

| Accessibility Standards for Customer Service | |
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| Procedure No. HR-5.0 | Revision #: 1 Rev. Date: Dec 1, 2023 |
| Original Release Date: 2017 | Review Date: October 1, 2025 |
| Approved By: BP | WC |
| PRESIDENT & CEO | SVP, OPERATIONS & FINANCE |

1.0 Purpose

The purpose of this policy is to develop, implement, and enforce accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, and facilities.

2.0 Scope

This policy has been developed in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11* and the Ontario Regulation, O. Reg. 191/11: Integrated Accessibility Standards and the provisions of the Ontario *Human Rights Code*.

All legislated changes impacting this policy will be reflected in Foyston, Gordon & Payne Inc. (hereinafter referred to as the “Firm”) policy through updates, on an ongoing basis. The policy will be reviewed annually in accordance with applicable legislation. No changes will be made to this policy before considering the impact on people with disabilities.

This policy applies to all employees of the Firm.

Our Commitment

The Firm strives to provide our services and facilities in a respectful and accessible manner to all clients, including persons with disabilities. Persons with disabilities will benefit from the same services, in the same place, in a similar way, as other clients. It is the commitment of the Firm to provide equitable treatment, with respect to providing our services without discrimination in accordance with the provisions of the Ontario *Human Rights Code*.

When providing our services to a person with a disability, we are committed to the following four core principles:

- **Dignity** – Service is provided in a way that allows the person with a disability to maintain self-respect and the respect of others. People with disabilities are not treated as an afterthought or forced to accept lesser service, quality, or convenience.
- **Independence** – Allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
- **Integration** – Service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other clients, unless an alternate measure is necessary to enable the person to access services.
- **Equal Opportunity** – People with disabilities have an opportunity equal to that given to others to access our services.

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3.0 Responsibilities

3.1 Management is responsible for and must do the following:

- Be knowledgeable of all related legislation
- Provide training to all employees
- Establish a process for people to provide feedback on how goods or services are provided to people with disabilities and outline how the Firm will respond and take action. The Firm will ensure that our feedback process is accessible by providing or arranging for accessible formats and communication supports, if requested
- Ensure policies, practices, and procedures are consistent with core principles of the standard

3.2 Employees are responsible for and must do the following:

- Comply with this policy
- Attend training

4.0 Definitions

Disability (as per the Ontario Human Rights Code)

- (a) 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,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”)

Clients

People who receive services from our organization.

Persons with Disabilities

Individuals who have a disability as defined under the Ontario *Human Rights Code*.

Barrier

Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or practice.

Accessibility

Accessibility is the degree to which a product, device, service, environment, or facility is usable by as many people as possible, including persons with disabilities.

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Services

The services provided by the Firm.

Assistive Devices

A device used to assist a person with a disability in carrying out activities or in accessing the services of persons or organizations covered by the customer service standard (i.e., canes, hearing aids, wheelchairs, etc.)

Service Animals

A service animal is an animal for a person with a disability:

- If it is readily apparent that the animal is used by the person for reasons relating to their disability; or
- If the person provides a letter from a physician or nurse, or regulated health professionals (including psychologists, psychotherapists, audiologists, chiropractors, and optometrists) confirming that the person requires the animal for reasons relating to the disability.

Guide Dog

A dog trained as a guide for a blind person and has the qualifications prescribed by the regulations of the Blind Persons' Rights Act.

Support Person

A support person is an individual hired or chosen by a person with a disability to accompany them in order to help with communication, mobility, personal care, medical needs, or with access to goods or services.

Premises

Includes the buildings, land, or grounds where services are provided.

5.0 Procedure

Communication

- 5.1 We will communicate with people with disabilities, to the best of our ability, in ways that take into account their disability and offer communication methods that are suitable to their communication needs (i.e., e-mail, telephone, in-person, etc.).
- 5.2 If a person with a disability requiring assistance has a scheduled meeting at the Firm, the employee who the client is meeting with will notify reception to expect the client. The employee working at reception is required to come out from behind the desk to greet the client when they arrive. The employee meeting with the client will make every reasonable effort to source out and coordinate the set-up of any requested equipment in advance of the meeting.
- 5.3 If a person with a disability requiring a wheelchair enters our premises, the employee working at reception is required to come out from behind the desk to greet the client/visitor. If an extended visit is required, suitable meeting accommodation will be arranged and the

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employee scheduling the meeting is required to take into consideration the person's accommodation needs when making these arrangements.

- 5.4 All employees will be educated and trained on how to address and communicate effectively and appropriately with clients with disabilities.
- 5.5 Information provided on our website and promotional marketing materials will be offered in alternative formats, upon request (i.e., small print vs. large print, offering an in-person meeting to review and read materials or website information if requested, etc.).

