

# Accessibility & Accommodation Policy

HUMAN RESOURCES



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Effective  
May 13, 2024

## OVERALL PRINCIPLES

OMERS is committed to ensuring that our services, premises and workplaces are accessible to people with disabilities and to providing equal employment opportunities to individuals with disabilities, in compliance with applicable legislation in the jurisdictions in which OMERS and Oxford operate.

If you have a disability and require accommodation, please submit a case in Workday here to reach our disability management team. If you require a non-medical accommodation, please speak with your people leader and submit a case in Workday [here](#) to reach our employee and labour relations team. In all cases, we will make every reasonable effort to support you. e every reasonable effort to support you.

This Accessibility & Accommodation Policy (this "Policy") is available to the public, job candidates and to Employees on internal and external websites, and in other formats upon request.

**This Policy applies to all Employees and Contractors across OMERS, which for clarity, includes Oxford.**

Next renewal date:	January 2026
Frequency of review:	Every 2 years

## Support for Persons with Disabilities

We strive to provide our services and premises in a way that respects the dignity and independence of people with disabilities. If you are an employee and need accommodation for a disability, submit a Workday case here, and we will engage in an interactive dialogue with you to determine the precise limitations of your disability and explore potential reasonable accommodations that could overcome those limitations. If you are a member of the public or a potential candidate, you can request accommodation by filling out this form:

[//www.omers.com/general-public-inquiries](http://www.omers.com/general-public-inquiries).

If you visit our premises or contact us for any reason, we will make all reasonable attempts to accommodate your needs. For example:

- we will accommodate assistive devices that help you perform everyday tasks;
- service animals are welcome on our premises that are open to the public to the extent permitted by applicable law. In the event a service animal is excluded from our premises by law (including for health or safety reasons), OMERS is committed to exploring and applying other measures to enable you to access, use and/or benefits from our premises;
- support persons are welcome on our premises. In the event OMERS requires a person with a disability to be accompanied by a support person, OMERS will only decide so after first consulting with the person and considering the available evidence of (i) whether the support person is necessary to protect the health or safety of the person with the disability or the health or safety of others on the premises; and (ii) whether there is no other reasonable way to protect the health or safety of the persons with the disability or the health or safety of others on the premises; and

- we will provide accessible formats and communication supports, such as large-font, recorded audio, or teletypewriter (TTY) through a telecom provider, upon request and at a cost equal the regular cost charged to others, if any.

We consider the needs of people with disabilities when we design or acquire self-service kiosks, and when we design or modify our buildings and public spaces.

We will ensure that our websites comply with international standards for making web content more accessible for people with disabilities.

If there will be any disruptions to our services or facilities, we will post notices of the disruption at impacted locations, including on our websites and/or on our telephone lines, as appropriate, confirming the reason for the disruption, its anticipated duration and a description of any alternative available services or facilities.

## Applying for a Job

Our online job application notifies applicants that we will provide reasonable accommodations to applicants with disabilities throughout the recruitment and selection process, unless doing so would create an undue hardship for their employer. If you are contacted about an employment opportunity, and you require accommodation please request a reasonable accommodation through your OMERS HR contact and we will engage in an interactive dialogue with you to determine the precise limitations of your disability and explore potential reasonable accommodations that could overcome those limitations.

## Support for Employees with Disabilities

If you are an OMERS Employee and you have a disability, or you become disabled either permanently or temporarily during your employment with us, we encourage you to contact the People Experience team via Workday if you believe that you require an accommodation. We will engage in an interactive dialogue with you to determine the precise limitations of your disability, explore potential reasonable accommodations that could overcome those limitations and develop an Individual Accommodation Plan suited to meet your needs. Employees who wish to have a representative participate in the development of their Individual Accommodation Plan should let the People Experience team know. In some cases, in compliance with applicable law, we may need to request an evaluation by an outside or occupational medical practitioner or other expert, in order to determine an

appropriate accommodation. appropriate accommodation.

## Determinations

OMERS makes determinations about reasonable accommodations on a case-by-case basis considering various factors and based on an individualized assessment in each situation. We strive to make determinations on reasonable accommodation requests expeditiously and will inform the individual once a determination has been made. If we determine that a particular accommodation would not be reasonable or would impose an undue hardship, we will explain our reasons and try to find an alternative solution where possible.

## Individual Accommodation Plan

An Individual Accommodation Plan will include an outline of the reasonable accommodation or adjustments needed by you or required by applicable law, including any accessible formats and communications required to enable you to perform your job appropriately and to make workplace information accessible. If you believe you may need support during an emergency, such as a building evacuation, let a People Experience advisor know and we will develop an Individualized Emergency Response Plan to ensure you stay safe.

Your Individual Accommodation Plan, and any information that you provide about your disability (including but not limited to medical information), will be kept confidential. Information will only be shared, with your consent, with individuals who may need to provide assistance, such as your manager.

