

Program: Accessibility for Ontarians with Disabilities (the "Program")	Effective Date: January 1, 2012
Issued by: Human Resources	Revised: January 6, 2025

SCOPE

This Program applies exclusively to full-time and part-time employees, independent contractors, agency workers or other persons of Trioquest Inc., at all Trioquest managed properties and Workplaces located in Ontario.

Should any part of or portion of this Program be disputed or conflict with any applicable laws, then the applicable laws shall prevail.

PROGRAM

Trioquest is committed to providing safe and accessible Workplaces and building environments for its employees, contractors, tenants, and where applicable, those persons temporarily entering Trioquest buildings in Ontario.

Trioquest is committed to and will take responsible and commercially reasonable steps to provide access to its premises and services in a way that respects the dignity and independence of Persons with Disabilities and to giving Persons with Disabilities equal opportunity to access its premises and services, in the same place and in a similar manner as provided to others, whenever and wherever possible.

PURPOSE

The purpose of this Program, its procedures and practices is to address the accessibility and customer service requirements set out under the **Accessibility for Ontarians with Disabilities Act (the "AODA")**

To this end, Trioquest will make reasonable efforts to ensure that:

- a) access to its buildings under management, Workplace or services for employees, Persons with Disabilities and others are integrated unless an alternative measure is necessary to allow Persons with Disabilities to access a premises or obtain, use or benefit from Trioquest's services; in such event the alternative measure may be temporary or permanent;
- b) site specific Emergency Response Plans implemented at each managed building and at all Trioquest Workplaces in Ontario are consistent with the Program and the AODA and will include necessary procedures to assist both employees and Persons with Disabilities in the event of an emergency or Workplace injury;

- c) communications with Persons with Disabilities are conducted in a manner that takes the person's Disability into account; and,
- d) Persons with Disabilities may freely use Assistive Devices, Service Animals and/or Support Persons as is necessary to access those areas within Trioest premises that are open to the public unless superseded by other legislation.

DEFINITIONS

"Assistive Devices" means:

Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).

"Disability" as defined within the **Ontario Human Rights Code**, means:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b) a condition of mental impairment or a developmental disability;
- c) a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) a mental disorder; or,
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the **Workplace Safety and Insurance Act**.

"Emergency Response Plan" means:

Building specific emergency response plans which detail the procedures to follow at a specific location in the event of a fire, earthquake, bomb threat, etc. They are typically held by the Property or Building Manager.

"Employee Record" means:

A record of Trioest employees who have, at their own discretion, identified themselves as requiring assistance in the event of an emergency. This record is to contain, at minimum, the employee's name, work location (i.e., Workplace building address, floor, etc.), a description of the assistance required and any other details that the employee wishes to disclose for the record. This record is to be held in strict confidence by Human Resources and shall only be disclosed to the respective employee's Workplace Property Manager, who shall also maintain this information in strict confidence and only include it within the respective building's Emergency Response Plan.

"Persons with Disabilities" means:

Individuals including Trioest employees who have a Disability as defined under the **Ontario Human Rights Code**.

"Readily Apparent" with regards to Service Animal means:

An animal is deemed to be a Service Animal when it is obvious by its appearance or by what it is doing (i.e. wearing a harness, saddle bags, identification card from a Service Animal training school or from the Attorney General of Ontario or assisting with opening doors or retrieving items).

"Responsible Employees" means:

Every person who deals with members of the public or other third parties on behalf of Triovest, whether the person does so as an employee, agent or volunteer.

"Service Animal" means:

An animal is a service animal for a person with a Disability, if:

- a) it is Readily Apparent that the animal is used by the person for reasons relating to his or her Disability; or,
- b) a letter is produced from a physician or nurse confirming that the person requires the animal for reasons relating to the Disability.

"Support Person" means:

Any person, whether a paid professional, volunteer, family member, or a friend, who accompanies a person with a Disability to help with communications, personal care, medical needs, or access to goods or services. Support Persons are required to adhere to the rules and regulations of the building and property and must respect the laws and rules therein.

"Workplace" means:

Any land, premises, location or thing at or upon which an employee works.

ROLES AND RESPONSIBILITIES

Triovest's Management ("Corporate")

Is committed to the responsible management of matters relating to its employees and Persons with Disabilities throughout its operations and is responsible for monitoring the implementation of the Program, the development of related procedures and practices to support Program objectives, including individual accommodation plans. Triovest is further committed to facilitating communication, funding, training and resources necessary to enforce and implement the Program, and related procedures and practices.

