

Accessibility Policy

Intent

Difenda Inc. is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who enter the premises, work for the company, access information provided by the company, or use the company's goods and services.

Difenda Inc. will work to break down the barriers that prevent or limit persons with disabilities from employment, receipt of goods and services, the built environment, and information and communication through the implementation of accessibility standards.

Definitions

<u>Accessible Formats</u>: Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

<u>Assistive Device</u>: A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities.

<u>Communication Supports</u>: Captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

<u>Disability</u>: The temporary, prolonged, or permanent reduction or absence of the ability to perform certain commonplace activities or roles sometimes referred to as activities of daily living.

Guidelines

Employment

Difenda Inc. will make every effort to identify, remove, and prevent barriers by developing inclusive employment procedures that support persons with disabilities with accommodations during the recruitment and selection stages, and throughout the employment life cycle.

Recruitment and Hiring

Difenda Inc. understands that improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can expand the pool of talented candidates. Upon request, the company will provide candidates with reasonable accommodations during the interview and selection process. Where an accommodation is requested, the company will consult with the applicant to arrange suitable accommodations, such as providing the application in an alternate or accessible format.

The company interview process will focus on experience and skills and will not discriminate against candidates who have a disability or require an accommodation. Difenda Inc. is committed to hiring decisions that are unbiased and based on qualifications and past experience. Successful candidates will be made aware of policies and supports for accommodations upon completion of the recruitment process.



Training and Development

Difenda Inc. recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for individuals with disabilities. The company will align training and development programs to meet the needs of employees with disabilities and provide training as soon as reasonably practicable upon the person being assigned to applicable duties. Training programs will be designed with flexibility to allow customization for the individual requirements of the employee, such as providing training materials in accessible or conversion-ready formats that take into account the need of the employee. The company will consider employee barriers when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.

Communication

Difenda Inc. will provide or arrange for accessible formats and communication supports for employees, upon request. The company will consult with the employee to determine the specific barrier and the best way to provide support. Such accessible formats and communication supports are conversion-ready and will be provided in a timely manner and at no additional cost to employees.

When communicating with or providing information to an employee who requires accommodation or assistance due to a disability, the company will ensure that all communication with the individual is completed in a manner that takes into account the individual's disability. Where an assistive device is used, the company will reasonably accommodate the use of the device.

Emergency Response

If necessary or if requested, Difenda Inc. will create individualized workplace emergency response plans for employees with disabilities. The emergency response plan will consider the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee. If an employee with a disability requires assistance from a support person during an emergency, the company will designate a fellow employee to act as such.

Customized emergency response plans will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs, or plans are reviewed; or
- The company reviews general emergency response policies.

Individualized emergency response information, including individual accommodation plans, will be provided as soon as practicable and steps will be taken to protect the privacy of the employee's personal information. Difenda will aim to provide this information within 7 business days and will communicate any changes to the timing to the employee. Employee privacy will be



protected by sharing the document only with required parties such as medical professionals and care partners. During this time employees will be provided with information related to:

- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- Emergency response information.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- 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 accommodation can be achieved and, if so, how accommodation can be achieved

Individual accommodation plans will be reviewing on a monthly basis, or earlier if required. Upon request, individual accommodation plans will be provided in accessible formats and communication supports, in a timely manner and at no additional cost.

If the individual accommodation plan is denied, the employee will be informed via writing, in an accessible format, if requested. Employees may appeal a denied individual accommodation plan to People & Culture for reconsideration within 30 days of the plan being denied. The employee may provide additional documentation to accompany the reconsideration.

Accommodation

The duty to accommodate is required of all employers, in all jurisdictions in Canada, and encompasses providing respect and dignity, individualized accommodation, integration and participation, and barrier-free designs. Difenda Inc. will provide individual accommodations to support the needs of employees with disabilities. Personalized accommodation plans will be designed to allow employees to contribute and participate in job related functions and activities to the best of their abilities. The process of accommodating individuals will take a consultative approach and is a shared obligation of the company, the employee, and any applicable professionals required to assist the employee throughout the process.

Difenda's has partnered with Organizational Solutions Inc. (OSI), to provide employees with a detailed accommodation plan that truly meets their needs. OSI will work with the employee 1:1 through an objective lens in order to provide a fair assessment of the employees needs and formulate a strong plan accordingly.

<u>Return to Work</u>

Difenda Inc. is committed to a supportive return-to-work program and will develop and implement return-to-work processes for employees who are absent from work due to a disability and require accommodations in order to return to work. The company will work with the employee to develop an individualized return-to-work plan and support the employee in the transition period by addressing any barriers. The return-to-work process will outline the steps the company will take to facilitate the employee's return to work and use documented individual accommodation plans.



Redeployment

If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, Difenda Inc. will consider redeployment by placing the employee in an alternative position within the company. The company will work with Human Resources and the employee to determine whether there is another available position. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

Inability to Accommodate

Difenda Inc. will provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would create a health and safety hazard or cause unreasonable costs for the organization.

Where a necessary accommodation is found to cause undue hardship on the organization, the company will work to find a fair and equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.

Customer Service

Access to Goods and Services

Difenda Inc. will seek to provide barrier-free access to the company's goods and services for all customers. Where barriers cannot be removed, alternate means for accessing goods or services will be provided to the best of the company's ability.

Support Persons and Service Animals

If a customer with a disability is accompanied by a support person, Difenda Inc. will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person. A customer with a disability accompanied by a service animal will be allowed access to premises that are open to the public unless otherwise excluded by law.

Communication

Difenda Inc. understands the importance of accessible digital and non-digital forms of communication and will do its best to provide accessible types of communication and information to all individuals with disabilities. Such accessible formats and communication supports will be provided upon request, in a timely manner and at no additional cost.

Service Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Difenda Inc. In the event of any temporary disruptions to facilities or services that



customers with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice.

When disruptions occur, the company will:

- Post notices in the nearest accessible entrance to the service disruption,
- Update the company website with information about the disruption;
- Contact customers with reservations or appointments; or
- By any other method that may be reasonable under the circumstances.

The company will make every reasonable effort to indicate when services will resume and suggest alternatives that can be utilized during the disruption. In some circumstances, such as in the situation of unplanned temporary disruptions or emergencies, advance notice may not be possible.

Emergency Notifications

Difenda Inc. will provide emergency and public safety information, plans and procedures, maps and warning signs at evacuation points, and any other emergency alert information, in accessible formats or with appropriate communication supports, upon request.

The company will:

- Work any individuals requesting information and to see how to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and
- If a person with a disability requires assistance from a support person in case of an emergency, make sure an employee is available to act as such.

Building Accessibility

Difenda Inc. will work to ensure that the built environment, including building interior and exterior, are designed to facilitate barrier-free access to goods or services for customers and employees. If areas of the built environment are not accessible for certain individuals with disabilities, the company will work with the individual to provide an alternate means of access.

Accessible Formats

Difenda will work to ensure that all information is provided in an accessible format where requested. Difenda has adopted the following measures to ensure accessible formats are readily available. Difenda's website has a built-in accessibility tool that allows individuals to adjust the website settings to suit their needs. These customizations include screen reader, text size and spacing, pause animations, hide images, and more. Our printed documents are also readily available in large print and electronic files. As Difenda is a remote workplace, our chosen online meeting platform is Microsoft Teams which has numerous accessibility functions available. These functions include screen and voice recording, transcribing, custom view, voice control, and more.