



Human Resources Policy Accessibility Policy - Ontario	Version: 1
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Commitment to an Inclusive and Accessible Work Environment

CloudMD (together with its associates and affiliated entities, the "Company") is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner. We will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Integrated Accessibility Regulation (the "ISAR") of the Accessibility for Ontarians with Disabilities Act ("AODA").

Inclusivity and accessibility are not only legislative requirements, they also align with the Company's core values. Preventing and removing barriers to the Company's services and in our workplace makes sound business and economic sense. An accessible company allows CloudMD to provide services to our clients and retain diverse talent, supporting our company's purpose of Empowering Healthier Living.

Disability

A disability is defined as by Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11:

- Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect, or illness, including diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, 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 a 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.

Accessibility Plan

The Company has developed and will continue to maintain a Multi-Year Accessibility Plan outlining the Company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Multi-Year Accessibility Plan will be reviewed and updated (where applicable) at least once every five years and posted on the Company's website. Upon request, the Company will provide a copy of the Accessibility Plan in an accessible format.

1. Customer Service Standards

1.1 Providing Services to People with Disabilities

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

1.2 Use of Service Animals and Support Persons

Service Animals

An animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his, her or their disability or
- the person provides a letter from a Regulated Health Professional (including but not limited to a physiologist, psychotherapist, chiropractor, nurse, physician, mental health therapist, etc.) confirming that the person requires the animal for reasons relating to the disability.

Customers with disabilities who are accompanied by a service animal are welcome at all Company properties when accessing our services unless the animal is otherwise excluded by law from the premises. If the animal is legally excluded from the premises, the Company will provide alternative measures to enable the person to obtain, use, or benefit from its services.

The Company will ensure that all staff are properly trained on interacting with customers with disabilities and who are accompanied by a service animal.

Support Persons

A support person is an individual who accompanies a person with disabilities to help meet his/her/their communication, mobility, personal care, or medical needs or to assist the person with disabilities in accessing our services. A person with a disability who is accompanied by a support person will be allowed to enter the Company's premises together with the support person and will not be prevented from having access to the support person while on the premises.

1.3 Notice of Disruptions to Service

The Company will provide customers with notice of a planned or unexpected disruption in services usually used by customers with disabilities. This notice will include the reason for the disruption and its anticipated duration and describe alternative facilities or services that may be available.

2. Information and Communication Standards

The Company will communicate to customers with disabilities in ways that take into account their disability. We will train our staff on how to effectively interact and communicate with our diverse community and people with various types of disabilities.

2.1 Feedback

The Company has established a feedback process to ensure people with disabilities are able to provide us with feedback on our products/services. Feedback is always welcome and appreciated and can be submitted in the following formats: in person, by telephone, by mail, or by email.

The Company will continue to ensure that its customers' feedback process is accessible to customers with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.

2.3 Accessible Formats and Communication Supports

Upon request, the Company will provide, or will arrange to provide information in an accessible format and with communication supports in a timely manner that takes into account a customer's accessibility needs due to his/her/their disability.

The Company will consult with the customer making the request to determine the suitability of an accessible format or communication support.

The Company will also notify the public about the availability of accessible formats and communication supports.

2.4 Accessible Websites and Web Content

The Company will ensure that its corporate websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) except where this is impracticable.

2.5 Telephone Services

The Company will train employees to communicate with customers over the telephone in plain language while speaking clearly and slowly. The Company will offer to communicate with customers by e-mail or letter if telephone communication is not suitable to their communication needs or is unavailable.

2.6 Use of Assistive Devices

An assistive device is one or more devices used by a person with a disability to help him/her/them independently complete everyday tasks. Accessibility devices include mobility aids (e.g., wheelchairs and walkers), portable communication devices, head-wands hearing aids, and more.

The Company welcomes the use of assistive devices by our customers to access our services. We will ensure our staff are trained on how to interact with individuals using various assistive devices and how our staff can provide alternative service methods.

3. Employment Standards

3.1 Recruitment

The Company will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

3.2 Recruitment, Assessment, or Selection Process

The Company will notify job applicants selected to participate in an assessment or selection process that accommodations are available upon request relating to the materials or processes to be used.

If a selected applicant requests accommodation, the Company will consult with the applicant and provide, or arrange for, the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs relating to his, her or their disability.

3.3 Notice to Successful Applicants

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities.

3.4 Training

The Company will provide training for all employees who may be acting on the Company's behalf in dealing with the public or any other third parties on how to effectively interact with people with disabilities. In addition, everyone who is involved with and/or influences the Company's policies and standard operating practices and procedures will receive this training. Training will be updated in respect to any changes to the policies, practices, or procedures surrounding accessibility for people with disabilities. Training will be provided within the first week of employment.

Training will include:

- Purposes of the Accessibility for Ontarians with Disabilities Act and requirements of the customer service standard;
- How to interact and communicate with persons of disability in a manner that takes into account his, her or their disability;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use equipment or devices available that may help with the provisions of services;
- Review of Company policies, practices, and procedures pertaining to providing accessible customer service to persons with disabilities; and
- Workplace emergency response information.

3.5 Informing Employees of Supports

The Company will continue to inform its employees of its policies (and any updates to those 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. This information will be provided to new employees as soon as practicable after commencing employment.

3.6 Performance Management and Career Development

The Company will ensure that performance management and career development opportunities are provided to all employees on an equal basis, regardless of disability.

3.7 Individualized Workplace Emergency Response Plans

The Company 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 if the Company is aware of the need for accommodation due to the employee's disability. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where an employee requires assistance, the Company will, with the employee's consent, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed, or when the Company reviews its general emergency response policies.

3.8 Documented Individual Accommodation Plans

The Company will maintain a written process for the development of documented individual accommodation plans for employees with disabilities. The Company is committed to providing reasonable accommodations to employees with disabilities. Employees are encouraged to communicate their accommodation needs to their manager or the Human Resources department. The Manager will engage in an interactive process with employees with support from HR as needed, to determine appropriate accommodations, considering the employee's unique needs.

If requested, information regarding accessible formats and communications supports available will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

3.9 Return to Work Process

The Company will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations to return to work.

The return to work process outlines the steps the Company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return-to-work process created by or under any other statute (i.e. the Workplace Safety Insurance Act, 1997).

4. Modifications to This or Other Policies

The Company is committed to developing customer service policies that respect and promote the dignity and independence of persons with disabilities. Therefore, no changes will be made to this policy before considering the impact on persons with disabilities. Any policy of the Company that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed. This policy and its related procedures will be reviewed as required in the event of legislative changes.

Questions About This Policy

If anyone has a question about the policy or if the purpose of a policy is not understood, an explanation should be provided by or referred to Human Resources

By Email: Accessibility@cloudmd.ca