Accessibility Policy

Last Updated: October 1, 2021

Prepared by WarnerMedia Ottawa
Accessibility Policy

PURPOSE:

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of goods and service delivery, accommodation, and access to employment.

In meeting these objectives, WarnerMedia Ottawa is governed by this policy as well as the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (IASR).

The Accessibility Policy will be available in an accessible format upon request.

APPLICATION AND SCOPE:

The policy applies to all employees and representatives of WarnerMedia Ottawa who deal with clients and external third parties.

EXCEPTIONS:

WarnerMedia Ottawa’s scope of responsibility is limited to the product developed by WarnerMedia Ottawa and not to the projects built on the WarnerMedia Ottawa Engine by external parties.

POLICY STATEMENT:

WarnerMedia Ottawa is committed to providing a respectful, welcoming, accessible, and inclusive environment in a way that is respectful of the dignity and independence of all, including people with disabilities, and in a manner which takes into account a person’s disability, embodying the principles of integration and equal opportunity.

WarnerMedia Ottawa is committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with WarnerMedia Ottawa.

WarnerMedia Ottawa is committed to, and will strive to ensure that, the AODA, its regulations, standards and all other relevant legislation concerning accessibility, are rigorously observed in a timely fashion.

This Accessibility Plan sets out WarnerMedia Ottawa’s policy on how it will achieve accessibility generally, as well as in customer service, employment, and information and communications.
DEFINITIONS:

“Customer” includes members, vendors, partners and any other third parties with whom WarnerMedia Ottawa directly interacts.

“Disability” means:

- 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, and 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 service animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a development 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.

“Barrier” includes anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, architectural barrier, information or communications barrier, attitudinal barrier, technological, policy or practice.

‘Assistive Device’ any piece of equipment a person with a disability uses to help him or her with daily living. Personal assistive devices include, but are not limited to, wheelchairs, hearing aids, white canes or speech amplification devices.

“Service Animal” is any animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability.

“Support Person” is a person who accompanies a person with a disability in order to help him or her with daily tasks.

“Accessible Format” means a format of communication that may include but is not limited to large print, recorded audio and electronic formats, Braille or other formats usable by persons with disabilities.

“Communication Supports” include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

1. CUSTOMER SERVICE STANDARD

Core Principles and Purpose of Customer Service Standards

WarnerMedia Ottawa is committed to the provision of its services in a way that is consistent with the principles of dignity, independence, integration and equity by:

- Providing services in a manner that respects the dignity and independence of persons with disabilities;
- Providing services so that persons with disabilities are able to fully benefit from the same services, in the same place, and in the same or similar way as persons without
disabilities, unless an alternative measure is necessary to enable a person with a disability to obtain, use, or benefit from WarnerMedia Ottawa's services; and

- Giving people with disabilities the same opportunity equal to that of persons without disabilities to obtain, use or benefit from WarnerMedia Ottawa’s services.

**Use of Assistive Devices**

WarnerMedia Ottawa permits persons with disabilities to use their personal assistive devices while on WarnerMedia Ottawa’s premises to obtain, use, or benefit from WarnerMedia Ottawa’s services.

**Communication**

When communicating with a person with a disability, WarnerMedia Ottawa will do so in a manner that takes into account the person’s disability.

**Use of Service Animals and Support Persons**

**Service Animals:** Persons with disabilities who are accompanied by guide dogs or other service animals will be permitted to enter WarnerMedia Ottawa’s premises and attend WarnerMedia Ottawa events with the animal and will be allowed to keep the animal with them, unless the animal is otherwise excluded by law. If the service animal is excluded by law, WarnerMedia Ottawa will use reasonable efforts to ensure that alternate means are available for persons with disabilities to obtain, use or benefit from WarnerMedia Ottawa’s services.

**Support Persons:** Persons with disabilities who are accompanied by a support person will be permitted to enter WarnerMedia Ottawa’s premises that are open to the public and will not be prevented from having access to the support person while on the premises.

WarnerMedia Ottawa may require a person with a disability to be accompanied by a support person while on WarnerMedia Ottawa premises in situations where it is deemed necessary to protect the health and safety of the person with a disability and/or others and where there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.

When support persons are required for WarnerMedia Ottawa sponsored meetings or events, the person with a disability will be required to provide his or her own support person. If there are fees associated with the meeting or event, the support person will be charged the regular fee. Advance notice of said fees will be provided if such circumstances exist. If WarnerMedia Ottawa requires a person with a disability to be accompanied by a support person when on the premises, WarnerMedia Ottawa shall waive payment of the amount, if any, payable in respect of the support person’s admission to the premises or in connection with the support person’s presence on the premises.

**Notice of Temporary Disruptions**

In the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities, WarnerMedia Ottawa will post a notice about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at or near the affected facility or service and/or through other means (e.g., website) where necessary. If the disruption is anticipated, WarnerMedia Ottawa will provide a reasonable amount of advance notice of the disruption. If the disruption is unexpected, notice will be provided as soon as possible.

**Feedback Process**
WarnerMedia Ottawa is committed to providing high quality services to all members of the public that it serves, including those with disabilities. Comments on how well WarnerMedia Ottawa achieves this goal are welcomed and appreciated.

Feedback from members of the public regarding the way WarnerMedia Ottawa provides services to people with disabilities can be made by telephone, in person, in writing, in electronic format (e.g. e-mail) or through other relevant methods.

Feedback should be directed to the People & Culture department who can be reached at:

307 Legget Dr
Ottawa, ON Canada
K2K 3C8
613.228.9107
HrOttawa@warnermedia.com

WarnerMedia Ottawa will consider feedback carefully. Members of the public that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted. We can arrange for accessible feedback and alternate formats upon request.

WarnerMedia Ottawa will ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner.

