

## **AODA – Integrated Accessibility Standards Regulation (IASR) – Accessibility Policies**

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The policies in this document are intended to meet the requirements of the Integrated Accessibility Standards Regulations (“IASR”) for Customer Service Standards, Information and Communication Standards, Employment Standards and Design of Public Spaces Standards set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*.

### **Statement of Commitment to Accessibility**

Polar Asset Management Partners Inc. (“Polar”) is committed to providing an accommodating and inclusive environment for all individuals including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations.

Polar understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, training, and best practices to enhance accessibility to persons with disabilities.

### **General Requirements**

General requirements that apply across all of the standards and related policies (information and communication, employment, design of public spaces, and customer service) are outlined as follows.

#### Establishment of Accessibility Policies and Plans

Polar will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

#### Training Requirements

Polar will provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Polar’s policies, and all other persons who provide goods, services or facilities on behalf of Polar.

Training will be provided as soon as is reasonably practicable, but no later than (Insert Compliance Deadline). Training will be provided on an ongoing basis to new employees and as changes to Polar’s accessibility policies occur.

#### Records

Polar will maintain records on the training provided, when it was provided and the number of employees that were trained.

#### Review

These policies will be reviewed regularly to ensure that they are reflective of Polar’s current practices and legislative requirements.

## Accessible Customer Service Policy

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### Definitions

*Assistive Device* – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that clients bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

*Disability* – The term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

*Guide Dog* – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety and increased independence for people who are blind.

*Service Animal* – an animal is a service animal for a person with a disability if:

1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
  - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
  - A member of the College of Chiropractors of Ontario;
  - A member of the College of Nurses of Ontario;
  - A member of the College of Occupational Therapists of Ontario;
  - A member of the College of Optometrists of Ontario;
  - A member of the College of Physicians and Surgeons of Ontario;
  - A member of the College of Physiotherapists of Ontario;
  - A member of the College of Psychologists of Ontario; or
  - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

*Service Dog* – As reflected in Health Protection and Promotion Act, Ontario Regulation 562 a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

*Support Person* – a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

## **Guidelines**

In accordance with the Customer Service Standards, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Client Feedback
- G. Notice of Availability and Format of Required Documents

### **A. The Provision of Goods and Services to Persons with Disabilities**

Polar will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all clients receive the same value and quality;
- Allowing clients with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that clients with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the client's disability.

### **B. The Use of Assistive Devices**

#### Client's Own Assistive Device(s)

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Polar.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a client with an oxygen tank may involve ensuring the client is in a location that would be considered safe for both the client and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the client.

### **C. Guide Dogs, Service Animals and Service Dogs**

A client with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law.

#### Exclusion Guidelines

If a guide dog, service animal or service dog is excluded by law Polar will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

#### Recognizing a Guide Dog, Service Dog and/or Service Animal

If it is not readily apparent that the animal is being used by the client for reasons relating to his or her disability, Polar may request verification from the client.

#### Care and Control of the Animal

The client who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

#### Allergies

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Polar will make all reasonable efforts to meet the needs of all individuals.

### **D. The Use of Support Persons**

If a client with a disability is accompanied by a support person, Polar will ensure that both persons are allowed to enter the premises together and that the client is not prevented from having access to the support person. In situations where confidential information might be discussed, consent will be obtained from the client, prior to any conversation where confidential information might be discussed.

### **E. Notice of Disruptions in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Polar. In the event of any temporary disruptions to facilities or services that clients with disabilities rely on to access or use Polar's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

When disruptions occur Polar will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Polar website;
- contacting clients with appointments;
- verbally notifying clients when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

## **F. Client Feedback**

Polar provides clients with the opportunity to provide feedback on the services provided to clients with disabilities. Information about the feedback process will be readily available to all clients and notice of the process will be made available by posting it on Polar's website. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

### Submitting Feedback

Clients can submit feedback to:

Jennifer Schwartz  
401 Bay Street, Suite 1900  
P.O. Box 19  
Toronto, ON M5H 2Y4  
416-369-8576  
jschwartz@polaramp.com

Clients who wish to provide feedback can access the Client Feedback form on Polar's website or complete an onsite client feedback form at Polar's office.

All feedback will be directed to Polar's Legal & Compliance department. Clients who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

## **G. Notice of Availability and Format of Documents**

Polar will notify clients that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the client's disability. Notification will be given by posting the information on Polar's website and/or any other reasonable method.

### **Administration**

If you have any questions or concerns about this policy or its related procedures please contact Jennifer Schwartz, 401 Bay Street, Suite 1900, P.O. Box 19, Toronto, ON M5H 2Y4, 416-369-8576, jschwartz@polaramp.com

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.

# Accessible Information and Communications Policy

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## Intent

This policy applies to the provision of information and communications services and materials for people with disabilities. All information and communications materials and services provided by Polar Asset Management Partners Inc. (“Polar”) shall follow the principles of dignity, independence, integration and equal opportunity.

## Definitions

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communications – means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready– An electronic or digital format that facilitates conversion into an acceptable format.

## General Principles

This policy addresses the following:

- A. Feedback Process
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- D. Exceptions

### A. Feedback Process

In accordance with the customer service standards, Polar will make known the availability of accessible feedback formats.

### B. Accessible Formats and Communication Supports

Unless deemed unconvertible Polar will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

Polar will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Polar will make the availability of accessible formats and communication supports publicly known.

### C. Accessible Websites and Web Content

Polar will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.

## **D. Exceptions**

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

### Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Polar will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Polar will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

## **Accessible Employment Policy**

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### **Intent**

This policy applies to the provision of accessible employment services for persons with disabilities. All employment services provided by Polar Asset Management Partners Inc. (“Polar”) shall follow the principles of dignity, independence, integration and equal opportunity.

### **Definitions**

*Accessible Formats*– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

*Communication Supports* – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

*Performance Management* – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

*Redeployment* – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

### **General Principles**

This Policy addresses the following:

- A. Recruitment, Assessment and Selection
- B. Accessible Formats and Communication Supports for Employees
- C. Workplace Emergency Response Information
- D. Documented Individual Accommodation Plans
- E. Performance Management and Career Development and Advancement
- F. Return to Work
- G. Redeployment

## **A. Recruitment, Assessment and Selection**

Polar will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Polar will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Polar's policies and supports for accommodating people with disabilities.

## **B. Accessible Formats and Communication Supports for Employees**

Polar will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Polar will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Polar will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

## **C. Workplace Emergency Response Information**

Where required, Polar will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Polar reviews general emergency response policies.

## **D. Documented Individual Accommodation Plans**

Polar has in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;



- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:

- Include information regarding accessible formats and communication supports upon request;
- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

#### **E. Performance Management and Career Development and Advancement**

Polar will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

*Individual accommodation plans will be consulted, as required.*

#### **F. Return to Work**

Polar will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Polar will take to facilitate the employee's return to work and shall use documented individual accommodation plans.

#### **G. Redeployment**

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

*Individual accommodation plans will be consulted, as required.*

#### **Accessible Design of Public Spaces**

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Polar will meet the accessibility standards by relying on the building's external management services to address any and all public spaces.