Use of Guide Dogs and Service Animals

- 5.6 We are committed to welcoming persons with disabilities accompanied by their guide dog or service animal. A person with a disability will be allowed to enter parts of the premises that are open to the public or third parties with their service animal unless the animal is otherwise excluded by another law. If a service animal is excluded by law, the Firm will use other measures to provide services to the person with a disability.
- 5.7 The Firm is permitted to ask for proof that the animal is a service animal. The person with a disability is required to provide a letter from a physician or nurse, or regulated health professionals (including psychologists, psychotherapists, audiologists, chiropractors and optometrists) confirming that the person requires the animal for reasons relating to the disability.
- 5.8 All employees will be trained on the different types of service animals, as well as how to properly interact with those using service animals.
- 5.9 At no time will a person with a disability who is accompanied by a service animal be prevented from having access to their service animal while on the premises.

Support Persons

- 5.10 We are committed to welcoming persons with disabilities who are accompanied by a support person. A person with a disability will be allowed to enter parts of the premises that are open to the public or third parties with their support person.
- 5.11 In certain cases, the Firm may require a person with a disability to be accompanied by a support person for health and safety reasons. Before making this decision, the Firm will:
 - *Consult with the person with a disability to understand their needs*
 - *Consider health or safety reasons based on available evidence*
 - *Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises*

In such a situation, admission fees or fares (if applicable) will be waived for the support person.

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- 5.12 At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises.

Assistive Devices

- 5.13 We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure employees are trained on and familiar with various assistive devices that may be used by customers with disabilities while accessing our services.
- 5.14 Persons with disabilities shall be permitted to obtain, use, or benefit from our services through the use of their assistive devices.
- 5.15 It is the responsibility of the person with a disability to ensure that their own assistive device is operated in a safe manner at all times.
- 5.16 All employees will be trained as required to use assistive devices and the Firm will maintain accurate records of training delivered to our employees. These records will be made available upon inspection as may be required.

Notice of Temporary Disruption to Facilities or Services

- 5.17 We will provide notice when facilities or services that people with disabilities rely on to access or use services are temporarily disrupted. The notice will be placed in a conspicuous place in areas open to the public or third parties. The notice will include the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Feedback Process

- 5.18 Our ultimate goal is to meet and surpass client expectations while serving clients with disabilities. People with disabilities who wish to provide feedback on the way the Firm provides services to people with disabilities and/or general communication are encouraged to do so.
- 5.19 Comments and feedback can be submitted to the Senior Vice President, Operations & Finance:
- By email at: info@foyston.com
 - By phone at: 416-362-4725
 - In-person at: 1 Adelaide Street East – Suite 2600, Toronto, Ontario
 - By using the Contact Form on the Firm’s website: <https://www.foyston.com/contact>
- 5.20 All feedback, including complaints, will be handled by the Senior Vice President, Operations & Finance and will respond back within ten (10) business days of receiving the feedback.
- 5.21 The Firm will ensure that our feedback process is accessible by providing or arranging for accessible formats and communication supports, if requested.

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Modifications to This Policy and Other Policies

5.22 The Firm will reassess how we provide services to persons with disabilities as often as is necessary to ensure our services are fully accessible. No changes will be made to this policy or other policies before considering the impact on persons with disabilities.

Training

5.23 Upon hire, the Firm will provide training to all employees on providing accessible client service and how to interact with people with various types of disabilities. Employees will complete refresher training every two (2) years. The Firm will maintain accurate records of training delivered to our employees. These records will be made available upon inspection as may be required.

6.0 References and Associated Documents

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11
O. Reg. 191/11: Integrated Accessibility Standards
Ontario Human Rights Code

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| Multi-Year Accessibility Plan | |
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| Procedure No. HR-6.0 | Revision #: 2 Rev. Date: Dec 1, 2023 |
| Original Release Date: June 23, 2021 | Review Date: October 1, 2025 |
| Approved By: BP | WC |
| PRESIDENT & CEO | SVP, OPERATIONS & FINANCE |

1.0 Purpose

This plan outlines the policies and actions that Foyston, Gordon & Payne Inc. (the “Firm”) has put in place to improve opportunities for people with disabilities.

2.0 Statement of Commitment

The Firm 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 people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA and the Integrated Accessibility Standards Regulation (IASR).

Under the AODA and the IASR, the following accessibility standards set the requirements that are applicable to the Firm:

- Customer Service;
- Information and Communications;
- Employment; and
- Design of Public Spaces.

3.0 General Requirements

The Firm is committed to continuing to comply with all general requirements set out by the AODA and the IASR. This includes the requirement to develop, implement, and maintain written policies and procedures; and the requirement to train all employees, volunteers, and other members of the company on the requirements of the accessibility standards set out in the IASR and in the Ontario *Human Rights Code* as it relates to persons with disabilities.

