



ruby

INTEGRATED ACCESSIBILITY STANDARDS REGULATION : STATEMENT OF COMMITMENT, POLICY AND PLAN

This policy and plan formalizes the commitment of Ruby Corporation (“**ruby**” or the “Company”) to accessibility, and outlines those steps that the Company will take to remove barriers and improve opportunities for people with disabilities through compliance with the Integrated Accessibility Standards Regulation (the “**Integrated Standard**”).

STATEMENT OF COMMITMENT:

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. **ruby** believes in integration and equal opportunity, is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

POLICY AND PLAN:

General:

- **ruby** will provide training on the requirements of the Integrated Standard and on the Ontario Human Rights Code as it relates to people with disabilities. The Company will take the following steps to ensure that training is provided to all of our employees, volunteers and those persons who develop our policies and provide goods, services or facilities on our behalf, by:
 - developing and consolidating training materials that address the requirements of the Integrated Standard, including information about achieving accessibility by 2021 and on the disability-related regulations obligations under the *Human Rights Code*;
 - reviewing the duties of those individuals that require training, and tailoring the training to be appropriate for such duties;
 - delivering the training via a method that is appropriate for the audience and the needs of **ruby**;
 - keeping a record detailing those employees that were trained and when; and
 - ensuring that new employees are trained as soon as practicable after being hired and when the Company’s accessibility policies change.
- At this time, **ruby** does not utilize kiosks. However, should the use of kiosks become a part of the Company’s business in the future, we will ensure that our employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.

Information and Communication:

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

- **ruby** ensures that our existing processes for receiving and responding to feedback are accessible to people with disabilities upon request by:
 - providing multiple methods for feedback, such as in writing or via email, telephone or in person; and
 - considering and implementing those accessible formats or communication supports required elsewhere in the Integrated Standard.
- The Company ensures that, upon request, we will provide or arrange for the provision of publicly available information that is in respect of our goods, services or facilities in an accessible format and at a cost that is not more than that charged to others by:

- consulting with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and ruby's capability;
 - providing the accessible format or communication support in a timely manner and at no additional cost; and
 - notifying the public about the availability of accessible formats and communication supports.
- **ruby** is in the process of providing its customers and clients with publicly available emergency procedures, plans or public safety information in an accessible way, as soon as practicable upon request.
 - The Company is committed to meeting the communication needs of people with disabilities and is in the process of implementing the appropriate technology to ensure that that all of its new websites and content on those sites conform with WCAG 2.0, Level A.
 - The Company will ensure that all websites and content conform with WCAG 2.0, Level AA by January 1, 2021, by:
 - liaising with our Information Technology department to determine whether the website is compliant;
 - determining whether the Information Technology department can upgrade the website and content internally, or if third party assistance is required

Employment:

- The Company is committed to fair and accessible employment practices, and will:
 - notify the public and our staff that we will accommodate people with disabilities during the recruitment process, either through our website, via a recruiter or the applicable job posting, as applicable;
 - notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be utilized;
 - consult with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and
 - notify the successful applicant of **ruby's** policies for accommodating our employees with disabilities.
- The Company will inform employees of the policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability, by:
 - consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance, and how such 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.
- The Company provides individualized workplace emergency response information to our employees with disabilities, if the disability is such that the individualized information is necessary and the Company is aware of the need for accommodation.
- **ruby** has implemented a process for the creation of individual accommodation plans for those employees that have been absent from work due to a disability. This process:
 - considers how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
 - establishes where the plans will be stored and what steps will be taken to protect the privacy of employee information; and
 - determines when and how the individual accommodation plans will be reviewed and updated.
- **ruby** has implemented a documented return to work process for those employees that have been absent from work due to a disability and require disability-related accommodation in order to return to work. This process outlines the

steps that the Company will take to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans.

- **ruby** 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 an individual's accommodation plan to understand their needs and determine whether it should be adjusted to improve job performance;
 - providing performance-management related documents in accessible formats; and
 - providing informal and formal coaching and feedback in a manner that takes in account an employee's disability.
- The Company 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. 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.

Design of Public Spaces

At the present time, ruby 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.

Going Forward:

The Company will consider accessibility in all aspects of its business and operations, and will endeavour to identify and remove accessibility barriers going forward.

For More Information:

For more information on this accessibility policy and plan, please contact: **Human Resources** at:

Telephone: **(416) 480-2334**

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