Accessibility Policy

Version 1.0 | June 14, 2021

Legal & Compliance – The Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") is a provincial legislation with the purpose of developing, implementing and mandating accessibility standards to achieve accessibility for Ontario persons with disabilities, with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. This policy (the “Policy”) outlines PointClickCare’s commitment to meeting requirements in accordance with the AODA.
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1 Statement of Commitment

PointClickCare is committed to maintaining an accessible environment in Ontario for persons with disabilities. We will use reasonable efforts to ensure that our policies, practices and procedures governing the provision of our services to persons with disabilities in Ontario are consistent with the following principles:

- Services are provided in a way that respects the dignity and independence of persons with disabilities;
- Persons with disabilities are able to benefit from the same services, in the same place, and in a similar way as other staff or visitors; and
- Persons with disabilities have opportunities equal to others to obtain, use and benefit from PointClickCare’s goods or services, including employment opportunities.

To facilitate this commitment, PointClickCare has established, maintained and documented this Policy and an AODA Multi-Year Plan (the “Accessibility Plan”), that is reviewed and updated at least once every five years to identify progress made in addressing barriers and will be posted on the PointClickCare website and intranet.

2 Definitions

For the purposes of this Policy:

“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 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;
- A condition of mental impairment or a developmental 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.

“Service animal” means an animal accompanying a person with disabilities where it is readily apparent that the animal is used by the person for reasons relating to his or her disability or where the person provides a letter from a physician or nurse confirming that he or she requires the animal for reasons relating to the disability. This definition includes guide dogs used by the blind or visually impaired.

“Support person” means, in relation to a person with disabilities, another person who accompanies him or her to help with communication, mobility, personal care or medical needs or with access to goods and services.
3 Application of Policy

This Policy applies to PointClickCare full-time and part-time employees, contractors, consultants, students, co-ops and interns, temporary staff members, as well as customers, guests and visitors who work in Ontario or who provide a service to Ontario customers.

4 Policy Directives

The following are mandatory requirements:

4.1 Providing Goods and Services to Persons with Disability

PointClickCare is committed to excellence in serving all people who do business with us, including persons with disabilities, and will carry out our functions and responsibilities by:

- Communicating with persons with disabilities in ways that take into account their disability.
- Serving persons with disabilities who use assistive devices. Ensuring that persons with disabilities who are accompanied by their guide dog or other service animals are permitted to enter the premises of PointClickCare with the animal and to keep the animal with them, unless the animal is excluded by law from the premises.
- Ensuring that persons with disabilities who are accompanied by a support person are permitted to enter PointClickCare’s premises with their support person. At no time will persons with disabilities who are accompanied by their support person be prevented from having access to their support person while on PointClickCare premises.

4.2 Support Persons

Person with disabilities may enter PointClickCare’s premises with a support person and have access to the support person while on the premises. In certain circumstances, PointClickCare may require persons with disabilities to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health and safety of the person with disabilities or the health or safety of others on the premises.

4.3 Service Animals

A person with disabilities may be accompanied by a guide dog or other service animal when on PointClickCare’s premises. In the event that service animals are excluded by law from the premises or a part thereof (e.g., an area where food is being prepared), PointClickCare will provide other resources or support to enable the person with disabilities to access the services and goods offered by PointClickCare.

4.4 Notice of Temporary Disruption

PointClickCare will notify the public in the event of a planned or unexpected disruption in its facilities or services usually used by persons with disabilities. This notice will include information about its
anticipated duration, and a description of alternative facilities or services, if available. Notice will be posted on the doors of the device (e.g., elevator door), or communicated by such method as is reasonable in the circumstances.

4.5 Recruitment, Assessment and Selection

PointClickCare is an equal opportunities employer. We value diversity and welcome applicants from all cultures, religions, abilities, sexual and gender identities, including all other grounds as specified in each provincial Human Rights Code. Throughout the recruitment process, PointClickCare will notify all candidates and/or employees with disabilities about the availability of accommodation.

