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INTEGRATED ACCESSIBILITY STANDARDS REGULATION & AODA

STATEMENT OF COMMITMENT, POLICY & MULTI-YEAR ACCESSIBILITY PLAN

This policy and plan formalizes Gannett Fleming Canada ULC’s (“Gannett Fleming”) commitment to accessibility, and outlines those steps that Gannett Fleming will take to remove barriers and improve opportunities for people with disabilities through compliance with the Integrated Accessibility Standards Regulation (the “IASR”).

Individuals can request a copy of this policy and plan at any time in a format or with communication supports that meet the needs of the individual.

Gannett Fleming will file accessibility compliance reports online pursuant to the requirements in the legislation and its regulations.

GANNETT FLEMING CANADA ULC STATEMENT OF COMMITMENT

Gannett Fleming is committed to treating all people in a way that allows them to maintain their dignity and independence. Our vision is built upon a foundational belief in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner. We are dedicated to breaking down barriers to accessibility, preventing new barriers from arising and to meeting all the accessibility requirements prescribed by the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”).

In order to meet this commitment, Gannett Fleming is currently complying with those provisions of the AODA that are in effect and we have created a multi-year accessibility plan for the purpose of continuing to meet our commitment and the requirements under the AODA.

ACCESSIBILITY POLICY & ACTION PLAN

I. Communication

Gannett Fleming is committed to meeting the communication needs of persons with disabilities and to communicating in ways that take into account their disability. Gannett Fleming will, upon request, consult with persons with a disability in order to determine the suitability of an accessible format or communication support.

Gannett Fleming is committed to providing and arranging for the provision of accessible formats and communication supports in a timely manner and at a cost that is no more than the regular cost charged to other persons.

II. Assistive Devices

Gannett Fleming welcomes persons with disabilities to use their personal assistive devices while on the organization's premises. Once notified of the need for a personal assistive device, we will ensure that our staff are trained and familiar with the various assistive devices that are on site or that are otherwise provided that may be used by persons with disabilities while accessing the organization's premises.

III. Service Animals and Support Persons

Gannett Fleming welcomes onto its premises service animals and support persons upon whom persons with disabilities rely on. Gannett Fleming will advise the parties as soon as possible about any costs they will incur in connection with having a support person.

IV. Notices of Temporary Disruptions

Gannett Fleming will notify persons with disabilities promptly in the event of a planned or unexpected disruption to services or facilities of the provider. This notice is available on request and will be posted in public areas, such as our website, or by other methods as is reasonable in the circumstances. The notice will include information about the reasons for the disruption, its anticipated duration, and any available alternatives, if any, that are available.

V. Accessible Emergency Information

Gannett Fleming is committed to providing its customers and clients with publicly available emergency information in an accessible format and/or with appropriate communication supports, upon request.

We also provide individualized emergency response information to employees who, for reasons related to their disability, require such information and to persons designated by the employer to provide assistance to the employee who receives individualized emergency response information. Gannett Fleming is committed to providing the information as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

VI. Training of Staff

Gannett Fleming will provide training to all employees, volunteers, persons participating in the development and approval of Gannett Fleming's policies, and others who provide goods, services or facilities on behalf of Gannett Fleming on:

- the Integrated Accessibility Standards of the AODA; and
- the Human Rights Code as it relates to people with disabilities.

Training will be appropriate to the duties performed by the individual and it will be provided as soon as practicable after an individual begins working, volunteering or otherwise providing services necessitating training.

Gannett Fleming will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws:

- Gannett Fleming will assign one or more members of its Human Resources Department to identify and select appropriate training programs on the Integrated Accessibility Standards of the AODA.

- Similarly, such individual(s) will review and update existing training programs on the Human Rights Code as it relates to people with disabilities.
- Gannett Fleming will provide the above-noted training in order to ensure that any individual requiring it will have received the necessary training.
- Gannett Fleming will keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.
- Gannett Fleming will ensure that training is provided on any changes to relevant policies on an ongoing basis.

VII. Information & Communication

Gannett Fleming is committed to creating, providing and receiving information and communications in ways that are accessible for people with disabilities. We are committed to meeting the communication needs of people with disabilities. We will consult with employees, customers and clients with disabilities to determine their information and communication needs as requested or required.

