



EFFECTIVE DECEMBER 15, 2015

Accessibility Policy



AMENDED NOVEMBER 29, 2016

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1. General

1.1 Purpose and Scope

The purpose of the Accessibility Policy is to set out OPTrust's vision and goals for developing and implementing its accessibility policies in accordance with its obligation under the *Accessibility for Ontarians with Disabilities Act, 2005* (Ontario) and the regulations thereunder (collectively, the "AODA"). The Accessibility Policy outlines OPTrust's accessibility standards for information, communication and employment in accordance with the AODA (the "Integrated Accessibility Standards"). The Accessibility Policy applies to OPTrust employees, candidates for employment and other prescribed persons, as described more fully in Section 3.

1.2 Statement of Organizational Commitment

As an organization, OPTrust is committed to meeting the accessibility needs of persons with disabilities in a timely manner in accordance with the requirements of the AODA.

1.3 Guiding Principles

OPTrust's approach to accessibility is rooted in the belief that all persons are entitled to dignity, independence, inclusion, integration, and equality of opportunity. OPTrust is committed to providing services in a way that respects the dignity and independence of persons with disabilities and ensures that all employees and candidates for employment within OPTrust receive equitable treatment without discrimination and accommodation where required.

1.4 Legal Framework

The governing legislation is the AODA. Under the AODA, OPTrust must:

- a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its statutory requirements;
- b) post the accessibility plan on its website and provide the plan in an accessible format upon request; and
- c) review and update the accessibility plan at least once every five years.

The AODA does not replace or affect existing legal obligations under the *Human Rights Code* (Ontario) and other laws in respect to accommodation of people with disabilities. The *Human Rights Code* (Ontario) provides individuals with a forum to make complaints against employers. The AODA applies to all organizations in Ontario and increases accessibility for all people in the province. OPTrust's policies and practices comply with both pieces of legislation.

1.5 Related Policies

The Accessibility Policy is to be read in conjunction with the Accessibility Standards for Customer Service which can be accessed on the [OPTrust internet website](#) and the [internal Intranet site](#).

1.6 Guidelines and Procedures

[Procedures](#) supporting this policy as well as the [multi-year accessibility plan](#) are available on the Intranet. These documents should be referred to for more detail on the application of the AODA Policy in our workplace.

1.7 Risk Management

The Board of Trustees (the “Board”) has established the Risk Appetite Statement which defines OPTrust’s approach to risk and the Enterprise Risk Management Policy which identifies the key risks facing OPTrust, including governance, operational, legal and regulatory and reputational. The Accessibility Policy is an integral component of the strategy for mitigating these risks. Specifically, the Policy helps manage governance, operational and legal and regulatory risk by ensuring that as an organization we have the appropriate processes in place to ensure compliance with our legal obligations under the ADOA. The Policy also helps manage reputational risk by ensuring that we are providing services in a manner that respect the dignity of all persons who come into contact with our organization.

2. Accountabilities and Reporting

The Board has delegated responsibility for the administration of the Plan to the President & Chief Executive Officer (“CEO”). As such, the CEO is ultimately accountable to the board for the proper administration of the Plan, including the operation of the AODA Policy.

The CEO is accountable to and reports to the Board on OPTrust’s compliance with AODA and this Policy pursuant to the general grant of authority under the Delegation of Management Authority to the President & Chief Executive Officer, and Matters Excluded from the Delegation to the President & CEO (the “CEO Delegation”).

The CEO hereby delegates to the Chief Pension Officer and Senior Vice President, Human Resources (“SVP HR”) the duty to ensure that OPTrust complies with the AODA and this Policy.

The SVP HR hereby delegates to the VP, Human Resources responsibility for the ongoing maintenance, application and enforcement of the Accessibility Policy.

The VP, Human Resources will report to the SVP HR on compliance of OPTrust with the legal requirements under the AODA and this Policy at such times and in

such format as the SVP HR requires and will provide any required attestations of compliance required by the SVP HR.

The SVP HR will provide the CEO with reports on the compliance of OPTrust with the legal requirements under the AODA and this Policy at such times and in such format as the CEO requires and will provide any required attestations of compliance.

The CEO will provide reports to the Board on the compliance of the organization with the AODA and this Policy at such times and in such format as the Board and the CEO agree.

3. Compliance Standards

3.1 Customer Service Standards

OPTrust strives at all times to provide services in a way that respects the dignity and independence of people with disabilities, by ensuring customers with disabilities receive accessible services with the same quality and timeliness as others do. These principles can be found in OPTrust's Accessible Customer Service Policy, which is posted on the OPTrust website and internal Intranet.

