

AODA Integrated Accessibility Standards Policy and Multi-Year Accessibility Plan

Purpose

Dilawri Group of Companies is committed to working towards full compliance with current standards of the Integrated Accessibility Standards Regulation (IASR) Policy, Regulation 191/11, under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA); In doing so, we affirm our commitment to providing quality services in a manner that respects the dignity and independence of persons with disabilities.

All goods and services provided by Dilawri Group of Companies will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation* under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

Statement of the Commitment

Dilawri Group of Companies is committed to treating all employees, customers, and members of the public in a manner that respects dignity, independence, integration, and equal opportunity. We believe in inclusion and are committed to meeting the needs of people with disabilities in a timely manner by identifying, preventing, and removing barriers to accessibility and by meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and the *Integrated Accessibility Standards Regulation* (IASR).

Dilawri Group of Companies is committed to developing, implementing, maintaining, and reviewing policies that govern how the organization achieves accessibility. To support this commitment, Dilawri Group of Companies has established, documented, and maintained a Multi-Year Accessibility Plan that outlines our strategy to prevent and remove barriers and improve opportunities for people with disabilities.

The Multi-Year Accessibility Plan is reviewed and updated at least once every five years and is available on the Dilawri Group of Companies website and HR4. Accessible formats of the plan will be provided upon request.

Multi-Year Accessibility Plan

The AODA Multi-Year Accessibility Plan outlines the policies, achievements, and actions that Dilawri Group of Companies and its dealerships have taken and continue to undertake to improve accessibility for people with disabilities.

The current Multi-Year Accessibility Plan covers the period **2022–2027** and aligns with the organization's strategic objectives. The plan is reviewed and updated at least once every five years and is made available to the public in accessible formats upon request.

Assistive device: 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 customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

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*.

Standards of Accessibility under AODA:

General Standard

- Accessible Emergency Information

Dilawri Group of Companies is committed to providing clients with publicly available emergency information, plans or public safety information in an accessible way upon request. This information will also be available to the public.

Dilawri Group of Companies has provided and will continue to provide employees with disabilities with individualized emergency response information when necessary, and as soon as practically possible. If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent the workplace emergency response information will be given to the designated employee. Dilawri Group of Companies has created a process for documenting issues of accessibility and recording and providing accommodation for individualized accessible emergency response information. Dilawri Group of Companies will continue to review the individualized workplace emergency response plans when necessary i.e. the location of the employee changes and/or there is a change in disability.

- Accessibility policies and plans

Dilawri Group of Companies has developed, implemented, and maintained a multi-year plan that outlines strategies and actions to identify, prevent and remove barriers for people with disabilities.

- The IASR is incorporated into Dilawri Group of Companies' Code of Business Conduct. Our policy requires that the Code of Business Conduct must be read, reviewed, and signed by every employee upon hire, and as part of the annual performance review process for all employees.
 - Policy Review takes place within the organization and its subsidiaries annually.
 - Dilawri Group of Companies will file Accessibility Compliance Reports with the Province of Ontario in accordance with legislative requirements and prescribed reporting deadlines.
- Accessible Procurement

- Dilawri Group of Companies will incorporate accessibility criteria and features when procuring or acquiring goods, services, facilities, self-service kiosks, and technology, except where it is not practicable to do so. Where accessibility criteria cannot be incorporated, Dilawri Group of Companies will provide an explanation upon request.

- Training

Accessibility and inclusion of people with disabilities is a core value for Dilawri Group of Companies and for that reason, Dilawri Group of Companies provides training to employees and volunteers on Accessibility Standards and on the Human Rights Code as it relates to people with disabilities. Training is provided in a way that best suits the duties and needs of employees and volunteers and every person who deals with the public on behalf of Dilawri Group of Companies. In addition, employees may require training on one or more of the standards—information and communications, employment, or transportation, as it relates to the duties and responsibilities of their position.

Dilawri Group of Companies has taken the following steps to ensure employees are provided with the training needed to meet current standards and legislation:

- Provide educational or training resources in an accessible format that considers the accessibility needs of a person with a disability.
- Ensure new employees and volunteers complete training within 30 days of employment or placement.
- Keep and maintain a database of the training participant's names and dates of completion.

Customer Service Standard

Dilawri Group of Companies and its subsidiaries use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Goods or services are provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of goods or services to persons with disabilities, and others, is integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
- Persons with disabilities are given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.
- Persons with disabilities may use assistive devices and/or support persons in the access of goods and services.
- Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law.
- Dilawri Group of Companies employees, when communicating with a person with a disability, will do so in a manner that takes into account the person's disability.

The following measures have been implemented by Dilawri Group of Companies and its subsidiaries:

- Senior management has assigned HR and Health and Safety department to present and/or revise as required practices and procedures.
- The Accessible Customer Service Policy was published on our HR4.