Actions:

- The Firm has developed, implemented, and maintained an Accessibility Policy (HR-5.0 Accessibility Standards for Customer Service). The Policy is reviewed and updated annually.
- The Firm has developed, implemented, and maintained a Multi-Year Accessibility Plan (HR-6.0). The Plan is reviewed and updated at least every five (5) years. The Plan is posted on our website and is available in an accessible format, upon request.
- The Firm has trained and will continue to train all employees on Ontario’s accessibility laws, the Ontario *Human Rights Code* as it relates to people with disabilities, and the accessibility requirements that apply to the Firm. Training is provided in a way that best suits the duties of the employees during new hire orientation. Refresher training is completed every two (2) years. A record of this training is kept, which includes the dates on which training is provided and the number of individuals to whom it is provided.

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4.0 Customer Service Standard

The Firm strives at all times to provide our services in a way that respects the dignity and independence of people with disabilities. We are committed to giving people with disabilities the same opportunity to access the Firm’s services and allowing them to benefit from the same services, in the same place and in a similar way as other clients.

Actions:

- The Firm has met and continues to meet all requirements of the Customer Service Standard, including the establishment of policies related to the use of service animals and support persons; notice of temporary service disruptions; training employees; providing documents in an accessible format or with communication supports upon request; and establishing a feedback process.
- The detailed Customer Service Standard policy and procedure (HR-5.0 Accessibility Standards for Customer Service) is posted on our website and is available in an accessible format, upon request.

5.0 Information and Communications Standard

The Firm 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.

Websites

The Firm has met the website requirements of WCAG 2.0, Level AA. All new content will continue to be reviewed regarding the requirements of WCAG 2.0, Level AA.

Accessible Formats and Communication Supports

The Firm has taken and will continue to take steps to ensure that all publicly available information controlled by the Firm is made accessible upon request. Where a request for an accessible format or communication support is received, we will:

- Consult with the individual making the request to determine their accessibility needs and what would be a suitable format or support.
- Provide the requested information in a timely manner.

Accessible Emergency Information

The Firm is committed to providing clients, contractors, third parties, and any members of the public with publicly available emergency information in an accessible format, upon request.

Feedback Processes

The Firm is committed to ensuring our feedback processes are accessible to people with disabilities by offering various methods of providing feedback, i.e., email, phone, through our website, etc., and will provide our feedback process in an accessible format, upon request. Please refer to HR-5.0 Accessibility Standards for Customer Service Policy which details the feedback process and the designated individual responsible for receiving the feedback.

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6.0 Employment Standard

The Firm is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

- Accessible recruitment and selection processes:
 - The Firm notifies candidates that accommodations are available upon request by including accommodation statements in all job ads posted; when contacting candidates to schedule interviews; and in offers of employment sent to prospective employees.
- Accessible formats and communication supports:
 - The Firm's Employee Handbook contains a Communication Systems, Tools & Resources Policy that notifies employees that we will provide accessible formats and communication supports, upon request.
- Workplace emergency response information:
 - The Firm is committed to providing employees with emergency information in an accessible format, upon request.
 - The Firm's Employee Handbook includes a Workplace Accommodation Policy that states that we will provide individualized workplace emergency response information to employees, in an accessible format, upon request.
 - Upon hire, all employees are required to complete the Employee Information Form and when necessary, the Firm will develop an individualized emergency response plan, if requested.
- Documented individual accommodation plans:
 - The Firm's Employee Handbook includes a Workplace Accommodation Policy that notifies employees of our individual accommodation plan process.
- Performance management, career development, and advancement:
 - The Firm's Employee Handbook includes Performance Management and Performance Improvement Policies that notify employees that accommodations are available when required per our individual accommodation plan process. The Firm will ensure the accessibility needs of employees with disabilities are taken into account if using performance management, career development and advancement, or redeployment processes.
- Return to work process:
 - The Firm's Employee Handbook includes a Workplace Accommodation Policy that notifies employees of our individual accommodation plan process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Actions:

- All policies have been documented in the Employee Handbook and have been implemented.

7.0 Design of Public Spaces Standard

The Firm will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, including:

- Exterior paths of travel and related elements, like sidewalks, ramps, and stairs;

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- Accessible off street parking; and
- Service-related elements, such as service counters, fixed queuing lines and waiting areas.

The Firm has not built or made major modifications to our facility, however, will meet these standards in the future, if required.

8.0 Additional Information

This policy will be reviewed at least every five (5) years, and the Firm will continue to file the Accessibility Compliance Reports every three (3) years. To date, the Firm has submitted accessibility compliance reports as follows:

- Prior to December 31, 2014
- Prior to December 31, 2017
- Prior to June 30, 2021
- Prior to December 31, 2023

For more information about this accessibility plan, please contact **William Cunningham**, Senior Vice President, Operations & Finance:

- By phone at: 416-362-4725
- By email at: info@foyston.com
- On the Firm website at: <https://www.foyston.com/contact>

Accessible formats of this document are available upon request from: **William Cunningham**, Senior Vice President, Operations & Finance.

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