4.6 Training for Staff

PointClickCare provides accessibility training to all employees when they join, or perform work on behalf of, PointClickCare. The training will include general and specific tips when working with customers (accessible customer service) and other individuals with disabilities, including but not limited to, assistive devices, service animals and support persons. For more information on the content of training, please refer to the AODA training course.

4.7 Individual Accommodation Plans

PointClickCare has developed and put in place a process for the creation of individual accommodation plans for those employees that have been absent from work due to a disability. This process shall be implemented by:

- considering how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
- establishing where the plans will be stored and what steps will be taken to protect the privacy of employee information; and
- determining when and how the individual accommodation plans will be reviewed and updated.

Refer to Appendix A for the Individual Accommodation Plan template.

4.8 Feedback Process

PointClickCare welcomes and appreciates receiving and responding to feedback regarding this Policy. We will receive and respond to feedback in a format accessible to you, by providing or arranging for the provision of accessible formats and communication supports upon request.

Customers who wish to provide feedback on how PointClickCare provides services to Ontarians with disabilities can provide feedback in the following way(s).

- Email us at legal@pointclickcare.com
- Call us at +1 905 858-8885
4.9 Modifications

We are committed to developing customer service policies that respect and promote the dignity and independence of persons with disabilities. No changes will be made to this Policy before considering the impact on persons with disabilities.

5 Compliance

This Policy was designed in alignment with PointClickCare’s continual compliance to the following:

- Accessibility for Ontarians with Disabilities Act (AODA)
- Ontario Human Rights Code

6 Violations

Compliance with this Policy is a mandatory requirement by all PointClickCare employees, as further specified in Section 3 above. Non-compliance with this Policy and associated standards may be subject to disciplinary action up to, and including, termination of employment.

7 Policy Administration

7.1 Policy Review Cycle

This Policy shall be reviewed by the Legal and Compliance team and be approved by the General Counsel at least once every 5 years.

7.2 Support

All questions or concerns related to this Policy should be directed to Legal & Compliance at legal@pointclickcare.com.
Appendix A: Individual Accommodation Plan Template

In accordance with Section 28 of the O.Reg. 191/11: Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11, PointClickCare has in place this written process for the development of documented individual accommodation plans for employees with disabilities (O.Reg. 191/11, s. 28 (1)).

Note: This form is to be completed by the employee, in partnership with their Manager/Supervisor, with input as needed from: Human Resources, Legal, health care professional(s), and/or specialist(s).

<table>
<thead>
<tr>
<th>Employee Information</th>
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<tbody>
<tr>
<td><strong>Full Name:</strong></td>
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<tr>
<td><strong>Manager Name:</strong></td>
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<tr>
<td><strong>Accommodation Start Date:</strong></td>
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<tr>
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**Follow-ups required?**  ☐ Yes  ☐ No
If yes, identify frequency of follow-ups:
☐ As-needed  ☐ Annually  ☐ Quarterly  ☐ Monthly  ☐ Bi-Weekly  ☐ Other:

<table>
<thead>
<tr>
<th>Accommodation Details</th>
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<tbody>
<tr>
<td><strong>Identify barriers:</strong></td>
</tr>
<tr>
<td><em>Which job requirements and related tasks require an accommodation?</em></td>
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**Recommended accommodations:** *What strategies, tools and/or technologies have been selected to remove barriers and facilitate the related task or activity?*

| Actions to Implement Accommodation: |
The goal of the Individual Accommodation Plan is to support the disability need by removing barriers and providing reasonable accommodations to support the employee in meeting the expectations of the job requirements.

The following parties have agreed to this plan: *(please sign and date)*

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<thead>
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<tr>
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</tr>
<tr>
<td><strong>Manager:</strong></td>
<td></td>
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<tr>
<td><strong>Plan Approved by (HR Personnel):</strong></td>
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<td>1.0</td>
<td>May 1, 2018</td>
<td>Heena Walia</td>
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<td>September 14, 2018</td>
<td>Natalia Bilny</td>
<td>September 18, 2018</td>
<td>Orysia Semotiuk</td>
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<td>June 8, 2021</td>
<td>Heena Walia</td>
<td>June 11, 2021</td>
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