- Notice will be provided on the website, over the phone, or in writing where applicable, and in accordance with the Business Recovery Plan when a Service Disruption occurs and will be done as quickly as possible if the disruption is unexpected.
- Training on “Creating a Respectful Workplace” and “AODA- IASR” are offered to all employees online. Both trainings address areas with regard to how to better interact with, and/or accommodate people with disabilities. Employees will gain understanding of their responsibilities in creating an inclusive and accessible environment, accepting and respectful of the differences between people. These are highly interactive courses that combine information, group and individual learning activities that will allow training participants to apply learned concepts to a variety of workplace scenarios.
- Online courses on “HR4” are available to all employees. Free access to this online course is available on Dilawri Group of Companies HR4 website.
- Completion of training of all employees is tracked and recorded on HR4.
- Comments relating to our programs and services with regard to customer service are welcomed and appreciated. A process has been established to encourage feedback regarding the way Dilawri Group of Companies provides goods and services to people with disabilities.

Feedback Process

Submitting Feedback

Dilawri Group of Companies welcomes and appreciates feedback regarding the accessibility of our services, facilities, programs, and customer service practices.

Feedback may be submitted in the following ways:

Sarina Marsala- Human Resource Manager
5500 Dixie Rd., Unit G, Mississauga, L4W 4N3
smarsala@dilawri.ca

Or

Ravi Kabrawala- Regional Health and Safety Coordinator
5500 Dixie Rd., Unit G, Mississauga, L4W 4N3
rkabrawala@dilawri.ca

Customers may provide feedback:

- In writing
- By email
- By telephone
- In person at any dealership location

Dilawri Group of Companies will make reasonable efforts to respond to feedback in a timely manner. Accessible formats and communication supports will be provided upon request.

Information and Communications Standard

Dilawri Group of Companies is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs. We want to achieve the most effective and efficient access to information for all users. Dilawri Group of Companies has undertaken the following plans to ensure compliance with this standard:

- A feedback process has been established that is accessible, alternate formats are also available such as telephone, mail and in-person. These processes have been communicated to the public and are available on our website.
- Our website has been designed to be user friendly for people with a range of needs. People are encouraged to download this free browser and evaluate it against their needs and contact Dilawri Group of Companies via email or phone if they require additional information.
- Our website also provides a feature that allows users to change the size of text they see online to suit their preference.

Dilawri Group of Companies is committed to ensuring that its public websites and web content conform to the requirements of the Accessibility for Ontarians with Disabilities Act and the Integrated Accessibility Standards Regulation. Public-facing websites and web content under the organization's control will meet the requirements of the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, except where exemptions permitted under the legislation apply.

In accordance with the IASR, Dilawri Group of Companies has reviewed and converted existing emergency & public safety information into a format that makes it available in accessible formats on request and in a timely manner.

Employment Standard:

Dilawri Group of Companies is committed to inclusive and accessible employment practices that attract and retain individuals with disabilities. We have taken the following steps to notify the public and employees that, when requested, Dilawri Group of Companies will accommodate people with disabilities throughout the recruitment and onboarding process.

Recruitment

Dilawri Group of Companies is committed to ensure that our recruitment and assessment processes are fair and accessible.

Dilawri Group of Companies has taken the following steps to ensure compliance with this standard:

- Specify that accommodation is available for applicants with disabilities in recruitment material, and with regards to interviews and assessments
- When making offers of employment, notify successful applicants of policies for accommodating employees with disabilities
- Inform employees of policies supporting employees with disabilities. Provide this information to new employees as soon as practicable after hiring
- Provide updated information on accommodations policies to employees when changes occur.
- Consult with employees to determine suitability of format or support.

Documented Individual Accommodation Plans

Dilawri Group of Companies is committed to producing and providing documented individual accommodation that includes the following:

- Participation of the employee requiring the individual accommodation plan.
- Ability to request outside medical evaluation to determine if accommodation can be achieved and how.
- High level of privacy.
- Regular review and updates.
- Reason for denial if applicable.
- The means of providing Individual Accommodation Plans in a format that takes into account the needs of the employee.
- And if required, include individualized workplace emergency response information.

Return to Work

Dilawri Group of Companies is committed to developing and putting in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.

Dilawri Group of Companies has developed and maintained a return-to-work process for our employees who have been absent from work due to a disability and require disability-related accommodation to return to work.

The process includes steps Dilawri Group of Companies takes to facilitate the return-to-work process & uses the documented individual accommodation plans.

Performance Management, Career Development & Redeployment

Dilawri Group of Companies is committed to ensuring the accessibility needs of employees with disabilities, as well as any documented accommodation plans, are considered in performance management, career development, advancement, and redeployment processes. Dilawri Group of Companies has reviewed and updated the Human Resources policies and procedures to include the following elements:

- Accessibility needs of employees with disabilities, as well as individual accommodation plans are considered when using performance management processes
- Accessibility needs of employees with disabilities, as well as individual accommodation plans are considered when providing career development and advancement opportunities.

Transportation Standard

Dilawri Group of Companies is committed to maintaining policies, planning for accessibility, and training staff to comply with the accessibility standards related to the Transportation Standards outlined in the Accessibility for Ontarians with Disabilities Act. All staff that are involved in transporting people – either for free or for a fee, will complete the Accessibility Standards online course that includes Transportation Standard module. Records are kept of the training provided. These commitments will be available in accessible formats upon request.

Design of Public Spaces

Dilawri Group of Companies will establish plans to meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.

Dilawri Group of Companies will take appropriate measures to prevent service disruptions to its accessible parts of its public spaces. In the event of service disruption, we will notify the public of the service disruptions and alternatives available.