

Accessibility Policy and Procedure

Providing Goods and Services to People with Disabilities

PURPOSE

Liberty Entertainment Group supports the full inclusion of persons with disabilities as set out in the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

This policy has been prepared to outline what the organization must do to comply with the regulation and with the goal of developing standards that would provide and improve accessibility for people with disabilities.

A. SCOPE

This policy governs the provision of goods and services by all employees, volunteers, agents and/or contractors who act on behalf or represent the organization.

B. POLICY AND PROCEDURE GUIDELINES

Liberty Entertainment Group shall use all reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

1. The goods or services must be provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of goods or services to persons with disabilities, and others must be integrated unless an alternate measure is necessary, to enable a person with disability to obtain, use, or benefit from the goods or services. The alternate measure may be temporary or permanent.
3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.

C. COMMITMENT

Liberty Entertainment Group at all times provides goods and services in a way that respects the dignity and independence of people with disabilities. We are committed to giving them the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers. The organization believes in integration and is committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

Liberty Entertainment Group is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. Liberty Entertainment Group understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the Human Rights Code or obligations to people with disabilities under any other law.

The organization is also committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

1. Training for Staff

We will deliver training to all persons as required by the Accessibility Standards for Customer Service, including those who participate in developing the organization's policies. The amount and format of training given will be tailored to suit each person's interactions with the customer and their involvement in the development of policies, procedures and practices pertaining to the provision of goods and services. The training, which may be conducted by completing the mandatory online module or in a classroom setting, will be provided on an ongoing basis in respect of any changes to the policies, AODA Standards, and the Human Rights Code as it pertains to persons with disabilities.

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing the organization's goods and services
- The organization's policies, practices, and procedures relating to the customer service standard.
- How to use equipment or devices that is available on the premises or offered by the organization that may help with the provision of goods and services to people with disabilities.

2. Use of Assistive Devices

We are committed to serving persons with disabilities who use assistive devices to obtain, use, or benefit from our goods and services. People with disabilities may use their own personal assistive devices. Where assistive devices are available in our buildings, our staff will be trained in how to use them.

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.

3. Use of Service Animals

We are committed to welcoming people with disabilities who are accompanied by a service animal to the parts of our premises that are open to the public and other third parties, unless the animal is excluded by law, such as in food preparation areas.

Documentation may be requested from people with disabilities, which can be provided by their regulated health professional if the service animal cannot be easily identified. The documentation must confirm that the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services, or facilities:

- Explain why the animal is excluded.
- Discuss with the customer another way of providing goods, services, or facilities.

4. Use of Support Person

We are committed to welcoming people with disabilities who are accompanied by a support person while using our services. The policy outlining the use of service animals and support persons can be made available upon request.

We are committed to:

- Consult with the person with a disability to understand their needs.
- Consider health or safety reasons based on available evidence.
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

5. Service Disruption

The organization will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The way we provide the notice will be determined by the nature of the problem. We will always try to make alternative arrangements to provide service where possible.

6. Information and Communication

When communicating or providing information or services to a person with a disability, we will do so in a manner that takes the person's disability into account. If a person with a disability needs an accessible format, or help to communicate with us, we will work with the person to provide the format or support that will meet their needs.

We will also meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

7. Feedback Process

The goal of our organization is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way our organization provides goods and services to people with disabilities can be made by in person, by phone, fax, email, other communication technology as required or by completing a Customer Feedback Form and submitting it to staff at the location or by forwarding the form to:

P: 416-542-3789

E: hr@libertygroup.com

The organization will also ensure that the feedback process is accessible by providing or arranging accessible formats and communication support upon request.

8. Notice of Availability of Documents

Liberty Entertainment Group will notify the public that documents related to accessible customer service are available upon request by posting a notice on the company website.

9. Employment

We will notify employees, job applicants, and the public that accommodation can be made during recruitment and hiring. We will notify job applicants when they are individually selected to participate in an assessment or selection process that accommodation is available upon request. We will consult with the applicants and provide or arrange suitable accommodation.

We will notify successful applicants of policies for accommodating employees with disabilities when making offers of employment. We will notify staff that support is available for those with disabilities as soon as practicable after they begin their employment. We will provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is assisting that employee during an



emergency. We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization.
- b) when the employee's overall accommodation needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees and have a written process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work.

Our performance management, career development, and redeployment processes take into account the accessibility needs of all employees.

10. Modification to this Other Policies

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

D. QUESTIONS ABOUT THIS POLICY

This policy aims to provide a framework through which Liberty Entertainment Group can achieve service excellence for people with disabilities. If anyone has questions regarding the policy, please contact:

Human Resources
416-542-3789
hr@libertygroup.com

INTEGRATED ACCESSIBILITY STANDARD POLICY AND MULTI-YEAR ACCESSIBILITY PLAN

Accessibility Plan and Policies for Liberty Entertainment Group

This accessibility plan from 2026 – 2030 outlines the policies and actions that the organization will put in place to improve opportunities for people with disabilities and meet accessibility requirements under the Accessibility for Ontarians with Disabilities Act (Integrated Accessibility Standards).

PURPOSE

Integrated Accessibility Standards Regulation (IASR) establishes accessibility standards and introduces requirements for Information and Communications, Employment, Transportation and the Design of Public Spaces. It also establishes the compliance framework for obligated organizations and applies to all public, private, and not-for-profit organizations, with at least one employee.

The Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA) both deal with accessibility but are two very different pieces of legislation. The Ontario Human Rights Code is an individual, complaint-based legislation that addresses discrimination. The IASR, created under the AODA, applies to all organizations in Ontario.

The Ontario Human Rights Code requires organizations to accommodate people with disabilities to the point of undue hardship. The IASR does not replace or affect legal rights or obligations that arise under the Ontario Human Rights Code and other laws relating to the accommodation of people with disabilities. This means that the Ontario Human Rights Code or other applicable legislation may require additional accommodation measures that go beyond or are different from the standards established by the regulations of the AODA.

SCOPE AND RESPONSIBILITIES

This plan has been drafted in accordance with the Regulation and addresses how the company achieves accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that will be followed to provide accessibility support to Ontarians with disabilities.

The requirements of the Regulation include the following five items:

- establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation
- post accessibility policy and plan on Liberty Entertainment Group website
- incorporation of the accessibility criteria and features when procuring or acquiring goods, services, or facilities

- training and other specific requirements under the Information and Communications and Employment Standards
- review and update of the accessibility plan at least once every five years

POLICY STATEMENT AND ORGANIZATIONAL COMMITMENT

Liberty Entertainment Group is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration, equal opportunity, and support the full inclusion of persons as set out in Canadian Charter of Rights and Freedoms, and the Accessibility for Ontarians with Disabilities Act, 2005.

The organization shall use every effort to ensure that we meet the needs of the people with disabilities in a timely manner and will do so by preventing, removing barriers to accessibility and meeting accessibility requirements.

Liberty Entertainment Group will complete reports as required by the Government of Ontario and maintain records demonstrating compliance with AODA requirements.

MULTI-YEAR ACCESSIBILITY PLAN

Compliance with accessibility policies

Liberty Entertainment Group is committed to complying with the accessibility policies, procedures, and requirements established by the organization. The company will make reasonable efforts to ensure that its practices are implemented, maintained, and followed by employees and other individuals acting on behalf of the organization.

A. Customer Service and Training *(Implemented and ongoing)*

Liberty Entertainment Group is committed to excellence in serving all customers including people with disabilities. The organization complied with the AODA's Customer Service Standard with the initiatives stated on the Customer Service Policy and Procedure.

The organization will provide training to employees, volunteers, and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers, and other staff members. The organization will take the following ongoing steps to ensure employees are appropriately trained:

- determine the training requirements of the IASR and the Ontario Human Rights Code as it pertains to people with disabilities and ensure it is provided to all team members, volunteers and persons developing organizational policies
- ensure training is provided to the above noted individuals as soon as practicable
- maintain training dates and the number of individuals who are trained
- ensure training is provided on any related policy changes

B. Information and Communications *(Implemented and ongoing)*

Liberty Entertainment Group is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

i. Accessible Emergency Information

The organization is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

If the organization prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

ii. Feedback, Accessible Formats and Communication Supports

The organization has a policy and process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication support upon request. In addition, in accordance with the IASR, the organization will provide or arrange for accessible formats and communication supports for persons with disabilities:

- upon request and in a timely manner that considers the persons' accessibility needs due to the disability.
- consult with the person making the request and determine suitability of an accessible format or communication support.
- notify the public about the availability of accessible formats and communication supports.

iii. Website Accessibility

The organization shall take the following steps to make its internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA.

C. Employment *(Implemented and ongoing)*

Liberty Entertainment Group is committed to fair and accessible employment practices.

i. Recruitment

We will take the following steps to notify the public and applicants that accommodation is available upon request for all aspects within the selection process.

- during the hiring process, we will advise the applicants when they are selected for an interview, that accommodation will be provided upon request
- if an applicant or successful candidate requests an accommodation, we will discuss their needs with them and make adjustments to support them
- incorporate this requirement into HR policies and make available to all employees

ii. Individual Accommodation Plan and Return to Work

The organization will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- if an employee requests for an accommodation, we will consult with the employee and arrange for the provision of a suitable accommodation that takes into account the employee's disability.
- whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

iii. Performance Management, Career Development and Redeployment

We will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if the organization is using performance management, career development and redeployment processes:

- review internal policies and procedures to ensure they are in compliance with the IASR
- take into account the accessibility needs of team members with disabilities and, as applicable, their Individualized Accommodation Plans when:
 - Assessing performance
 - Managing career development and advancement, including notification of the ability to provide accommodations on internal job postings
 - Redeployment is required

iv. Accessibility Barriers Prevention and Removal

The organization recognizes that identifying and removing barriers to accessibility is crucial to meeting the requirements of AODA as well as creating a culture of accessibility within its organization. Staff, clients, and customers as well as members of the community will be able to provide feedback and assist with the identification of barriers to accessibility.

v. Workplace Emergency Response Information

The organization will provide individualized workplace emergency response information to employees who have a disability for the four points below:

- if the disability is such that individualized information is necessary, the employer is aware of the need for accommodation due to the employee's disability.
- where the employee requires assistance, the organization will, with the consent of the employee, provide the workplace emergency response information to the person designated by the organization to provide assistance to the employee.
- review the individualized workplace emergency response information when the employee moves to a different department in the organization, when overall accommodations need, or plans are reviewed and when the employer reviews its general emergency response policies.

vi. For more information

For more information on this accessibility plan, and to receive accessible formats of this document, please contact the HR department through:

- Phone: (416) 542-3789 or Email: hr@libertygroup.com

Issue Date:	August 2023	Revision Number:	2.0
Revision Date:	August 2026	Issued by:	HR Department