Your Individual Accommodation Plan, and any Individualized Emergency Response Plan, will be reviewed with you regularly and updated if (i) your accommodations needs or plans are reviewed and/or change, (ii) if you are transferred to another location or a different job; or (iii) when OMERS reviews its general emergency standards and procedures. We will also consider your needs throughout our performance management process and career development programs such as learning programs, networking groups, and mentoring and in any redeployment process.

If you have been off work due to a disability and require accommodation in order to return to work, your Individual Accommodation Plan will also include a return-to-work process which will set out the steps that will be taken to facilitate your return to work.

## No Retaliation

Individuals will not be retaliated against for requesting an accommodation in good faith. OMERS expressly prohibits any form of discipline, reprisal, intimidation, or retaliation against any individual for requesting an accommodation in good faith.

If Employees or applicants feel that they or someone else may have been subjected to conduct that violates this Policy, they should report it immediately to the Policy Manager. If Employees do not report retaliatory conduct, OMERS may not become aware of a possible violation of this Policy and may not be able to take appropriate corrective action.

## Training

We provide accessibility training to all (i) Employees and volunteers; (ii) all persons who participate in developing OMERS policies and; (iii) all other persons who provide services or facilities to customers on behalf of OMERS. This training ensures that our services, premises and workplaces are accessible to people with disabilities, in compliance with applicable legislation in the jurisdictions in which OMERS operates.

For example, in Ontario, we comply with the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. In Ontario, all necessary trainees (as set out above) receive training on the requirements of the AODA, the applicable integrated accessibility standards under AODA and on the *Human Rights Code* as it pertains to persons with disabilities. The training received by these individuals occurs within 30 days of hire and includes:

- the purposes of the AODA, the integrated accessibility standards and the *Human Rights Code* as it pertains to persons with disabilities;
- how to interact and communicate with people with various types of disabilities;
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- what to do if a person with a disability is having difficulty in accessing our services;
- our policies, practices and procedures relating to accessibility; and
- training on the equipment and devices that are available on our premises.

Accessibility training is provided on an ongoing basis in respect of any changes to this Policy. Training may also be provided that exceeds local standards, when it is in

keeping with OMERS values and commitment to ensure accessible workplaces and services.

## Feedback

We will ensure that processes for receiving and responding to feedback are available to persons with disabilities. We will arrange accessible formats and communication supports upon request, in a timely manner, and at a cost equal to the regular cost charged to others, if any.

Feedback on this Policy and on our provision of services to people with disabilities may be provided to:

Celine Chiovitti, EVP, Head of Pensions  
(416) 369-2383  
[cchiovitti@omers.com](mailto:cchiovitti@omers.com)

Nancy Nazer  
Chief Human Resource Officer  
(416) 369-2493  
[nnazer@omers.com](mailto:nnazer@omers.com)

In the event OMERS receives a complaint about the manner in which it provides services or facilities to persons with disabilities, it will review the complaint and provide a response.

## Responding to Incidents of Non-Compliance

The Policy Manager is responsible for administering and identifying incidents of potential non-compliance under this Policy based on established procedures and reporting such incidents to the Policy Sponsor.

## Exceptions

Exceptions to this Policy must be approved by the Policy Sponsor. The Policy Manager will maintain a written record of exceptions and provide a copy to Compliance & Ethics.

## Monitoring and Reporting

This Policy and our Multi-Year Plan are reviewed regularly, to ensure we continue to meet our commitments and comply with all applicable legislation.

The Policy Monitor is responsible for implementing procedures for monitoring compliance with this Policy, responding to feedback on the Policy or our services to people with disabilities and responding to incidents of non-compliance.

## Documents related to this Policy

In compliance with the AODA and to reflect OMERS practices in other jurisdictions, we have a Multi-Year Accessibility Plan included as Appendix A in this Policy, which outlines how we will meet applicable accessibility requirements.

### ROLES & RESPONSIBILITIES

Policy Approver and Sponsor	Chief Human Resources Officer	Ultimately accountable for the Policy, including its development, implementation, administration and approval
Policy Manager and Monitor	Senior Vice President, People Experience	Responsible for the design and operational effectiveness of the day to day administration of the Policy and for the monitoring, compliance and reporting functions of the Policy

## APPENDIX A MULTI-YEAR ACCESSIBILITY PLAN

This plan outlines the measures OMERS has taken and will take to identify, remove and prevent barriers to people with disabilities, in compliance with applicable law.

### 1. Training

OMERS will continue to provide training to staff on applicable accessibility laws, in accordance with the Accessibility Standards for Customer Service regulations under the *AODA*, on the *Human Rights Code*, and any other applicable legal requirements as it relates to people with disabilities. Training is provided in a way that best suits the duties of staff members. We have taken the following steps to ensure staff receive the training needed to meet applicable accessibility laws:

- Training about accessibility and the requirements set out under this Policy is provided to employees, as required; and
- New Employees are required to complete the Compliance training within 30 days of their hire date.

