



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES, 2005
INTEGRATED ACCESSIBILITY STANDARDS POLICY

In Ontario, the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”) aims to create a more accessible Ontario by identifying and, to the extent possible, eliminating barriers experienced by people with disabilities.

The *Integrated Accessibility Standards* regulation (the “**IASR**”), enacted under the AODA, sets out obligations with respect to five accessibility standards in the areas of Information and Communications, Employment, Transportation, Design of Public Spaces, and Customer Service, in addition to certain general requirements. ITG Canada Corp. (“**ITG**”) has implemented the ITG Multi-Year Accessibility Plan, which sets out ITG’s commitment to meeting its obligations under the IASR.

ITG is further committed to ensuring that every ITG employee receives equitable treatment with respect to employment, without discrimination, and receives accommodation in a timely manner where required, in accordance with the provisions of the Ontario *Human Rights Code* and the AODA and its regulations.

Policy Statement

ITG is committed to treating all people in a way that allows them to maintain their dignity and independence. ITG believes in integration and equal opportunity. ITG is committed to meeting the needs of persons with disabilities in a timely manner, and will do so by identifying, removing and preventing barriers to accessibility and meeting accessibility standards in accordance with the AODA.

To Whom Does this Policy Apply?

This policy applies to ITG’s operations in Ontario and to all ITG’s personnel, as defined below, who perform services for ITG in the Province of Ontario.

Defined Terms

The following terms as used in this policy have the following meanings:

“ barrier ”	means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.
“ disability ”	means, (a) 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 diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, 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

	<p>other remedial appliance or device;</p> <p>(b) a condition of mental impairment or a developmental disability;</p> <p>(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;</p> <p>(d) a mental disorder; or</p> <p>(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the <i>Workplace Safety and Insurance Act, 1997</i>.</p>
“employee”	means an employee of ITG in Ontario, whether engaged on a full-time, part-time, temporary or casual basis.
“personnel”	means all ITG’s employees, contractors and volunteers in Ontario.

GENERAL STANDARDS

Multi-Year Accessibility Plan

ITG has established and implemented, and will maintain and document a Multi-Year Accessibility Plan outlining ITG’s strategy to identify and remove barriers and increase accessibility for persons with disabilities, in accordance with ITG’s obligations under the AODA.

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five (5) years, and will be posted on ITG’s website. Upon request, ITG will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

Training Personnel and Other Persons

ITG will ensure that training is provided on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code* as it pertains to persons with disabilities to:

- all ITG’s personnel;
- all persons who participate in developing ITG’s policies; and,
- all other persons who provide goods, services or facilities on ITG’s behalf.

The training will be appropriate to the duties of the personnel and such other persons.

Personnel and such other persons will be trained when changes are made to ITG’s Integrated Accessibility Standards Policy. New personnel and such other persons will be trained as soon as practicable.

ITG will keep a record of the training it provides, including the dates on which the training is provided and the number of individuals to whom it is provided.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

ITG will ensure that ITG's process for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request. ITG will notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

Upon request, ITG will provide, or will arrange to provide, accessible formats and communication supports for persons with disabilities in connection with their communications with ITG or when accessing information or documents from ITG. ITG will do so in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

ITG will consult with the person making the request in determining the suitability of an accessible format or communication support.

ITG will also notify the public via its website about the availability of accessible formats and communication supports.

EMPLOYMENT STANDARDS

Workplace Emergency Response Information

ITG will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if ITG is aware of the need for accommodation due to the employee's disability. ITG will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, ITG will, with the employee's consent, provide the workplace emergency response information to the person ITG has designated to provide assistance to the employee.

ITG will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when ITG reviews its general emergency response policies.

Recruitment, Assessment or Selection Process

ITG will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

ITG will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, ITG will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

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

Informing Employees of Supports

ITG will inform its employees of its policies (and any changes to those 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. ITG will provide this information to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, ITG will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed 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, ITG will consult with the employee making the request.

Documented Individual Workplace Accommodation Plans

ITG will maintain a written process for the development of documented individual workplace accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual workplace accommodation plans.

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

Return to Work Process

ITG will develop and have in place 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 will outline the steps ITG will take to facilitate the return to work and will include documented individual workplace accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (e.g., the Ontario *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment

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

CUSTOMER SERVICE STANDARDS

Accessibility of Services

ITG strives to communicate with customers with a disability in a manner that takes into account both the customer's disability and the customer's preferred method of communication. To the extent possible, upon request, ITG will provide all published information or communications for its customers in accessible formats or electronic/digital formats that facilitate conversion of the information or communication into an accessible format.

ITG will allow customers with a disability, where possible, to use their own assistive devices. Where a barrier prevents the use of an assistive device, ITG will endeavor to remove the barrier or make best efforts to accommodate the customer by an alternative means.

ITG will allow customers with a disability to be accompanied by a service animal and to keep the service animal with them on ITG's premises, unless excluded by law.

ITG will allow customers with a disability to be accompanied by a support person and will ensure the customers have access to their support person while on ITG's premises.

Notice of Temporary Service Disruptions

ITG will notify customers if there is a planned or unexpected disruption of a facility or service that customers with a disability usually use to access their services.

Training and Records

ITG will provide training, and ongoing training as required under the AODA, to all of ITG's personnel to whom this policy applies as well as to those persons charged with developing this policy and related procedures and practices.

Training will be provided to all ITG personnel to whom this policy applies within thirty (30) days of their start date with ITG.

ITG will maintain records of all the training provided.

Feedback

ITG will provide, or arrange to provide, a feedback process in accessible formats and communication supports, on request.

ITG will maintain a number of channels through which customers can provide their feedback, including electronically, in writing and in person.

ITG will strive to respond to all feedback received as soon as practicable, and will acknowledge the receipt of the feedback within ten (10) business days of receipt.

Notice of Availability of Documents

ITG will make its Customer Service Standards Policy available to the public and its customers upon request. ITG will notify the public and its customers on its website that the Customer Service Standards Policy is available upon request.

CONTACT FOR QUESTIONS

This Integrated Accessibility Standards Policy exists to ensure accessible service excellence to customers and employees with disabilities. Enquiries, questions or complaints in regards to this Integrated Accessibility Standards Policy should be referred to: ITG HR, 130 King Street West Suite 1040, Toronto, Ontario M5X 1B1, by telephone at: 212-588-4222 or by email to ITG_HR@itg.com