations. This Plan applies to all divisions of iMarketing.

Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”)

The AODA develops, implements, and enforces accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures, and premises are accessible to persons with disabilities. The AODA intends to achieve an accessible Ontario by Jan 1, 2025. To do so, mandatory and enforceable standards have been implemented.

The Standards include:

Customer Service Standard – Ontario Regulation 429/07

The Customer Service Standard (Ontario Regulation 429/07) was the first standard under the AODA to become law. It ensures that people with disabilities can receive goods and services in a manner that takes into account one’s disability.

Requirements include development of a policy, practices, procedures as well as the provision of training for staff and volunteers.

iMarketing submitted compliance reports to the Province indicating we had addressed the requirements of the Regulation and were meeting the compliance obligation. We will continue to ensure compliance with the Customer Service Standard.

We developed feedback processes to respond to inquiries and suggestions received by phone, email, mail, in person. This has been communicated to internal and external stakeholders.

Integrated Accessibility Standard Regulation (IASR) – Ontario Regulation 191/11

The IASR brings together the following standard areas in one Regulation: Information and Communication, Employment, Built Environment and Transportation. The Transportation Standard does not apply to us. General requirements common to all standard areas include policy development and training (on the requirements of the IASR and the Ontario Human Rights Code). Our Company does not currently use self-service kiosks.

The requirements have staggered compliance dates up to the year 2021.

IMKT Direct Solutions Integrated Accessibility Standards Policy and Multi-Year Accessibility Plan – Development Process

Our team reviewed the requirements of the IASR. An IASR Policy was drafted to address how iMarketing achieves or will achieve accessibility through meeting the IASR’s requirements. The Multi Year

Accessibility Plan was developed in accordance with the IASR. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA.

Multi-Year Accessibility Plan

<u>Action</u>		<u>Compliance Date</u>	<u>Responsibly</u>	<u>Status</u>
Develop and implement Integrated Accessibility Standards Policy	<ul style="list-style-type: none"> • Make the Policy publicly available and provide in an accessible format, upon request. • Review & update as required 	Jan 1, 2014	HR	Completed
Develop a multi-year accessibility plan	<ul style="list-style-type: none"> • Post multi-year accessibility plan on intranet and provide in an accessible format, upon request. • Review and update the plan at least once every five years. 	Jan 1, 2014	HR	Completed
Training	<ul style="list-style-type: none"> • Implement training on IASR and the Human Rights Code as it pertains to persons with disabilities to employees. • Update training as required. • Keep a record of the dates of training and the individuals who received the training. 	Jan 1, 2015	Director of Recruiting & Training	Completed/ On-going
Feedback processes	<ul style="list-style-type: none"> • Processes for receiving and responding to feedback are accessible and meet the requirements of the IASR. 	Jan 1, 2015	HR	Completed
Accessible formats and communication supports	<ul style="list-style-type: none"> • Upon request, to the extent practicable, provide for provision of accessible formats and communication supports for persons with disabilities. • Consult with person making the request to determine suitability of accessible format or communication support. • Put a statement on the website that we shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities at a cost no more than regular cost charged to other persons. 	Jan 1, 2016	HR/New Media	Completed
Emergency procedures, plans or public safety information	<ul style="list-style-type: none"> • Emergency procedures, plans or public safety information, that is publicly available, shall be provided in an accessible format or with appropriate communication supports, upon request as soon as practicable. 	Jan 1, 2012	HR	Completed
Accessible websites	<ul style="list-style-type: none"> • Websites and web content published after 2012 to conform to 	Jan 1, 2014 –	New Media	In Progress

and web content	<p>WCAG 2.0 Level A initially and increasing to WCAG 2.0 Level AA by Jan 1, 2021 to the extent practicable other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions).</p> <ul style="list-style-type: none"> Note – All WCAG2.0 requirements only apply to websites, web content and web based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible. 	<p>January 1, 2021</p>		
Recruitment, Assessment, Selection	<ul style="list-style-type: none"> Review and update existing recruitment, policies, procedures and processes. Specify that accommodation is available for applicants with disabilities on the website and on job postings. Inform applicants about the availability of accommodations: when called for an interview, during the selection process, at the time of the job offer and as soon as practicable after the new employee begins – specifically at orientation. If selected applicant requests accommodation, consult with the applicant and arrange for provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability. 	<p>Jan 1, 2016</p>	<p>HR & Director of R&T</p>	<p>Completed</p>
Informing employees of supports	<ul style="list-style-type: none"> Inform current employees and new hires as soon as practicable after they begin employment of policies supporting employees with disabilities. Keep employees up to date on changes to policies/procedures relating to accommodation. 	<p>Jan 1, 2016</p>	<p>HR & Director of R&T</p>	<p>Completed</p>
Accessible formats and communication supports for employees	<ul style="list-style-type: none"> When requested by an employee with a disability, employers shall consult with the employee and provide or arrange for the provision of suitable accessible formats and communication supports needed to perform the employee's job. 	<p>Jan 1, 2016</p>	<p>HR & Director of R&T</p>	<p>Completed</p>
Workplace emergency response information	<ul style="list-style-type: none"> Individualized workplace emergency response information procedures have been developed for employees with disabilities. 	<p>Jan 1, 2012</p>	<p>HR</p>	<p>Completed</p>
Documented individual accommodation plans / Return to work	<ul style="list-style-type: none"> Create a written process for the development of documented individual accommodation plans and return to work plans for employees 	<p>Jan 1, 2016</p>	<p>HR & Director of R&T</p>	<p>Completed</p>

Process	<ul style="list-style-type: none"> with disabilities. • Include in the process and plans all of the required elements in accordance with the provisions of the IASR. 			
Performance management, career development, advancement and redeployment	<ul style="list-style-type: none"> • Review and update existing policies, practices to ensure compliance with IASR • Take the accessibility needs of employees with disabilities and, as applicable, individual accommodation plans, into account as part of performance management processes, when assessing performance, providing career development & advancement opportunities and considering redeployment. 	Jan 1, 2016	HR & Director of R&T	Completed
Design of Public Spaces Standards	<ul style="list-style-type: none"> • Ensure that all third party landlords are meeting AODA requirements 	Jan 1, 2017	Management	
Maintain the accessible parts of our public spaces.	<ul style="list-style-type: none"> • Identify preventative and emergency maintenance procedures & alternatives & procedures for handling disruptions and alternatives in accordance with the provisions of the IASR 	Jan 1, 2017	Management	

Reporting Dates for IMKT Direct Solutions

1. Customer Service Standard – Dec 31, 2014 (requirement to report annually)
2. IASR – Dec 31, 2014 (requirement to report annually)

Next Steps

- Recruit Accessibility Committee Members impacted by IASR legislation
- Monitor and review accessibility procedures and update as required

Feedback

Email: HRDept@imkcp.com

Phone: 1-800-210-8579 Ext 555

Fax: (416) 921-2373

IMKT Direct Solutions
 90 Eglinton Ave West
 Suite 300
 Toronto, Ontario M4R2E4
 Attention: Human Resources