Human Resources

Is responsible for implementing and enforcing the Program and will:

- on a minimum basis, annually review and update the Employee Record;
- on a minimum basis, annually provide the respective employee's Workplace Property Manager with a current copy of the Employee Record; and,
- select and facilitate the implementation of, and monitor compliance with, appropriate training programs and materials to support the Program.

Accessibility Office

With respect to the AODA and this Program, the Accessibility Office is responsible for:

- receiving and reviewing Feedback (as outlined below) from employees or the public, and providing a response, when and where required, within fourteen (14) business days of receipt of the Feedback;
- investigating and addressing complaints received from both employees and the public; and,
- making recommendations or providing direction to the appropriate individuals to prevent reoccurrence of complaints or other related issues arising from the Feedback received.

Risk Management and Health & Safety Department ("Risk Management")

Is responsible for the practical implementation and monitoring of this Program, related procedures and practices and will:

- review and keep apprised of the Accessibility and Customer Service Standards under AODA and evaluate whether any updates or changes of the Program are required;
- assist HR in updating the Program, procedures and practices, as necessary; and,
- be available as a resource for questions relating to the AODA, this Program, and related procedures and practices.

General Managers/Property Managers ("Managers")

Are responsible for ensuring that this Program and related procedures and practices are implemented and complied with at each of their managed sites and their Workplace. Managers will:

- work with Human Resources to ensure the Responsible Employees receive the necessary training to assist both employees and/or other persons who have a Disability that require assistance;
- implement site specific emergency response procedures which are consistent with this Program and the AODA and which include necessary procedures to assist both employees and Persons with Disabilities in the event of an emergency or Workplace injury;
- advise Human Resources when an employee with a Disability, whether temporary or permanent, identifies themselves as requiring assistance in the event of an emergency;
- maintain in confidence on-site, an up-to-date copy of the Employee Record and in the event of an emergency, provide a copy of the Employee Record to the emergency responders upon arrival at the Triovest building;
- provide an incident/accident report to Human Resources in the event of an emergency or Workplace injury;
work with the appropriate department within Corporate Services (i.e., Human Resources, and Risk Management) in developing an appropriate response to Feedback (see below), when and where required; and,
- assist with and, where necessary, facilitate the procurement of related materials, services and resources necessary to support this Program and related procedures and practices.

All Triovest Employees

All Triovest employees working in Ontario shall review, understand and comply with this Program and all related procedures and practices at all times. Triovest employees that may require assistance in an emergency are encouraged to inform their Manager and Human Resources regarding their needs.

PROCEDURES

INDIVIDUAL ACCOMMODATION PLANS:

Triovest is committed to ensuring that employees with disabilities are provided an individual accommodation plan that allows them to work effectively, based on their individual needs. Managers, along with a member of the HR team, will meet with the employee to develop a plan in a collaborative manner, seeking assistance from outside experts if necessary. The plan will be reviewed and updated as necessary and will be made accessible to the employee in the appropriate format.

CUSTOMER SERVICE STANDARDS:

COMMUNICATION - Triovest will:

- a) take steps to communicate with Persons with Disabilities in ways that take into account their Disability;
- b) train all Responsible Employees on how to interact and communicate with persons with Disabilities;
- c) where possible, facilitate access to alternative means of communications to assist Persons with Disabilities; and,
- d) advise the public via Triovest's website that a copy of the Program will be provided, upon request.

TELEPHONE SERVICES - Triovest will:

- a) where telephones are currently available for public use, provide accessible telephone service to Persons with Disabilities;
- b) provide alternate accessible communication options where accessible telephone services are not currently provided at Triovest properties;
- c) if requested, offer assistance to Persons with Disabilities who are having difficulty accessing telephone services; and,
- d) offer to communicate with Persons with Disabilities by e-mail, or other requested and reasonably accessible forms of communication, when telephone communication is not suitable to their communication needs.

ASSISTIVE DEVICES- Triovest will:

- a) provide training to Responsible Employees who interact with the public on various Assistive Devices that may be used by Persons with Disabilities while accessing Triovest premises or services;
- b) provide training to Responsible Employees on any Assistive Devices available at the premises for use by Triovest's customers or employees; and,
- c) Take reasonable steps to ensure that all Assistive Devices that are made available by Triovest for use within our managed premises, are kept in a state of good repair and in full working order.

