

Subject: Appendix “A” – Multi-Year Accessibility Plan

1.0 INTRODUCTION

Choice Properties Real Estate Investment Trust (“Choice Properties” or the “Trust”) owns, manages and develops one of Canada’s largest retail-focused property portfolios and is committed to providing, services and employment in an integrated and accessible manner that respects the dignity and independence of persons with disabilities. This *Multi-Year Accessibility Plan* is an Appendix to our **Accessibility Policy**. It outlines Choice Properties’ strategy to prevent and remove barriers to accessibility and describes the Trust’s progressive approach to meeting or exceeding applicable legal and regulatory requirements, including those set out in human rights and accessibility-related legislation. This Plan is a continually expanding and fluid document that will be updated at least every five years, as Choice Properties’ accessibility strategy evolves.

The Loblaw Accessibility Committee, comprised of members from across the Loblaw enterprise, of which Choice Properties is a member, designs, adjusts, and facilitates the implementation of the initiatives described in this Plan. The Trust will review the Committee’s membership on a continuing basis to ensure adequate representation from business units and persons with disabilities.

Choice Properties welcomes feedback in relation to this Plan, in the format most convenient to the person providing feedback. Our Accessibility Policies, *Multi-Year Accessibility Plan*, feedback and document request procedure are available under the “Corporate Governance” link on our corporate website at www.choicereit.ca.

Where this Plan specifies that documents, alternative formats or communication supports are available upon request, such requests should be directed to 416-324-7840, or in writing to Choice Properties Real Estate Investment Trust c/o Human Resources, 22 St Clair Avenue East, Suite 500, Toronto, ON, M4T 2S5.

2.0 CUSTOMER SERVICE ACCESSIBILITY

Action Taken:

The following have been implemented to date:

- Choice Properties ensures training is provided to every person who interacts with the public on the Trust's behalf, as well as to all those who are involved in the development of Choice Properties’ policies, procedures and practices governing the provision of services to the public. This training includes the purpose of standards regarding accessibility set by provincial legislation and related requirements, as well as how to communicate, interact and support persons with disabilities in ways that take the person’s disability into account. The training is delivered as soon as practical after hire and on an ongoing basis in connection with changes to Choice Properties’ policies or procedures governing the provision of services to persons with disabilities;
- Persons with disabilities are permitted to use their own assistive devices to obtain, use or benefit from Choice Properties’ sites and services;
- Persons accompanied by a service animal are permitted to enter areas of our premises that are open to the public, except in those areas in which the animal is

- excluded by law;
- Where a person with a disability is accompanied by a support person, both the person with the disability and the support person are provided equal access to our sites and services;
- Notice is provided to the public of any temporary or other disruptions to facilities or services usually used by persons with disabilities, including information about the reason for and expected length of the disruption and a description of any alternative facilities and/or services that are available;
- Choice Properties welcomes feedback about how it provides services to persons with disabilities. Members of the public may provide feedback in the manner deemed most convenient to them, including in person, by telephone, in writing, or by email or other electronic format;
- Our **Customer Service Accessibility Policy**, feedback and document request procedure is available under the "Corporate Governance" link on our corporate website at www.choicereit.ca.

3.0 EMERGENCY PROCEDURES, PUBLIC EMERGENCY SAFETY INFORMATION

Action Taken:

The following measures have been implemented by Choice Properties:

- Emergency procedures and public emergency safety information that is prepared by Choice Properties and made available to the public is made available in an accessible format or with appropriate communication supports, as soon as practical, upon request.

4.0 WORKPLACE EMERGENCY RESPONSE INFORMATION

Action Taken:

The following measures will be taken as required by Choice Properties:

- Alternative emergency preparedness plans were created and are updated, as required, for employees who Choice Properties is aware are unable to follow the standard emergency plan in their Trust work location, as a result of a permanent or temporary disability. The employee and, if the employee consents, any designated assistant(s) are provided with the alternative emergency preparedness plan;
- Alternative emergency preparedness plans are stored with the standard Emergency Plan(s) and a copy is to be provided to the employee at their work location. A copy will also be stored in the employee's secure file by HR.

5.0 ACCESSIBILITY POLICY AND MULTI-YEAR ACCESSIBILITY PLAN

Action Taken:

- Choice Properties' **Accessibility Policy** was adopted. The Policy affirms Choice Properties' commitment to meeting the accessibility needs of persons with disabilities in a timely manner and governs the way that Choice Properties will achieve accessibility;
- Choice Properties created this *Multi-Year Accessibility Plan* outlining the Trust's phased-in strategy for identifying, removing and preventing barriers to accessibility;
- The Policy and Plan are posted on our corporate website (www.choicereit.ca) under the "Corporate Governance" link and will be provided in alternate formats upon request;
- The Policy and the Plan will be reviewed and updated at least once every five years.

6.0 INFORMATION AND COMMUNICATION

Accessible Websites and Web Content: Choice Properties' new or substantially refreshed websites and web content will conform to Level A of the Worldwide Web Consortium's Web Content Accessibility Guidelines (WCAG 2.0). Choice Properties will ensure that all of its websites comply with WCAG 2.0 Level AA by 2021.