### 2. Kiosks

We have considered the needs of people with disabilities when designing, procuring or acquiring self-service kiosks. We have considered technical and structural features of kiosks, as well as accessible paths to the kiosks.

### 3. Information and Communications

OMERS is committed to meeting the communication needs of people with disabilities.

OMERS has taken the following steps to ensure existing feedback processes are accessible to people with disabilities upon request:

- We administer our feedback processes in accessible formats and make communication supports available upon request.

OMERS has taken the following steps to make sure all publicly available information is made accessible upon request:

- We provide information and communications in accessible formats and with communication supports to people with disabilities upon request; and
- Where people with disabilities request information and communications in accessible formats, including communication supports, this is provided

in a timely manner and at a cost equal to the regular cost charged to others, if any.

OMERS has taken the following steps to make all websites and content conform with WCAG 2.0, Level AA:

- We have ensured that all websites and web content, including web-based applications, that we control directly or indirectly through a contractual relationship that allows for modification of the product, meet the WCAG 2.0 Level AA standard.

### 4. Employment

OMERS is committed to fair and accessible employment practices. We take the following steps to notify the public and staff that, when requested, we provide reasonable accommodations to people with disabilities during the recruitment and assessment processes and when people are hired, unless doing so would create an undue hardship:

- All recruitment is managed through the online Applicant Tracking System. We include a statement in the Applicant Tracking System, including job postings and employment letters, to inform all applicants and employees that persons with disabilities will be accommodated in accordance with applicable law throughout the recruitment and selection process and for the duration of employment with OMERS;
- Successful candidates are notified of our policies for accommodating employees with disabilities when the offer of employment is made; and
- Candidates may be granted an accommodation, upon request, as part of the recruitment process.
- Upon the Employee's request, OMERS will consult with an Employee with a disability to provide or arrange for the provision of suitable accessible formats and communication supports for (i) information that is needed to perform the Employee's job; and (ii) information that is generally available to Employees in the workplace.

OMERS has taken the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- HR has developed a standard template for the development of individual accommodation plans and return-to-work programs.

We have taken the following steps to ensure the accessibility needs of employees with disabilities are

taken into account in performance management, career development and redeployment processes:

- Employees with disabilities have an individual accommodation plan developed by HR in consultation with the employee and manager. The plans include consideration for performance management, career development and redeployment processes.

- Phone: 416.369.2400
- Online: <mailto:design@omers.com>  
<https://www.omers.com/general-public-inquiries>
- Mail: 900-100 Adelaide St W Toronto, Ontario, M5H 0E2 Canada

## 5. Design of Public Spaces

We meet the Ontario Accessibility Standards for the Design of Public Space and have considered the UK Code of Practice on Design of an Accessible and Inclusive Built Environment when building or making major modifications to public spaces. Public spaces include:

- recreational trails/beach access routes;
- outdoor public eating areas like rest stops or picnic areas;
- outdoor play spaces, like playgrounds in provincial parks and local communities;
- outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals;
- accessible off-street parking; and
- service-related elements like service counters, fixed queuing lines and waiting areas.

Oxford has put procedures in place to prevent service disruptions to the accessible parts of its public spaces.

In the event of a service disruption to the accessible parts of public spaces, we notify the public of the service disruption and alternatives available.

The OMERS Multi-Year Accessibility Plan will be reviewed and updated every 5 years.

For more information on this accessibility plan, please contact Carol Alfieri, Vice President, People Experience, Human Resources

- Phone: 437-882-6953
- Email: [calfieri@omers.com](mailto:calfieri@omers.com)

Accessible formats of this document are available free upon request by submitting a request as follows:

## APPENDIX B ACCESSIBILITY LEGISLATION

The following links provide information on applicable accessibility legislation in each jurisdiction in which OMERS and Oxford operate:

### Australia

- [Disability Discrimination Act 1992 \(Cth\)](#)
- [Anti-Discrimination Act 1977 \(NSW\)](#)

### Canada

- Ontario: [Accessibility for Ontarians with Disability Act, 2005](#)

### France

- [Employment Equality Directive – Directive 2000/78/EC](#)
- [Equal rights and opportunities, participation and citizenship for people with disabilities Act of 2005](#)

### Germany

- [Employment Equality Directive – Directive 2000/78/EC](#)
- [General Equal Treatment Act 2006](#)
- [Ordinance on Workplaces, 2004](#)

### Luxembourg

- [Employment Equality Directive – Directive 2000/78/EC](#)

### Netherlands

- [Employment Equality Directive – Directive 2000/78/EC](#)

### United States

- Federal: [Americans with Disabilities Act of 1990](#)
- California: [Fair Employment and Housing Act](#)
- New York: [New York State Human Rights Law](#)
- Washington D.C.: [D.C. Human Rights Law](#)
- Massachusetts: [Massachusetts Fair Employment Practices Law](#)
- Georgia: [Georgia Equal Employment for Persons with Disabilities Code](#)

### United Kingdom

- [Equality Act 2010](#)