Questions or concerns about the WarnerMedia Ottawa Customer Service Standards or AODA Employees may address any questions or concerns to the People & Culture department. For more information on the Customer Service Standards, please contact the People Operations department at 613.228.9107.

2. INFORMATION AND COMMUNICATION STANDARD

This policy governs how WarnerMedia Ottawa will achieve the accessibility needs of persons with disabilities in the provision of information and communication.

This policy does not apply to information that WarnerMedia Ottawa does not control directly or indirectly through a contractual relationship. While WarnerMedia Ottawa provides no direct content for the end users of its content program, WarnerMedia Ottawa will work with its members and publishing partners to facilitate the provision of WarnerMedia Ottawa licensed content in broadly accessible formats.

Accessible formats and communication supports

As described above, WarnerMedia Ottawa will 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 communication supports, upon request.

WarnerMedia Ottawa will notify the public about the availability of accessible formats and communication supports.

Where accessible formats and communication supports for persons with disabilities are
requested:

- WarnerMedia Ottawa will provide or arrange for accessible formats and communication supports where appropriate for persons with disabilities in a timely manner that takes into account each person’s accessibility needs.
- WarnerMedia Ottawa will consult with the person making the request to determine the suitability of an accessible format or communication support.
- Communication supports will be provided at a cost that is no more than the regular cost charged to other persons.

Emergency procedure, plans or public safety information

Publicly available emergency and public safety information will be provided in an accessible format or with appropriate communication supports, on request.

Accessible websites and web content

By January 1, 2021, WarnerMedia Ottawa will ensure that WarnerMedia Ottawa websites and web content, except for exclusions set out in the IASR, will conform to WCAG 2.0 Level AA Standards.

3. EMPLOYMENT STANDARD

WarnerMedia Ottawa’s policies and practices are intended to build an inclusive and accessible work environment free from discrimination and harassment. This includes providing accessibility at all stages of the employment cycle.

Recruitment

WarnerMedia Ottawa will notify employees and the public about the availability of accommodations for applicants with disabilities. This will include:

- specifying that accommodation is available for applicants with disabilities, on WarnerMedia Ottawa's website and on job postings;
- the notification of availability of accommodation notice as part of the scheduling of an interview and/or assessment;
- If a selected applicant requests any accommodation, WarnerMedia Ottawa will consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;
- Notify successful applicants of the policies for accommodating employees with disabilities.

Employee Supports

WarnerMedia Ottawa will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that will take into account an employee’s accessibility needs due to disability. WarnerMedia Ottawa will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodation that takes into account an employees’ accessibility needs due to disability.

Accessible Formats and Communication Supports for Employees
Upon request from an employee with a disability, WarnerMedia Ottawa will consult with the employee to arrange for the provision of accessible formats and communication supports for:

- information that is needed in order to perform the employee’s job;
- information that is generally available to employees in the workplace.

WarnerMedia Ottawa will consult with the employee making the request in determining the suitability of an accessible format or communication support.

**Workplace Emergency Response Plan**

WarnerMedia Ottawa will be implementing the following measures to address Emergency Response for employees who have disabilities:

- individualized workplace emergency response information will be provided for employees with disabilities where required;
- if an employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, WarnerMedia Ottawa shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.
- on an ongoing and regular basis, and as per the applicable terms of the IASR, WarnerMedia Ottawa will review and assess general workplace emergency response procedures and individualized emergency response information to ensure accessibility issues are addressed.

**Individual Accommodation Plan**

WarnerMedia Ottawa will develop and document an individual accommodation plan for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communication supports.

WarnerMedia Ottawa will have in place a written process for the development of documented individual accommodation plans for employees with disabilities that includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which WarnerMedia Ottawa can request an evaluation by an outside medical or other expert, at WarnerMedia Ottawa’s expense, to assist WarnerMedia Ottawa in determining if and how accommodation can be achieved;
- steps to protect the privacy of the employee’s personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs;
- the following will be included if individual accommodation plans are established:
  - any individualized workplace emergency response information that is required;
  - any information regarding accessible formats and communication supports that
have been provided for or arranged, in order to provide the employee with:
  ■ information that is needed in order to perform the employee’s job;
  ■ information that is generally available to employees in the workplace; and
  ○ identify any other accommodation that is to be provided to the employee.

Return to Work Process

WarnerMedia Ottawa will develop and document a return to work process for employees returning to work due to disability and requiring disability-related accommodations. WarnerMedia Ottawa will work with the employee to ensure the employee’s reintegration is successful.

WarnerMedia Ottawa will ensure that the return to work process as set out in its existing policies outlines:

  ● the steps WarnerMedia Ottawa will take to facilitate the employee’s return to work after a disability-related absence; and
  ● the use of individual accommodation plans, as discussed above, in the return to work process.

Performance Management, Redeployment and Career Development

WarnerMedia Ottawa will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, advancement, performance management and when redeploying employees with disabilities.

Training Policy

All employees, volunteers, every person who provide goods, services or facilities on behalf of WarnerMedia Ottawa, and every other person who participates in developing the organization’s policies, will be trained on their responsibilities and obligations referred to in the AODA, its regulations and the Human Rights Code, as it pertains to persons with disabilities.

Training will be appropriate to the duties of the employee or participating person.

Training will be provided to new hires as part of the orientation process of employment; for all others, training will take place as soon as it is practicable and when changes are made to the plan. Upon completion, WarnerMedia Ottawa will keep a record of the training provided including the dates on which the accessibility training took place.

REVIEW PERIOD:

This policy will be reviewed triennially by the Executive Team and will be revised in light of any legislative or organizational changes.

I acknowledge I have read & understood the terms set out in this WarnerMedia Ottawa Accessibility Policy.

Name: Date:

Signature: