



Hoya Canada Human Resources

Issued: July 12, 2023
Revision period: 2 Years
Latest revision: July 12, 2023

Human Resources Focus:

04-011 ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES (AODA) MULTI-YEAR ACCESSIBILITY PLAN

CONTENTS:

1. Statement of Commitment
2. Section 1
3. Section 2
4. Multi-Year Chart
5. Document Change History

PROPRIETARY INFORMATION

INFORMATION CONTAINED HEREIN IS THE PROPERTY OF HOYA VISION CARE CANADA. REPRODUCTION DISCLOSURE OR USE THEREOF IS PERMISSIBLE ONLY AS PROVIDED BY CONTRACT OR AS EXPRESSLY AUTHORIZED IN WRITING BY HOYA.

1. STATEMENT OF COMMITMENT

HOYA Vision Care Canada (“HOYA” or “the Company”) is committed to providing a barrier-free environment for our clients/customers, employees and other stakeholders who enter our premises or access our information. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and the Integrated Accessibility Standards Regulation for Information and Communications, Employment, and Transportation, and eventually, for the Built Environment.

Our organization has made a commitment to being increasingly accessible not only because it is a legal obligation, but also because it aligns with our values. We believe we have an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone.

We are committed to ensuring our organization’s compliance with accessibility legislation by incorporating policies, procedures, and training for employees. Specifically, we are committed to:

- Ensuring that employees who develop policies, hire/manage staff and/or provide goods and services to customers are aware of the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005;
- Ensuring that our employment practices including (but not limited to) recruitment, candidate evaluation, and selection provide accommodation as needed and that employees and applicants are aware that accommodation is available;
- Ensuring that our emergency response plan includes accommodations for any employee requiring it, and that these plans are available upon request;
- Ensuring that individual workplace accommodation plans are developed and implemented as required;
- Ensuring our compliance with the Customer Service Standard; and
- Ensuring our compliance with the Integrated Accessibility Standards Regulation, including the development and implementation of a multi-year plan addressing how our company intends to continually improve in terms of accessibility for all.

The multi-year accessibility plan outlines the specific steps HOYA Vision Care is taking to improve opportunities for persons with disabilities and comply with the phased-in requirements of the Regulation.

2. SECTION 1: REPORT ON MEASURES ALREADY IMPLEMENTED

HOYA Vision Care will continue to comply with the Accessibility Standards for Customer Service Regulation and continue to implement initiatives to enhance accessibility in other areas under the Integrated Accessibility Standards Regulation Standards for Employment, and Information & Communications. When the Accessibility Standards for the Built Environment becomes law, the same will apply.

This section includes a summary of the initiatives HOYA Vision Care implemented on or before March 31, 2016 and will continue to implement.

I. Standards for Customer Service.

HOYA Vision Care has met the compliance requirements set out in the Accessible Customer Service Standard Regulation by:

- i. Establishing policies, procedures and practices for providing goods and services to persons with disabilities;
- ii. For all staff that interact, or may interact, with persons with disabilities on behalf of the company, training was provided on:
 - a. The AODA and Customer Service Standard
 - b. Policies, procedures and practices for providing goods and services to persons with disabilities
 - c. Accessibility Awareness training
 - d. Customer Feedback Process
- iii. Compliance was registered via the Accessibility Compliance Reporting tool at Service Ontario's ONe-Source for Business website.

II. Emergency response and evacuation plans under the IASR Standards for Information and Communications and Employment.

HOYA incorporated accessibility considerations into its Emergency Evacuation Plan and procedures. There are currently no known persons with disabilities that require accommodation and therefore disabilities will be addressed as they become known. All new hires will be trained on the Plan and have been advised to notify the Company regarding any disability that would require special assistance during an emergency.

3. SECTION 2: REPORT ON PLANNED MEASURES TO IDENTIFY, REMOVE AND PREVENT BARRIES IN 2016-2021

This year, HOYA's accessibility plan focuses on five areas. These initiatives will support compliance with the existing Accessibility Standards for Customer Service. They will also help us enhance accessibility in the areas of Information and Communications, Employment, and the Built Environment.

I. Standards for Customer Service

Commitment

HOYA is committed to ensuring that people with disabilities continue to receive accessible goods and services, with the same quality and standards, as fully able customers beyond January 2016.

Identification of Barriers

HOYA has not identified any customers with known disabilities. Our customer feedback process has not provided us with any business case for increased efforts beyond what we are currently doing with regards to providing quality customer service to all customers. We will continue to monitor our feedback, including any information provided by our front line staff. We are committed to responding promptly and fully to remove barriers for any customer with a disability that prevents him/her from accessing our goods and services.

Planned Actions

To meet ongoing compliance with the Accessibility Standards for Customer Service Regulation requirements and removal of barriers to persons with disabilities, HOYA will:

- i. Include AODA Customer Service Standard training as part of the New Hire Orientation process;
- ii. Consider accessibility-related feedback received through all channels (correspondence, inquiries etc.) by assessing and responding to feedback as required; and
- iii. Encourage staff to consider accessibility when planning meetings and events with customers, including vendors and suppliers.

II. Standards for Integrated Accessibility: General Requirements

2.1 Accessibility Policy Statement of Commitment to IASR

The goal of the Statement of Commitment is to explicitly state how HOYA will achieve accessibility through meeting the IASR's requirements.

Identification of Barriers

People with disabilities face a range of physical and attitudinal barriers including stereotyping and prejudice.

Planned Actions

HOYA has drafted a Statement of Organizational Commitment as well as policies that address Employment and Information & Communications that will meet the IASR's requirements. The Statement of Commitment was communicated to all Employees and will be available in an accessible format upon request. The Statement will be in the Company's updated Employee Handbook.

2.2 Accessibility Plan

Commitment

HOYA will establish, implement and maintain a multi-year Accessibility Plan that outlines our strategy to prevent and remove barriers for persons with disabilities that are employed by, or engaged in any way with, our business. The Plan will be reviewed at least once every five years. We will provide the plan in an accessible format upon request.

2.3 Procurement or Acquisition of Goods, Services, or Facilities

Not required in private sector

2.4 Self-Service Kiosks

HOYA does not utilize self-service kiosks at this time. If the Company ever were to implement kiosks, accessibility features will be taken into account.

2.5 Training

Commitment

HOYA is committed to a process for ensuring that all employees receive the appropriate training that meets the requirements under the Integrated Regulation. All Ontario employees have completed the AODA & Human Rights Code Training.

III. Standards for Information and Communications

Commitment

HOYA will ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of persons with disabilities. We will make every effort to provide necessary communication support in a timely manner.

Identification of Barriers

HOYA will assess its communication methods to identify and remove barriers to information and communications with people with disabilities.

Planned Actions

To meet compliance with the Accessibility Standards for Information and Communications under the IASR requirements and remove barriers to persons with disabilities, HOYA will:

- Upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the persons accessibility needs;
- Provide the Accessibility Plan upon request and post it on the company's updated website;
- Provide our Statement of Commitment upon request, publish in the Employee Handbook and post on the updated website about accessibility and the availability of accessible formats and communication supports;
- Ensure the IT Manager is aware of, and accountable for, website accessibility requirements under the AODA;
- Ensure all websites and web content conform to WCAG 2.0 Level AA other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded) by January 1, 2021.

IV. Standards for Employment

4.1 Recruitment

Commitment

HOYA supports the expansion of its labour pool and is committed to ensuring that hiring practices allow applicants with disabilities to apply for any jobs for which they are qualified. Internal and external job postings explicitly notify any potential applicant that accommodation during the application and interview process are available.

Identification of Barriers

HOYA will assess recruitment policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

Planned Actions

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities in recruitment, HOYA Vision Care will:

- Continue the practice of advising applicants that accommodation is available.
- If the selected applicant requests an accommodation, consult with the applicant, and arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs; and
- Ensure that Hiring Managers are aware of the rights of applicants with disabilities under the Human Rights Code.

4.2 Support Information for Employees

Commitment

HOYA will ensure that information provided to employees is accessible and takes into account any individual's specific needs.

Planned Actions

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities, HOYA will:

- Keep employees up to date on changes to policies;
- Provide accessible formats and communication supports to any employee upon request; and
- Consult with the employee to provide an accessible format and communication support for information that is needed in order to perform the employee's job and information that is generally available to employees in the workplace.

4.3 Documented Individualized Plans

Commitment

HOYA is committed to the development and implementation of individualized plans (e.g., Accommodation Plan, Return to Work Plan) in order to accommodate a disability of any type, permanent or temporary.

Planned Actions

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and remove barriers to persons with disabilities HOYA will:

- Allow the employee requesting accommodation to participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Provide an individualized accommodation plan in writing to any employee with a disability;
- Include in the process the manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if and how accommodation can be achieved;
- Provide an individualized Return to Work Plan in writing for any employee who has been absent from work due to a disability and requires disability related accommodations to return to work;
- Take steps to protect the privacy of the employee's personal information;
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which it will be done;
- Provide the employee with the reasons for the denial if the individual accommodation plan is denied; and
- Include any individualized workplace emergency response information.

4.4 Performance Assessment, Career Development & Advancement, and Redeployment

Commitment

HOYA will incorporate new accessibility requirements under the employment standard to ensure that barriers in performance assessment, career development and advancement, and redeployment are eliminated.

Identification of Barriers

HOYA will assess its performance reviews, career development and advancement, redeployment programs, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

Planned Actions

HOYA will take the accessibility needs of employees with disabilities and their individualized accommodation plans into account when assessing performance and managing career development.

V. Standards for Transportations

This standard does not apply to HOYA Vision Care, Canada.

VI. Standard for Built Environment

This standard is not yet law; however HOYA Vision Care is committed to greater accessibility in and around the buildings we use. When the standard comes into force or, when possible, before that happens, we will ensure that facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.

HOYA Vision Care Canada Multi-Year Chart (2016-2021)

| Requirements / Steps | What must be done/Planned Action | Responsibility | IASR Compliance Deadline |
|--|--|-----------------|--------------------------|
| General Requirements of the Regulation | | | |
| Accessibility Policies, Practices and Procedures | <p>HOYA has developed a Statement of Organizational Commitment, as well as Employment, Information & Communications policies that address how we will achieve accessibility through meeting the requirements in the IASR.</p> <p>The Statement of Commitment has been communicated to all Employees. The other policies related to Accessibility have been drafted and will be released with the Policy Manual.</p> | Human Resources | 2014 |
| Multi-year Accessibility Plan | <p>HOYA has developed a multi-year plan outlining a strategy to prevent and remove barriers and address the current and future requirements of the AODA.</p> <p>The company has:</p> <ul style="list-style-type: none"> • assessed current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for persons with disabilities; • made the Plan available by request and, • we will review and update the plan at least once every five years. | Human Resources | 2014 |
| Training | <p>HOYA provides training on the Accessibility Policy to all employees who interact with actual and potential customers.</p> <p>All Ontario employees have been trained on the Human Rights Code as it pertains to persons with disabilities.</p> <p>We will maintain a record all training.</p> <p>Training will re-occur when there are changes to the accessibility policies.</p> | Human Resources | 2012- ongoing |
| Requirements under the Information and Communication Standard | | | |

| | | | |
|---|---|---|--------------|
| Emergency Plan | The Emergency Plan was assessed, and wording added to be inclusive of any persons with disabilities. | Health & Safety Coordinator | 2012 |
| Accessibility Policies, Practices and Procedures | The Company has committed to making information and platforms accessible to persons with disabilities. The Statement of Organizational Commitment is provided to all Employees. | Human Resources President | 2014 |
| Continuous Improvement & Feedback | HOYA is committed to assessing and reviewing the communication needs of employees and customers with disabilities and removing the barriers to communication that exist. We will provide any information in an alternate format as needed. We will use our feedback process to capture information regarding barriers and to continuously improve. Our Accessibility Policy is available upon request and employees are trained in the feedback process. When an alternate accessible format and communication support is requested, the person with a disability will be consulted. | Human Resources National Director of Customer Care | 2014-ongoing |
| Accessible Websites and Web Content | The IT Manager has taken ownership of Canadian website accessibility requirements. HOYA IT will ensure that any new website development projects undergo an AODA Web Standards Review. | IT | 2014-ongoing |
| Requirement under the Employment Standard | | | |
| Workplace Emergency Response | HOYA will provide individualized workplace emergency response information to employees who have disclosed a disability. | Human Resources Health & Safety Coordinator | 2012-ongoing |
| Assessment of Barriers in Employment | Existing policies have been reviewed to ensure barriers in employment policies have been removed. New policy addressing Information, Communications and Accessible Employment have been drafted for release with the updated Employee Handbook. | Human Resources | 2014 |
| Recruitment | The Job Posting template has been updated to explicitly state accommodations are available. | Human Resources | 2016 |
| Accessible Formats and Communication | HOYA will provide accessible formats and communication supports for information in the workplace in consultation with the employee making the request. | Human Resources Department Manager | 2016 |

| | | | |
|---|---|---------------------------------------|------|
| Documented Individualized plans | HOYA will develop a written process for developing individual accommodation plans for any employee with a disclosed disability. HOYA will develop and implement a return-to-work process for employees absent due to disabilities and who require accommodation to return to work. | Human Resources Department Manager | 2016 |
| Performance Assessment, Career Development and Advancement, and Redeployment | HOYA will take into account the accessibility needs and accommodation plans of employees with disabilities for performance management, career development and redeployment. | Human Resources Department Manager | 2016 |

Requirements under the Transportation Standard

This standard does not apply to HOYA Vision Care, Canada.

Requirements under the Built Environment Standard

This standard is not yet law. When the standard comes into force, HOYA will ensure that facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.

4. DOCUMENT CHANGE HISTORY

| Revision Date [DD/MM/YYYY] | Nature of Revision | Document Review Participants |
|---------------------------------------|----------------------------|---|
| 12/07/2023 | Document original issuance | Renata Correia, Director of Human Resources |