

MULTI-YEAR ACCESSIBILITY PLAN

Introduction and Statement of Commitment

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act* (the “AODA”). The AODA requires that effective January 1, 2014, TopHatMoncole Corp (“Top Hat”) shall establish, implement, maintain and document a multi-year accessibility plan which outlines Top Hat’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements of the Integrated Accessibility Standards (the “IAS”).

Top Hat is committed to fulfilling our requirements under the AODA. This multi-year accessibility plan (the “Accessibility Plan”) outlines Top Hat’s strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS in order that Top Hat may fulfill its commitment as outlined in Top Hat’s Integrated Accessibility Standards Policy for Ontario, Canada (the “Policy”).

General Accessibility Standards

| Requirement | Responsible Individual/Department |
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| <p>Accessibility Policy</p> <p>Develop, implement and maintain policies governing how Top Hat achieves or will achieve accessibility through meeting the requirements of the IAS.</p> <p>Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.</p> <p>Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.</p> | HR |
| <p>Multi-Year Accessibility Plan</p> <p>Establish, implement, maintain and document a multi-year accessibility plan, which outlines Top Hat’s strategy to prevent and remove barriers and meet its requirements under this Regulation</p> <p>Post the accessibility plan on the website and provide the plan in an accessible format upon request.</p> <p>Review and update the accessibility plan at least once every five years.</p> | HR |
| <p>Training</p> <p>Provide training to all existing employees, volunteers and all</p> | HR |

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| <p>persons who participate in the development of <i>AODA</i> Policies.</p> <p>Training must include:</p> <ul style="list-style-type: none"> i. the requirements of the IAS; the <i>Human Rights Code</i> as it pertains to persons with disabilities; and ii. the <i>AODA</i> Policies as required by the IAS. <p>Keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.</p> <p>Ensure that contractors providing goods, services and/or facilities on its behalf have received the training required under the IAS.</p> | |
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Information and Communication Standards

| Requirement | Responsible Individual/Department |
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| <p>Emergency Plans, Procedures or Public Safety Information</p> <p>Provide any emergency plans, procedures or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request.</p> | HR |
| <p>Feedback</p> <p>Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.</p> <p>Notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures</p> | HR |
| <p>Accessible Formats and Communication Supports</p> <p>Upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.</p> <p>Provide Accessible Formats and Communication Supports in a timely manner at a cost that is no more than the regular cost</p> | HR/Marketing/Product |

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| <p>charged to other persons and in a manner that takes account the person's accessibility needs due to disability.</p> <p>Consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and notify the public of the availability of same.</p> | |
| <p>Accessible Websites and Web Content</p> <p>Ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.</p> <p>By January 1, 2021 ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.</p> | Marketing/Product |

Employment Standards

| Requirement | Responsible Individual/Department |
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| <p>Recruitment</p> <p>Notify the public and employees about the availability of accommodation for applicants with disabilities in its recruitment processes</p> | HR |
| <p>Recruitment, assessment or selection process</p> <p>Notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>Consult with an applicant requesting accommodation to provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability</p> | HR |
| <p>Notice to successful applicants</p> <p>Notify successful applicants of Top Hat's policies for accommodating employees with disabilities.</p> | HR |

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| <p>Informing employees of supports</p> <p>Inform employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.</p> <p>Provided to new employees as soon as practicable after commencing employment</p> <p>Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities</p> | <p>HR</p> |
| <p>Accessible Formats and Communication Supports for employees</p> <p>Upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.</p> <p>Consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However where the needs of an employee with a disability may be accommodated in various different ways, Top Hat reserves the right to determine the type Accessible Format or Communication Support that will be provided in the circumstances.</p> | <p>HR</p> |
| <p>Workplace emergency response information</p> <p>Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Top Hat is aware of the need for accommodation due to the employee’s disability.</p> <p>Provide this information as soon as practicable after becoming aware of the need for accommodation.</p> <p>With the consent of the employee, provide the workplace emergency response information to the person designated by Top Hat to provide assistance to the employee if the employee needs assistance by reason of disability</p> <p>Review individualized workplace emergency response information when the employee moves to a different location in Top Hat, when the employee’s overall accommodation needs or plans are reviewed and when Top Hat reviews its general emergency</p> | <p>HR</p> |

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| response policies. | |
| <p>Documented individual accommodation plans</p> <p>Have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process must include the following elements:</p> <ul style="list-style-type: none"> i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. ii. The means by which the employee is assessed on an individual basis. iii. The manner in which Top Hat can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved. iv. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. v. The steps Top Hat will take to protect the privacy of the employee’s personal information. vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. viii. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability. <p>Where requested, an employee’s individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.</p> <p>Where required, an employee’s individual accommodation plan will include individualized workplace emergency response</p> | <p>HR</p> |

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| information. | |
| <p>Return to Work Process</p> <p>Have in place a documented a return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.</p> <p>The return to work process must outline the steps Top Hat will take to facilitate the employee’s return to work and will include documented individual accommodation plans as part of the process</p> | HR |
| <p>Performance management</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p> | HR |
| <p>Career development and advancement</p> <p>Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans when providing career development and advancement to employees with disabilities.</p> | HR |
| <p>Redeployment</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p> | HR |

DESIGN OF PUBLIC PLACES

(The following requirements only apply to public spaces that are newly constructed or redeveloped on and after January 1, 2017.)

| Description | Responsible Individual/Department |
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| <p>Exterior Paths of Travel</p> <p>Ensure that any exterior paths of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Places Standards.</p> | HR/Operations |
| <p>Off-Street Parking</p> <p>Ensure that when Top Hat constructs new or redevelops off-street</p> | HR/Operations |

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| <p>parking facilities that it intends to maintain, the off-street parking facilities meet the requirements of the Design of Public Places Standards.</p> <p>Off-street parking is a space where you can park your vehicle temporarily that is not on a public road or street.</p> | |
| <p>Obtaining Services</p> <p>Ensure that Top Hat meets the requirements of the Design of Public Places Standards in respect of the following:</p> <ol style="list-style-type: none"> 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas. | HR/Operations |
| <p>Maintenance</p> <p>Ensure accessibility plans include:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces. 2. Procedures for dealing with temporary disruptions when accessible elements required are not in working order. | HR/Operations |