## First Gulf Corporation Accessibility Policy and Multi-Year Accessibility Plan

This multi-year accessibility plan and policy outlines the policies and actions that First Gulf Corporation has in place and continues to take such actions to improve opportunities for people with disabilities.

#### **Statement of Commitment**

First Gulf Corporation is committed to treating people with disabilities in a manner that respects their dignity and independence and to ensuring equal access and participation for people with disabilities. We are committed to do in so by preventing and removing barriers to accessibility and provide alternative ways to meet the accessibility needs of persons with disabilities in a timely manner. First Gulf Corporation is committed to continuing to ensure our organization is compliant in accordance with Accessibility for Ontarians with Disabilities Act, 2005 ("AODA"), the Integrated Accessibility Standards, Ontario Regulation 191/11 ("IASR") and the Human Rights Code, R.S.O. 1990, c. H.19 ("HRC") as it pertains to people with disabilities.

## **\*** Training

First Gulf Corporation will continue to train employees, volunteers, and other persons on Ontario's IASR and on HRC as it relates to people with disabilities. Training will be appropriate to the duties of employees, volunteers and other staff and as soon as practicable.

### Action:

- First Gulf Corporation will determine and ensure that appropriate training on the requirements of the IASR and HRC as it pertains to persons with disabilities, is provided to:
  - o all employees or volunteers;
  - o persons participating in the development and approval of First Gulf Corporation's policies; and
  - o other persons who provide goods, services and facilities on First Gulf Corporation's behalf;
- Training will form part of new hire onboarding process;
- > Training is available on an as-needed basis, as requested;
- > Training will be tracked and recorded and records will be maintained on an on-going basis;
- First Gulf Corporation will continue to provide training in respect of any changes to its current customer service policies on an ongoing basis.

Required legislative compliance: January 1, 2015

Status: Completed and on-going

### Kiosks

First Gulf Corporation will continue to consider accessibility requirements when obtaining designing, procuring or acquiring self-service interactive electronic terminals for public use in Ontario that allows users to access services or products by advising affected employees to review accessibility requirements with the supplier, as required.

Required legislative compliance: January 1, 2014

Status: Completed and on-going

## **❖** Information and Communication

First Gulf Corporation continues to provide or arrange, upon request, the provision of accessible formats and communication supports to people with disabilities in a timely manner and that takes into account their disability and at a cost that is no more than the regular cost charged to other persons. First Gulf Corporation will continue to consult with the person making such request to determine the suitability of an accessibility format or communication support. First Gulf Corporation will also continue to notify the public about the availability of accessible formats and communication supports and will make available on its website a form to request such accessible formats. First Gulf Corporation staff who receive such requests for accessible formats will be trained on how to manage requests and assist in obtaining accessible formats.

## **\*** Accessible Emergency & Safety Information

In the event First Gulf Corporation prepares emergency procedures, plans or public safety information and such information is made public, First Gulf Corporation is committed to providing such information in an accessible format or with appropriate communication supports, as soon as practicable, upon request. First

Gulf Corporation will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and First Gulf Corporation is aware of the need for accommodation due to the employee's disability.

#### Action:

- First Gulf Corporation will continue to inform employees that First Gulf Corporation is committed to providing accessible emergency response information as required and will continue to determine whether any new or current employees require same;
- fire, safety and emergency response information that is publicly available, is available in accessible formats or with appropriate communication supports, upon request.

Required legislative compliance: January 1, 2012

Status: Completed and on-going

# **❖** Feedback, Accessible Formats and Communication Supports

First Gulf Corporation continues to be committed to ensuring that individuals with disabilities have the ability to access our feedback process.

#### Action:

- First Gulf Corporation will continue to provide and/or arrange for the provision of accessible formats of information and communication supports as requested;
- > First Gulf Corporation will continue to consult with persons making information and/or communication support requests to determine the suitability of the accessible format and/or communication support;
- First Gulf Corporation will continue to ensure feedback, accessible formats and/or any communication support(s) requested are available in more accessible formats upon request by individuals with disabilities and at a cost no more than the regular cost charged to other persons;
- > Feedback forms and Alternative Format Request forms are available in an accessible format, taking the person's disability needs into account, upon request;
- First Gulf Corporation will respond to the feedback in a timely manner and in an accessible format.

Required legislative compliance: January 1, 2015

Status: Completed and on-going

## \* Accessible Websites and Website Content

First Gulf Corporation continues to be committed to making publically available information accessible upon request. First Gulf Corporation's website and web content conform with WCAG 2.0 Level AA.

Required legislative compliance: January 1, 2021

Status: Completed

# **\*** Employment

First Gulf Corporation is committed to ensuring our employment practices are fair and accessible by removing any barrier that prevents or hinders the recruitment process. We will also ensure the accessibility needs of employees with disabilities are taken into account if or when using performance management, career development and redeployment processes.

## Action:

## Recruitment:

- potential candidates, employees, staff and the public are notified via our website, in job postings or verbally that First Gulf Corporation accommodates people with disabilities during the recruitment and assessment process;
- > applicants are notified when they are selected for an interview that accessible accommodation can be provided, accommodations are available upon request in relation to the materials or processes to be used;
- First Gulf Corporation shall consult with the applicant to arrange suitable accessible accommodation taking into account the applicants accessibility needs;
- ➤ When First Gulf Corporation notifies the successful applicant of its policies for accommodating employees with disabilities when making offers of employment.

Informing Employees of Supports and Accessible Formats:

First Gulf Corporation will inform its new and existing employees of its policies, and any changes to same, used to support employees with disabilities, including, job accommodations taking into account the employee's accessibility needs;

- First Gulf Corporation will provide accessible workplace information to employees and staff upon request via email and on its intranet and is available in accessible formats upon request:
- First Gulf Corporation will consult with employees with disabilities when requested, to provide accessible formats and communication supports for information required to assist employees perform their job and that is generally available to employees in the workplace.

First Gulf Corporation Individual Accommodation Procedures:

- First Gulf Corporation will continue to offer, develop and implement accommodation plans and emergency response information for employees with disabilities in a format that takes into account the employee's accessibility needs due to disability;
- First Gulf Corporation has established and will continue to implement and improve plans and processes in place for employees absent from work due to a disability and require disability-related individual accommodation plans and/or return to work plans where appropriate.

Required legislative compliance: January 1, 2016

Status: Completed and on-going

# **Design of Public Spaces**

First Gulf Corporation will continue to meet its AODA requirements with respect to the design of public spaces in the event we newly construct or redevelop any public space on or after January 1, 2017.

Action:

First Gulf Corporation will continue to ensure the requirements under the Design of Public Spaces Standards (Accessibility Standards for Built Environment) are followed by any parties involved internally and any third parties requested to construct or redevelop any public space

Required legislative compliance: January 1, 2017

Status: Completed and on-going

<sup>\*</sup> Accessible formats of this information are available for free upon request.