Planned Action:

- Compliance will be incorporated into all website projects.

Feedback, Accessible Formats and Communication Supports:

- Choice Properties has implemented nationally, its processes to ensure that receiving and responding to feedback are accessible, by providing or arranging for the provision of accessible formats and communication supports, upon request; and
- Upon request Choice Properties will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, in a timely manner and at no extra cost.

Planned Action:

- Choice Properties shall retain a third party service provider to convert communications and documents to alternate formats, and inform all employees who may receive or respond to feedback with information as to how to obtain alternate formats or communication supports from the service provider.
 - Feedback will be accepted directly by Human Resources at 416-324-7840, or in writing to Choice Properties Real Estate Investment Trust c/o Human Resources, 22 St Clair Avenue East, Suite 500, Toronto, ON, M4T 2S5.
- Requesting persons will be consulted as to the suitability of an accessible format or communication support.
- The public will be notified about the availability of accessible formats and communication supports by a notification on www.choicereit.ca under the "Corporate Governance" link and by at least one other method.

7.0 EMPLOYMENT

Choice Properties has implemented nationally, accessibility into Choice Properties' employment-related practices, as follows:

Recruitment:

- Reviews and, as necessary, modifies existing recruitment, assessment, and selection procedures and processes;
- Notifies all job applicants and the public that accommodation is available during the recruitment process on request, by specifying same in job postings and on the careers section of the corporate website;
- Specifies that accommodation is available for applicants with disabilities in recruitment-related materials and during scheduled interviews and assessments;
- Consults with the applicant and makes arrangements for the provision of suitable accommodation, when an applicant requests accommodation, that takes into account the applicant's needs due to disability;
- Notifies the successful applicant of Choice Properties' policies for accommodating employees with disabilities, when making an employment offer; and

- Develops and provides appropriate training to employees responsible for recruitment, assessment, selection and on-boarding to ensure these planned actions are delivered, and accommodation requests are fulfilled in an effective and timely manner.

Workplace:

- Review and, as necessary, modify existing orientation and on-boarding processes to ensure new employees is provided information about Choice Properties' accessibility policies as soon as practical after employment commences. Documentation will also be made available on Choice Properties' SharePoint;
- Develop a procedure, which may include an email notification and a posting on Choice Properties' intranet, to advise employees whenever there is a change to existing policies on the provision of workplace accommodations;
- Develop and integrate procedures for documenting and updating, as required, documented individual accommodation plans, which will provide for the method(s) by which requesting employees will be assessed and represented, how they can participate in the plan's development, and the method by which a copy of the plan will be provided to the employee in a format that takes his or her accessibility needs into account;
- Develop and provide appropriate training to Managers and employees responsible for supporting the individualized accommodation plan process, and a training schedule that will ensure the efficacy of the process on a continuing basis.

Return to Work from Disability-Related Leaves:

- Review and, as necessary, modify and document existing return to work processes for employees who have been absent from work due to a disability and require accommodation in order to return to work;
- Ensure documented individual accommodation plans comprise part of the return to work process;
- Develop and provide appropriate training to Managers and other employees responsible for supporting the return to work process for employees who require accommodation in order to return to work, and a training schedule for same that will ensure effective execution of the return to work process on a continuous basis.

Performance Management, Career Development and Redeployment:

- Review and, as necessary, modify existing performance management, career development and redeployment processes to ensure that the accessibility needs and individual accommodation plans of employees with disabilities are taken into account;
- Develop and provide appropriate training to Managers and other employees responsible for supporting or impacting performance management, career development and advancement, and redeployment processes, and a training schedule for same that will ensure compliance with the processes on a continuous basis.

8.0 CHOICE PROPERTIES' PREMISES

Planned Action:

By January 1, 2017 in Ontario, and as soon as practical nationally, accessibility will be integrated into new or redeveloped Choice Properties public spaces, as applicable, in accordance with the criteria established by Ontario's Integrated Accessibility Standards, including but not limited to the following:

- In outdoor public use eating areas, at least 20% of the tables (minimum one table) will have knee and toe clearance, have clear ground space around them, and be

- approachable by a surface that is level, firm and stable;
- Outdoor sidewalks and walkways, including associated ramps, will have a surface that is firm and stable;
- Off-street parking will include signed parking spaces and access aisles for persons with disabilities, including van accessible spaces;
- Waiting areas, in common areas, with fixed seating will include at least one seating space in which a person using a mobility aid can wait.
- Develop and implement procedures for preventative and emergency maintenance of the accessible elements in Choice Properties public spaces, as well as how to deal with temporary disruptions when accessible elements are not in working order.

9.0 TRAINING

Nationally, Choice Properties provides training to all employees and those who provide services on Choice Properties' 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.

Action Taken:

- Development and implementation of appropriate training materials;
- Provide training before or as soon as possible after the trainee commences duties and whenever Choice Properties alters its policies and practices regarding accessibility;
- Update the plan and schedule for periodic refresh training to ensure ongoing awareness and understanding;
- Retain and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.