SERVICE ANIMALS OR SUPPORT PERSONS- Triovest will:

- a) train Responsible Employees who deal with the public on how to interact with Persons with Disabilities who are accompanied by a Service Animal;
- b) allow access to Persons with Disabilities who are accompanied by a Service Animal on the parts of our premises that are open to the public and other third parties except where a Service Animal is excluded due to other laws (i.e., Ontario Regulation 562, Health Protection and Promotion Act and the Food Safety and Quality Act or the Dog Owner's Liability Act) or when such animal becomes a threat to other persons within the premises;
- c) make available alternative means to enable Persons with Disabilities to access our premises and services where a person's Service Animal is excluded by law; and wherever possible; and,
- d) allow Persons with Disabilities who are accompanied by a Support Person to enter Triovest's premises with their Support Person. At no time, will Persons with Disabilities be prevented from having access to their Support Person while on a Triovest premises, unless otherwise prohibited by law.

NOTICE OF TEMPORARY DISRUPTION - Triovest will:

- a) provide appropriate notice in the event of a planned or unexpected disruption in the facilities or services usually used by Persons with Disabilities. This notice will include information about the reason for the disruption; and,
- b) place such notice at public entrances and/or customer service counters (e.g., customer service kiosks, concierge, front desk reception, porter's desk, security desk etc.) on the Triovest premises when a temporary disruption has or is to occur.

EMERGENCY RESPONSE PROCESS - In addition to the specific Emergency Response Plan implemented at each building which employees are to follow in the event of an emergency, with respect to the AODA and this Program:

- a) the Managers will maintain the Employee Record in confidence and bring these records to the building's fire command center (i.e., the fire panel room, concierge desk, etc.);
- b) upon arrival of any emergency responders, a copy of the Employee Record will be disclosed only to the chief emergency responder; and,
- c) in the event of an emergency, persons requiring assistance are to move to and wait in the designated safe waiting location (i.e. stairwell, etc.) (as outlined in the building's specific Emergency Response Plan) until the emergency responders arrive to assist (i.e., local fire rescue team).

For clarity, all established building emergency response procedures as set out within each building's respective Emergency Response Plans take precedence over anything outlined herein. All building specific Emergency Response Plans are to provide a "safe waiting location" to accommodate Persons with Disabilities.

TRAINING - Triovest will provide appropriate and specific training on this Program, its procedures and practices to Responsible Employees.

Triovest's training with regards to this Program will include a discussion and explanation of the following key topics:

- the purposes of the AODA and the requirements of the customer service standard
- how to interact and communicate with persons with various types of disabilities
- how to interact with Persons with Disabilities who use an Assistive Device or require the assistance of a Service Animal or a Support Person
- what to do when a Service Animal is excluded within Triovest premises due to other laws
- how to use any Assistive Devices where available at Triovest premises or otherwise that may help with the provision of accessing Triovest premises or services to Persons with Disabilities
- what to do if a person with a Disability is having difficulty in accessing Triovest's premises or services
- assisting employees and Persons with Disabilities in the event of a Workplace incident/accident and emergency response procedures

Resources:

- AODA Training - <https://accessforward.ca/>
- Ontario Human Rights Code - <https://www.ontario.ca/laws/statute/90h19>

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- Ontario Regulation 429/07 -AODA -
<https://www.ontario.ca/laws/regulation/070429/v8>
- Ministry of Community and Social Services -AODA - Ontario Regulation 562
Health Protection and Promotion Act -
<https://www.ontario.ca/laws/statute/90h07>
- Ontario Regulation 31/05 Food Safety and Quality Act -
<https://www.ontario.ca/laws/regulation/r05031>

FEEDBACK- Triovest will:

- a) welcome any comment, question, suggestion, complaint or request for clarification (the "Feedback") on the Program and all related procedures and practices from its employees and the public provided the Feedback is received either in writing, in person, by telephone, or by email and addressed to the Accessibility Office at:

Triovest Realty Advisors Inc.,
130 King Street West, Suite 1710,
Toronto, Ontario M5X 1E5 or;

accessibilityoffice@triovest.com or 416.362.0045;

- b) provide feedback in the same form as received, unless specified;
- c) commit to respond to all written Feedback within fourteen (14) business days of receipt, provided the written Feedback specifies in detail to whom and how the response is to be received; and,
provide a copy of this Program upon request by contacting our Accessibility Office.

MODIFICATION TO THIS PROGRAM AND RELATED PROCEDURES AND PRACTICES -

Triovest reserves the right, at its discretion, to amend, revise or replace this Program or any part thereof from time to time. Any policies of Triovest that do not respect and promote the dignity and independence of employees and Persons with Disabilities will be modified or removed.

RECORD KEEPING

Triovest will maintain accurate records of training delivered to Responsible Employees and make these training records available for inspection, as may be required from time to time.

Triovest reserves the right to review any and all policies, programs and procedures and to amend, modify, replace or discontinue these policies, programs and procedures at any time by providing notice of such change in accordance with applicable legislation.