Websites

Gannett Fleming is committed to ensuring that our websites and content on those websites conform with WCAG 2.0, Level A, and will continue to work closely with our IT department to ensure any new websites and new content on those websites meet this standard.

Feedback Processes

Gannett Fleming will ensure that it establishes a feedback process, readily available to the public, for receiving and responding to feedback about the manner in which it provides goods, services or facilities to persons with disabilities and feedback about whether this process is accessible to persons with disabilities. Gannett Fleming will take the following steps to ensure existing feedback processes are accessible to people with disabilities:

- Gannett Fleming will review its existing processes for receiving feedback, to ensure that persons with a disability can provide feedback in a manner that meets their particular needs.
- Upon request and in a timely manner, Gannett Fleming will provide an accessible format and/or communication support to enable an individual with a disability to provide feedback. For example, feedback forms, along with alternate methods of providing feedback, such as verbally, in person, or by telephone, or written and delivered (or written and sent via email), will be made available upon request.
- Upon request and in a timely manner, Gannett Fleming will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication supports.
- Gannett Fleming will follow up in a timely fashion with any person who makes a complaint. Along with providing acknowledgement of such feedback, Gannett Fleming will communicate any resulting actions based on concerns or complaints that were submitted.

Publicly Available Information

Gannett Fleming will take the following steps to make sure all publicly available information is made accessible to persons with disabilities:

- Gannett Fleming will review its existing processes for providing the public with information, to ensure that disabled individuals can also receive such information in a manner that meets their particular needs.



- Upon request and in a timely manner, Gannett Fleming will provide an accessible format and/or communication support to enable an individual with a disability to receive publicly available information.
- Requested information will be provided in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
- Gannett Fleming will consult with the person making the request to determine the suitability of the accessible format or communication support that is requested.

VIII. Employment

Gannett Fleming is committed to providing for fairness and accessibility across all stages of the employment life cycle, allowing employees to reach their full potential.

Recruitment

Gannett Fleming will take the following actions to achieve these goals during the recruitment and assessment processes:

- Gannett Fleming will ensure that its website and any job postings will specify that accommodation is available for applicants with disabilities during the recruitment and interview/assessment processes.
- Gannett Fleming will train its staff involved in recruitment and hiring to advise applicants verbally, at the time that they are offered interviews, that accommodation is available for applicants with disabilities during the interview processes.
- If an applicant requests accommodation, Gannett Fleming will consult with the applicant to determine the appropriate means of accommodation.
- Gannett Fleming will include, in offer letters made to successful job candidates, notice of its policies concerning accommodation of employees with disabilities as well as information on where and how to obtain copies of such policies, including in accessible formats.

Accommodation Information

Gannett Fleming will ensure that any employee with a disability, who makes a request to Human Resources, will receive information (whether or not in writing, verbally communicated or in electronic form) in a format that is accessible or that provides communication supports to the employee. Information for the purpose of this policy includes:

- information that is required for an employee to do the job for which he/she were hired; and
- any other information that is generally available to employees in the workplace.

Gannett Fleming will inform our employees of the policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that takes into account an employee's accessibility needs due to disability, by:

- on request, consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance in accessing workplace information, and how such individualized accommodation may be provided; and
- providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.

Individual Accommodation Plans

Gannett Fleming will develop and put in place a process for the creation of documented individual accommodation plans for those employees with disabilities. This process shall be implemented by:

- Considering how employees with disabilities will participate in the development of their accommodation plan and what the plan may include. Employees will be able to participate in the development of the individualized accommodation plan by (a) advising Gannett Fleming of the limitations brought about by the nature of the disability; (b) suggesting methods of accommodating those limitations; and (c) providing medical support for any accommodations requested. Employees will be able to participate in the development of the individual accommodation plan by meeting with a member of management or Human Resources in person at a mutually convenient time or by providing written comments to management or Human Resources. Please note that Human Resources may require an employee to provide medical support for accommodations requested and/or a meeting in person in order to canvass options for accommodation.
- Gannett Fleming will support the ongoing assessment of employees for the purpose of individualized accommodations with reference to any medical information provided by the employee and any medical information requested based upon objective observations and criteria that may necessitate an initial or ongoing physical or mental assessment.
- Gannett Fleming may request an independent medical examination to assist in the accommodation process. Any request for an independent medical examination will be made in writing and the cost of the examination will be borne by Gannett Fleming or its insurer, as the case may be.
- Employees can request the participation of another representative from the workplace in any such meetings.
- An employee's privacy, as it relates to any personal information disclosed as a result of the need for an individualized accommodation plan will be safeguarded. Human Resources will keep any information disclosed in the offices of Human Resources and will not share that information (except as required to implement the individual accommodation plan, including with medical consultants retained by Gannett Fleming) with any third party without the consent of the employee.
- Individualized accommodation plans will be reviewed once every two years or upon the provision of new, objective medical information that necessitates an earlier review. Human Resources will undertake the review and will consult with the employee if it determines that amendments to the plan are required. An employee can request a review of the individualized accommodation plan at any time, understanding that such requests must be objectively necessary and based upon a change in the employee's accommodation needs, the workplace duties being assigned and/or the physical layout of the workplace.
- In the event that a request for an individualized accommodation plan is denied (in whole or in part, including requests to amend the plan), Gannett Fleming will notify the employee in writing and, with reference to the employee's disability, provide the employee with alternate notification in a manner that takes into account the employee's disability.
- Individualized accommodation plans will be provided to an employee in writing and, with reference to the employee's disability, in an alternate format that takes into account the employee's disability.
- Individualized accommodation plans can include any information regarding accessible formats and communication supports that are required and that have been provided, upon the request of the employee, the individualized workplace emergency response information, if that information exists and may identify other accommodations that have been provided to an employee.

Individualized accommodation plans will include any:

- information regarding accessible formations and communication supports provided;
- individualized workplace emergency response information; and

- other accommodation that is to be provided.

Return to Work Process

Gannett Fleming is committed to returning employees who have been absent from the workplace to work, with or without accommodation, at the earliest opportunity. To do so, Gannett Fleming has developed the following return to work process:

- an employee who makes a request to return to the workplace after a period of disability, will be returned to work (with or without accommodations) at the earliest opportunity;
- Gannett Fleming reserves the right to require an employee to provide objective medical information confirming his or her ability to return to work;
- Gannett Fleming will implement its individualized accommodation plan policy for any employee who requires accommodations upon his or her return to work; and
- Gannett Fleming will allow the employee to provide input into his or her return to work plan, subject at all times to the right of Gannett Fleming to request objective medical information in support of a particular request.

Accessibility Needs Considered

Gannett Fleming will ensure that it takes into account the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management process by:

- reviewing individual accommodation plans to understand employee needs and determine whether they should be adjusted to improve job performance;
- taking into account the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans in assessments of performance;
- providing performance-management related documents in accessible formats; and
- providing informal and formal coaching and feedback in a manner that takes into account an employee's disability.

Gannett Fleming will take into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment, as those terms are understood in the AODA. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

IX. Other Accessibility Issues

Design of Public Spaces

At the present time, Gannett Fleming does not plan on developing or redeveloping any of its public spaces, as defined in the Design of Public Spaces Standard. However, should it choose to do so, this policy and plan will be revised to include the requirements thereunder and how we will achieve compliance.

Gannett Fleming will continue to review, and if necessary, redevelop or renovate any of its public spaces in accordance with the accessibility standards.



In further pursuit of our commitment to meeting the communication needs of people with disabilities, Gannett Fleming works closely with its IT department to ensure that existing websites and web content will conform with WCAG 2.0 Level AA and will develop timelines to assist in the conversion of existing websites and web content.

X. Going Forward

Gannett Fleming will endeavour to identify and remove accessibility barriers going forward. This accessibility plan will be reviewed and updated at least once every five (5) years to ensure compliance with legislated deadlines, address existing accessibility barriers and plan for the removal and prevention of any future barriers.

A review will be conducted more frequently in the event of legislative changes or any changes to the work or the workplace that necessitates an earlier review.

CONTACT INFORMATION AND FEEDBACK PROCESS

For more information on this accessibility policy and plan, or to report a complaint, please contact **Heather Eickhoff, Director, Human Resources at 717-763-7212 or heickhoff@gfnet.com**. **Accessible formats of this document will be made available free upon request from Heather Eickhoff.**