

Subject: Accessibility PolicyIssued: **March 1, 2016**Replaces Issue Dated: **All prior versions****Application:** This Policy applies to all employees of Choice Properties Real Estate Investment Trust and its subsidiaries (collectively “Choice Properties” or the “Trust”)**1.0 PURPOSE**

This Policy affirms Choice Properties’ commitment to meeting the accessibility needs of persons with disabilities in a timely manner and in a way that respects their dignity, independence, and rights of equal opportunity and access.

2.0 DEFINITIONS

- a) “*Accessible formats*” – means formats that are an alternative to standard print and are accessible to persons with disabilities. Accessible formats may include, but are not limited to, large print, braille, recorded audio and electronic formats.
- b) “*Accommodation*” – means an arrangement made with, or assistance provided to, persons with disabilities, to ensure their equal access to Choice Properties’ goods, services, employment and programs. Accommodation will vary depending on the person’s unique needs.
- c) “*Barrier*” – means anything that prevents a person with a disability from accessing Choice Properties’ goods, services, employment or programs, including physical, attitudinal and technological barriers, and inadequate information or communication.
- d) “*Communication*” - means the interaction between two or more persons where information is provided, sent or received.
- e) “*Communication supports*” – means supports that facilitate effective communication, and may include plain language formats, sign language and captioning.
- f) “*Disability*” – means any degree of physical, mental, emotional, developmental or learning impairment, and includes temporary and permanent disabilities, visible and invisible disabilities (e.g. visual, hearing or mental impairment, or learning or developmental disabilities).
- g) “*Information*” – means data, facts and knowledge that exists in any format, including text, audio, digital or images.
- h) “*Mobility Aid*” - means a device used to facilitate the transport, in a seated posture, of a person with a disability.
- i) “*Mobility Assistive Device*” – means a cane, walker or similar aid.

3.0 PRINCIPLES

Choice Properties is committed to identifying, removing and preventing barriers to accessibility for persons with disabilities. We comply with applicable legal and regulatory requirements, including those set out in human rights and accessibility-related legislation. We will ensure that:

- goods, services, employment and programs are provided in a manner that respects the dignity and independence of persons with disabilities;
- information and communication is provided in accessible formats where requested; and

- accessibility is integrated into our regular workplace processes, thereby providing equal access and opportunity across all stages of the employment lifecycle for employees with disabilities.

Further to these commitments, Choice Properties' Multi-year Accessibility Plan (the "Plan"; **Appendix "A"**) outlines the Trust's phased-in strategy for identifying, removing and preventing barriers to accessibility.

- The Plan is posted on our website (www.choicereit.ca) under the "Corporate Governance" link and will be provided in alternate formats upon request.
- The Plan will be reviewed and updated at least once every five years.

4.0 ACCESSIBLE INFORMATION AND COMMUNICATION

4.1 Accessible Websites and Web Content

Choice Properties' websites and web content will conform to level A of the Worldwide Web Consortium's Web Content Accessibility Guidelines. Compliance with level AA will be in place by 2021.

4.2 Accessibility is integrated into Choice Properties' communication methods as follows:

a) Feedback

Choice Properties ensures its process for receiving and addressing feedback is accessible by providing or arranging for the provision of accessible formats and communication supports, upon request.

b) Accessible Formats and Communication Supports

Choice Properties recognizes that persons with disabilities may use alternative methods to access information or services and will upon request provide, or arrange for the provision of, information and communication in an alternative format. The Trust will consult with the person making the request in determining the suitability of an accessible format or communication support.

5.0 EMPLOYMENT

5.1 Emergency Response Plans

Choice Properties provides workplace emergency response information to its employees. An *Alternative Emergency Preparedness Plan* will be completed, and updated as required, for each employee with a disability for whom the Trust is aware that an individualized plan is necessary.

5.2 Accessibility is integrated into Choice Properties' employment-related practices as follows:

a) Recruitment

- Choice Properties notifies all internal and external job applicants, in job postings and when inviting an applicant to an interview or assessment, that accommodation is available upon request. When arranging accommodation, the Trust will consult with the job applicant to determine their specific accessibility needs.
- When an offer of employment is made, Choice Properties notifies the successful applicant of its policies for accommodating employees with disabilities.

b) Workplace

- Choice Properties informs its employees of its policies relating to accessibility for employees with disabilities, including during orientation and onboarding.
- In response to an employee's request, the Trust will, in consultation with the employee, provide or arrange for the provision of accessible formats and communication support for information that is required in order for the employee to perform his/her job and access information that is generally available to the employee in the workplace.

- Choice Properties is committed to accommodating employees' disabilities. Employees requiring accommodation should advise their Manager and/or Human Resources Business Partner (HRBP). Employees may be required to support their request with medical documentation. The Form for employees to take to their physician in this regard will be provided by the Manager or HRBP. In Ontario, the Trust will develop written individual accommodation plans for employees with disabilities.
- c) Return to Work from Disability-related Leave
 - Choice Properties maintains a documented *return to work process* outlining how the Trust facilitates the return to work of employees who have been absent from work due to a disability and require accommodation in order to return. In Ontario, the process includes the use of a written individual accommodation plan.
 - Employees should notify their Manager and/or HRBP of an impending return to work as far in advance of the return to work as possible.
- d) Performance Management and Career Development
 - Choice Properties will take the accessibility needs of employees with disabilities and individual accommodation plans into account in all performance management and career development processes.
- e) Redeployment
 - Where Choice Properties redeploys an employee with a disability, the employee's accessibility needs and *Individual Accommodation Plan* will be taken into account, so that the employee's accommodation needs are met.

6.0 CHOICE PROPERTIES' PREMISES

6.1 Choice Properties ensures that its premises, parking lots and common facilities provide ready access to all who use the facilities, including those with disabilities. By January 1, 2017 in Ontario, and as soon as practicable nationally, accessibility standards for the Design of Public Spaces when building or making major modifications to public space will be integrated into Choice Properties' premises. In the event of disruption to the accessible parts of public space, Choice Properties will notify the public of the service disruption and alternatives available. Public Spaces include but are not limited to:

- a) Outdoor Public Use Eating Areas
- b) Exterior Paths of Travel
- c) Parking; and
- d) Service Counters, Queue Guides and Waiting Areas, if applicable.

7.0 TRAINING

7.1 Accessibility is integrated into Choice Properties' training programs in Ontario as follows:

- a) Choice Properties ensures training is provided to employees and those who provide services on the Trust's behalf on the standards set by provincial legislation regarding accessibility as well as any aspect of local human rights legislation relating to persons with disabilities.
- b) Training is:
 - appropriate to the duties of the person undergoing training;
 - provided before or as soon as possible after the person commences job duties and whenever Choice Properties alters its policies or practices regarding accessibility.

8.0 REFERENCE DOCUMENTS

- Multi-Year Accessibility Plan (Appendix “A”)
- Alternative Emergency Preparedness Plan
- Individual Medical Accommodation Plan

9.0 INTERPRETATION

Responsibility for interpretation of this Policy rests jointly with the Human Resources lead and the Vice President, General Counsel & Secretary.

10.0 REVIEW

This Policy will be reviewed annually.