

Accessibility Policies

Owner: Senior Director, People & Culture

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1 Introduction

1.1 Purpose

Wave is committed to providing an inclusive workplace where everyone can thrive, regardless of their ability. These policies reflect our dedication to removing barriers, creating accessible environments, and ensuring equal opportunities for all employees, clients, and visitors.

2 AODA Policy

2.1 Purpose

This policy outlines Wave's commitment to complying with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and ensuring accessibility for persons with disabilities/ disabled people in our workplace, services, and communications.

2.2 Scope

This policy applies to all employees, contractors, customers, and visitors of Wave.

2.3 Key Terminology

- **Assistive Devices:** Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids.
- **Communication Supports:** Supports facilitating effective communications, including captioning, alternative and augmentative communication supports, plain language and sign language.
- **Disability:** As defined by the [Ontario Human Rights Code](#) a disability covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time. It includes physical, mental and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, mental health disabilities and addictions, environmental sensitivities, and other conditions.
- **Persons with Disabilities/ Disabled Persons:** Individuals who have a disability, as defined under the Ontario Human Rights Code.
- **Service Animals:** Animals individually trained to do work or perform tasks for the benefit of a person with a disability.
- **Support Persons:** Any persons, whether a paid professional, volunteer, family member, or friend, who accompanies an individual with a disability in order to help with communications, personal care or medical needs, or with access to services.

2.4 Training

Wave is committed to providing education to all employees on accessibility in compliance with AODA legislation and all aspects of the Ontario Human Rights Code that relate to disabilities.

Training will occur as part of employee orientation and retraining occurs as required in respect of any changes to the policy. Training records are kept up to date as per the AODA legislation.

2.5 Information & Communication

Wave is dedicated to making information and communications accessible to all. We will provide accessible formats and communication support upon request.

2.6 Assistive Devices

People with disabilities may use their personal assistive devices when accessing Wave's goods, services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

2.7 Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

2.8 Support Animals

A person with a disability who is accompanied by a support animal will be allowed to have that animal accompany them on our premises.

2.9 Accessible Customer Service

Wave is committed to providing accessible customer service. Our processes and practices will be consistent with the principles of dignity, independence, integration, and equal opportunity.

2.10 Multi-Year Accessibility Plan

Wave is committed to maintaining and regularly updating its multi-year accessibility plan to ensure it supports both customers and employees with disabilities, as required by the Accessibility for Ontarians with Disabilities Act (AODA). The plan will be publicly available on Wave's website, promoting transparency and accountability. At a minimum, the plan will undergo a comprehensive review every five years to ensure ongoing compliance with industry standards, while also addressing emerging trends

and needs. The review process will be led by the P&C Leadership Team, in collaboration with relevant stakeholders, including internal departments, to ensure the adoption of best practices.

2.11 Emergency Information

Wave will provide information about emergency procedures, plans, and safety protocols in accessible formats upon request. Additionally, Wave will work with employees to develop individualized emergency response plans where needed, ensuring the safety and well-being of all team members.

2.12 Procurement

Wave will integrate accessibility criteria into procurement processes to ensure decisions support accessibility for all users, including employees, customers, and visitors who interact with procured products or services.

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2.13 Employment

Wave strives to provide inclusive employment practices beginning with the recruitment process through the end of employment.

All job candidates are made aware of our accommodation process during the recruitment and selection process and we work collaboratively with candidates with disabilities to provide them with support and an inclusive interview process.

Wave also strives to support employees with disabilities in the workplace. When arranging suitable accommodations, Wave engages in consultations with employees, taking into account their accessibility needs. This includes collaborating with the individual making the request to assess the appropriateness of an accessible format or communication support for:

- a) Information required for the performance of the employee's job; and
- b) Information generally accessible to employees in the workplace.

Whenever there is a modification to existing policies related to job accommodation, Wave will provide updated information to our employees.

2.14 Performance Management & Development

Wave will take employees' accessibility needs into account during performance reviews, career development, and advancement opportunities, ensuring that all individuals have equitable support and opportunities for growth.

2.15 Requests for Accommodation

Wave is committed to providing accommodation to individuals with disabilities. Requests for accommodation will be handled with respect and confidentiality. Full details on Wave's accommodation policy are listed in Wave's Accommodation Policy.

2.16 Feedback

Wave encourages an open dialogue about how we can better support our employees, customers and stakeholders with disabilities. Comments, concerns or feedback can be directed to the P&C team at HR@waveapps.com.

3 Accommodation Policy

3.1 Purpose

This policy reflects Wave's commitment to creating an inclusive and accessible workplace for everyone, ensuring equal opportunities and support for all individuals.

3.2 Scope

This policy applies to all employees, contractors, customers, and visitors of Wave.

3.3 Accommodation Process

- **Request for Accommodation:** Any employee or job applicant who requires accommodation due to a protected ground under the Ontario Human Rights Code should inform their manager and their P&C and/or Talent Partner. The request can be made verbally or in writing to the accessibility@waveapps.com email.
- **Interactive Process:** Wave will engage in an interactive and collaborative process with the employee to identify and discuss accommodation needs and possible solutions.
- **Accommodation Solutions:** Reasonable accommodation solutions will be explored, which may include modifications to work duties, flexible work arrangements, changes to the physical workspace, or other adjustments. Every effort will be made to provide effective accommodation up to undue hardship.

3.4 Timely Response

Wave is committed to responding to accommodation requests promptly. The process will be completed as quickly as possible, taking into account the nature of the request and the necessary assessments.

3.5 Confidentiality and Documentation

All information related to an employee's accommodation needs and medical conditions will be treated as confidential.

All discussions, decisions, documents and actions related to accommodation will be documented by the P&C department. This documentation will be kept confidential and retained in the employee's file, only accessible to the P&C team. Employees may be required to provide documentation to P&C such as medical certificates to support their accommodation request.

3.6 Non-Retaliation

Wave prohibits retaliation against any employee who requests accommodation or raises concerns about accommodation-related matters. Retaliation is a violation of company policy and the Ontario Human Rights Code.

3.7 Training

Wave will provide training to employees and people managers on this policy and their responsibilities in the accommodation process.

3.8 Policy Review

This policy will be reviewed regularly on an annual basis to ensure its effectiveness and compliance with current laws and regulations.

Appendix A: Document Revision History

Version	Date	Author(s)	Comments
V1.0	September 24, 2024	Chantale Colacci	

Appendix B: Approvals

Role	Name	Title	Date	Signature
P&C Leadership Approval	Lydia Bowser	Senior Director, People & Culture	October 25, 2024	