

Accessibility Standards for Ontarians with Disabilities Act (AODA) Integrated Accessibility Standards Regulation

Integrated Accessibility Standards Policy

This Integrated Accessibility Standards Policy has been created to meet the requirements of the Integrated Accessibility Standards Regulation set forth under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

The *IASR* creates standards to attend to barriers that persons with disabilities face in the areas of information and communications, employment, transportation and buildings. Certain terms used within this Policy are defined within **Schedule “B” (attached)**.

Purpose

The purpose of this Policy is to define the requirements and process for compliance with the *IASR* by GNC Canada.

Application and Scope

This Policy applies to persons dealing with the public on behalf of the General Nutrition Centers Canada (GNC), whether the person is an employee, whether full time or part time, temporary or permanent, and all individuals paid by or under contract with GNC, including but not limited to consultants, independent contractors, vendor representatives, volunteers or other individuals.

Integrated Accessibility Standards Commitment

GNC affirms its commitment to meeting the accessibility needs of persons with disabilities in a timely manner and governs the way that GNC will achieve accessibility. GNC is committed to achieving an all encompassing culture across the organization removing barriers for persons with disabilities. Where it is not possible to remove barriers, GNC will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner. GNC is guided by the core principles of the *AODA*, including dignity, independence, integration and equal opportunity.

This Policy should be reviewed in accordance with GNC's Multi Year Accessibility Plan, which outlines the specific measures taken by GNC to achieve compliance with the requirements under the *AODA* and its regulations.

GENERAL

GNC will maintain a Multi Year Accessibility Plan outlining its phased strategy to address the current and future requirements of the *AODA* and the *IASR*. GNC will review and update the Accessibility Plan at least once every five years and will post the Accessibility Plan on its website. Upon request, GNC will provide a copy of the Accessibility Plan in an accessible format.

1. Training

GNC will ensure that training is provided on *IASR* requirements as set out in this Policy to:

- all of its employees
- all persons who participate in developing GNC's policies regarding the provision of customer services

Training will be relevant to the duties and responsibilities of GNC's employees. New employees will be trained within three months of assuming responsibilities of the position. Training records will be kept in the employee files. Training will be updated in respect to any changes to the policies and procedures relating to the *AODA*.

INFORMATION AND COMMUNICATIONS STANDARDS

1. Customer Feedback

GNC will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by arranging for the obligation of accessible formats and communications support as soon as possible upon request.

2. Accessible Formats and Communication Supports

Upon request, GNC will arrange for accessible formats and communication supports for persons with disabilities that take into account the person's accessibility needs, unless it is not technically feasible to do so and subject to any privacy or confidentiality considerations.

When an accessible format or communication support is requested, GNC will consult with the requesting person to decide on the appropriate accessible format or communication support needed and will endeavor to make this available in a reasonable amount of time and at no additional costs than the regular cost charged to other persons.

3. Accessible Websites and Web Content

GNC will ensure that its Internet websites, including web content, are in compliance with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG), initially at Level A and increasing to Level AA, except where it is not possible to do so.

EMPLOYMENT STANDARDS

Employment standards build upon existing requirements under the Ontario *Human Rights Code* in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship

1. Recruitment

GNC will advise its employees and the public about accommodation availability for applicants with disabilities in its recruitment process

2. Recruitment and Selection Process

GNC will advise applicants when they are selected to advance further in the selection process that accommodations are available upon request in relation to the resources to be used in the job selection process. If a selected applicant requests an accommodation, GNC will consult with the applicant and provide or arrange for the condition of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

3. Notice to Successful Applicants

When making offers of employment, GNC will notify the successful applicant of its policies for accommodating employees with disabilities.

4. Informing Employees of Supports

GNC will continue to inform its employees of its policies and any updates used to accommodate employees with disabilities, including policies on the condition of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees within three months after commencing employment. Personal information provided by employees will be handled in accordance with GNC's privacy policies available online at gnc.ca

5. Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, GNC will arrange to provide accessible formats and communication supports for information that is required to perform the employee's job and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, GNC will consult with the employee making the request.

6. Workplace Emergency Response Information

GNC will provide individually developed workplace emergency response information to employees who have a disability where the individually developed information is necessary. GNC must be made aware of the employee's need for accommodation due to the employee's disability. GNC will provide this information as soon as possible after becoming aware of the employee's need for accommodation. Where the employee requires assistance, GNC will, with the consent of the employee, provide the workplace emergency response information to the person designated by GNC to provide assistance to the employee. GNC will retrieve the individually developed workplace emergency response information created for the employee when the employee moves to a different location within the company when the employee's overall accommodations needs or plans are reviewed and changed. When GNC retrieves its general emergency response policies.

7. Documented Individual Accommodation Plans

GNC will maintain a written process for the creation of documented individual accommodation plans for employees with disabilities. If requested, information regarding accessible formats and communications supports needed will be included in individual accommodation plans.

In addition, the accommodation plans will include individually developed workplace emergency response information where required and will identify any other accommodation that is to be provided.

8. Return to Work Process

GNC maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process outlines the steps GNC will take to facilitate the return to work and will include documented individual accommodation plans as part of the process. This return to work process will not replace or override any other return to work process or under any other statute.

9. Performance Management, Career Development and Advancement & Redeployment

GNC will take into account the accessibility needs of employees with disabilities as well as individual accommodation plans when conducting performance management, providing career development and advancement opportunities to employees or when redeploying employees.

Reporting

GNC will file an accessibility report regarding its compliance with the *IASR* annually or at such other times as specified under the *AODA*. All filed accessibility reports will be made available to the public upon request.

Questions

If anyone has a question about this Policy or if the purpose of the Policy is not understood, an explanation will be provided by contacting us by telephone at 1-800-496-4972 or via email at AODA.cs@gnc.hq.com. Any personal information provided in the feedback process will be handled in accordance with GNC's privacy policies available online at gnc.ca

Schedule "B" - Definitions

"Accessible Formats" means formats that are an alternative to standard formats and are accessible to persons with disabilities. 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.

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

"Communication Supports" means supports that persons with disabilities may need to access information. These include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"Disability" means

- a. an 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, an 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 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
- d. a dysfunction in one or more