3.2 General Accessibility Standards

1. Training

OPTrust will ensure that training is provided to all employees, volunteers and all persons who participate in the development of the Accessibility Policy and the related procedures (the Accessibility Policy and procedures and any other policies and procedures required under the AODA collectively referred to in Section 3.0 as the "AODA Policies"). Training will be provided on:

- i. the requirements of the Integrated Accessibility Standards;
- ii. the *Human Rights Code* (Ontario) as it pertains to persons with disabilities; and
- iii. the AODA Policies as required by the Integrated Accessibility Standards.

OPTrust will 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.

OPTrust will ensure that contractors providing goods, services and/or facilities on OPTrust's behalf have received the training required under the Integrated Accessibility Standards.

2. Information and Communication Standards

A. Feedback

As set out in the Customer Service Standards, OPTrust will ensure that its 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. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities. Communication supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

OPTrust will notify the public that accessible formats and communications supports are available in respect of its feedback procedures.

B. Accessible Formats and Communication Supports Available Upon Request

All organizational information is made available to OPTrust members and the public in an accessible format or via accessible communication support upon request.

OPTrust will consult with the person making the request to determine the suitability of an accessible format or communication support provided. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable and at a cost that is no more than the regular cost charged to other persons.

OPTrust notifies its members and the public about the availability of accessible formats and communication supports through its website as well as its communication materials.

C. Multi-Year Accessibility Plan and Annual Progress Reports

OPTrust will publish a multi-year accessibility plan to improve the accessibility of its goods, services and facilities and meet the compliance requirements of the AODA. OPTrust will review and update the accessibility plan at least once every five years. In addition, OPTrust will post the accessibility plan on its website, and provide the plan in an accessible format upon request.

D. Accessible Websites and Web Content

OPTrust's websites and web content conform with WCAG 2.0, Level A for web content.

By January 1, 2021, all website content will conform with WCAG 2.0, Level AA.

OPTrust continues work towards increasing the accessibility of its existing web content, website and web-based applications.

E. Accessible Emergency Information

OPTrust will provide emergency response information and assistance to its members and the public in an accessible format or with appropriate communication supports as soon as practicable upon request.

3.3 Employment Standards

The Employment Standards section of policy applies to all employees and candidates for employment within OPTrust.

1. Recruitment, Assessment and Selection

OPTrust is committed to fair and accessible employment practices. Accommodations are available on request for candidates taking part in all aspects of the recruitment, assessment and selection process.

OPTrust will notify the public and employees of the availability of accommodation for job applicants during the recruitment process. Internal and external applicants who have been selected to participate in an interview or selection test will be notified that accommodation for disabilities is available upon request if the applicant requires accommodation due to a disability. OPTrust will consult with applicants to determine how to best meet their needs.

Successful candidates will be notified of our policies for accommodating employees with disabilities when the offer of employment is made.

2. Informing Employees of Support and Creation of Individual Accommodation Plans

Employees at OPTrust will be advised of OPTrust's policy for supporting employees with disabilities, including providing employment-related accommodations and emergency response plans for staff with disabilities. Employees with disabilities will have an accessible individual accommodation plan developed by Human Resources in consultation with the employee. The plan will include considerations for performance management, career development and redeployment.

3. Accessible Formats and Communication Supports

Where an employee with a disability requests it, OPTrust will consult with the employee and provide or arrange for the provision of accessible formats and communication support for information that is needed to perform the employee's job, or for information that is generally available to employees in the workplace.

4. Workplace Emergency Response

OPTrust shall provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. This includes, where required, the creation of individualized emergency response plans which are accessible so employees with disabilities can understand them. With the employee's consent, OPTrust will assign designated response persons to provide the necessary support during an evacuation, providing the employee with a copy of the plan and following up with the employee periodically to ensure the plan is up-to-date.

5. Documentation of Individual Accommodation Plans and Return to Work

OPTrust will maintain a process for the development of documented individual accommodation plans. Human Resources will develop and use a standard template for the development of individual accommodation plans and return-to-work programs.

6. Performance Management

OPTrust will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

7. Career Development, Advancement and Redeployment

OPTrust will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development, advancement and redeployment to its employees with disabilities.

4. Amendment

The SVP HR is responsible for amending the Accessibility Policy. Amendments to the Accessibility Policy shall be presented for discussion at the Operating Committee ("OC") by the SVP HR (or a delegate). The CEO shall approve the final version of the Policy (as amended based on the discussion at the OC, if applicable).

Amendments to this Policy which are of a technical/administrative nature (e.g. changes for conforming purposes) may be approved by the CEO without discussion at the OC.

All amendments shall be effective on the date on which the Policy is presented to the OC, unless another date is specified.

Approved effective December 15, 2015
Amended effective September 27, 2016
Further amended November 29, 2016



Hugh O'Reilly
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