

Tim Hortons
Integrated Accessibility Standard Policies and Multi-Year
Accessibility Plan

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1. Purpose

Under the Accessibility for Ontarians with Disabilities Act, 2005 all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards Regulation in the areas of Employment, Information and Communications and Public Spaces for Tim Hortons in accordance with Ontario Regulation 191/11, Ontario Regulation 413/12 and with the Ministry of Economic Development, Trade and Employment's intent to "streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations". The Integrated Accessibility Standards Regulation came into force July 1, 2011.

2. Scope and Responsibilities

This plan has been drafted in accordance with the Regulation and addresses how Tim Hortons achieves accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that will be followed to provide accessibility supports to Ontarians with disabilities. Please note that while accessibility principles and efforts apply to and will be followed by all Tim Hortons locations, the specifics of this plan document apply only to locations with 50 or more employees as per the regulation.

The requirements of the Regulation include the following four items:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- Training; and
- Other specific requirements under the Information and Communications, Employment transportation Standards and Public Spaces.

3. Policy Statement and Organizational Commitment

Tim Hortons is committed and guided by the four (4) core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in Canadian Charter of Rights and Freedoms, and the Accessibility for Ontarians with Disabilities Act, 2005.

Tim Hortons shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy and accessibility plan.

4. Definitions

Below is a list of definitions in alphabetical order used in this document:

Accessible Formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Accommodation means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

Communication Supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

IAP means Individualized Accommodation Plan.

Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Internet Website means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

Maintenance of Public Spaces means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.

New Internet Website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Unconvertible means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines means the World Wide Web consortium recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines" (WCAG) 2.0.

5. General Provisions

This section covers the general requirements of the Integrated Accessibility Standards Regulation (IASR).

Multi-Year Accessibility Plan

This Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”). Tim Hortons will report annually on the progress and implementation of this plan, post the information on our website and will provide it in alternative formats upon request. This plan will be reviewed and updated at least once every five years.

Training

Tim Hortons will ensure that training is provided to all team members, volunteers third party contractors who provide goods and services on our behalf, and those that develop the organizations policies, on the requirements of the accessibility standards referred to in the Regulation and on the Human Rights Code as it pertains to persons with disabilities. If any changes are made to this policy or the requirements, training will be provided. Tim Hortons will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

In accordance with the IASR, Tim Hortons will take the following steps to ensure team members are appropriately trained:

- Determine the training requirements of the IASR and the Ontario Human Rights Code as it pertains to people with disabilities and ensure it is provided to all team members, volunteers and persons developing organizational policies;
- Utilize Head Office Training resources to determine appropriate training method and delivery for the Tim Hortons locations;
- Ensure third party contractors who provide goods, services or facilities on Tim Hortons behalf have received appropriate training;
- Ensure training is provided to the above noted individuals as soon as practicable;
- Maintain training dates and the number of individuals who are trained
- Ensure training is provided on any related policy changes

Required Legislative Compliance Date: January 1, 2015

Completion Date: In progress

6. Information and Communications Standard

Tim Hortons will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If Tim Hortons determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, we will be obligated to provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

Accessible Emergency Information

If Tim Hortons prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Required Legislative Compliance Date: January 1, 2012

Completion Date: January 1, 2012

Feedback, Accessible Formats and Communication Supports

Tim Hortons has a policy and process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request.

In addition, in accordance with the IASR, Tim Hortons will provide or arrange for accessible formats and communication supports for persons with disabilities:

- Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons;
- Consult with the person making the request and determine suitability of an accessible format or communication support;
- Notify the public about the availability of accessible formats and communication supports.

Required Legislative Compliance Date: Feedback - January 1, 2015. Accessible Formats & Communication Supports – January 1, 2016

Completion Date: In progress

Website Accessibility

Tim Hortons shall take the following steps to make its internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA:

- Ensure that any web content developed internally or externally meets the Information and Communication Standard and that content developers/vendors have the necessary expertise to develop such content;
- Ensure that by January 1, 2021 all internet website and web content backdated to 2012 conforms with WCAG 2.0 Level AA.

Tim Hortons is happy to provide the eSENTIAL Accessibility™ tool set on the Tim Hortons family of websites. The application features an array of keyboard and mouse replacement solutions (alternative input methods including a webcam-based hands-free movement tracking system) that allow guests

with physical limitations to access our website. It also includes a web page reader. The application can be rapidly downloaded and installed on a standard PC and used by anyone who has difficulty typing, moving a mouse or reading a web page.

Required Legislative Compliance Date: New Content (WCAG 2.0 Level A) – January 1, 2014
All Content (WCAG 2.0 Level AA), except for exclusions set out in the IASR - January 1, 2021
Completion Date: New Content January 1, 2014. All content in progress.

7. Employment Standard

Tim Hortons is committed to fair and accessible employment practices. The Employment Standard builds upon the existing requirements under the Ontario Human Rights Code in relation to how accessibility throughout the entire employment cycle is provided. It applies to team members and does not apply to volunteers and other non-paid individuals.

Recruitment

Tim Hortons shall take the following steps to notify team members and the public about the availability of accommodations for applicants with disabilities as follows:

- During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- If a selected applicant requests an accommodation, Tim Hortons shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;
- Notify successful applicants of the policies for accommodating team members with disabilities.

Required Legislative Compliance Date: January 1, 2016

Completion Date: In progress

Team Member Notification

- Tim Hortons shall inform its team members of its policies used to support its team members with disabilities, including but not limited to, policies on the provision of job accommodations that take into account a team member's accessibility needs due to a disability as follows:
- As required to new team members as soon as practicable after they begin their employment;
- Whenever there is a change to existing policies on the provision of job accommodations that take into account a team member's accessibility needs due to a disability.

Required Legislative Compliance Date: January 1, 2016

Completion Date: In progress

Accessible Formats and Communication Supports

Upon request, Tim Hortons will consult with a team member with a disability to provide or arrange for the provision of accessible formats and communication supports as outlined below:

- Information that is needed in order to perform the team member's job;
- Information that is generally available to team members in the workplace; and
- Consult with the team member making the request in determining the suitability of an accessible format or communication support.

Required Legislative Compliance Date: January 1, 2016

Completion Date: In progress

Individual Accommodation Plan (IAP) and Return to Work

Tim Hortons will take the following steps to develop and put in place a process for developing documented Individual Accommodation Plans and return to work plans and processes for team members that have been absent due to a disability:

- Develop an IAP that includes the following:
 - The team member's participation in the development of the IAP;
 - Assessment on an individual basis;
 - Identification of accommodations to be provided;
 - Timelines for the provision of accommodations;
 - Tim Hortons may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
 - Team members may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace not a from a bargaining agent;
 - Steps taken to protect the privacy of the team member's personal information;
 - Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
 - If denied, the reasons for denial are to be provided to the team member;
 - A format that takes into account the team member's disability needs;
 - If requested, any information regarding accessible formats and communication supports provided;
 - Identification of any other accommodation that is to be provided.

Required Legislative Compliance Date: January 1, 2016

Completion Date: In progress

Performance Management, Career Development and Advancement and Redeployment

Tim Hortons will take into account the accommodation needs and/or Individual Accommodation Plans of team members when:

- Using performance management processes;
- Providing career development and advancement information;
- Using redeployment procedures.

In accordance with the IASR, Tim Hortons will take the following steps to ensure that the accessibility needs of team members with disabilities are taken into account if we are using performance management, career development and redeployment processes:

- Review internal policies and procedures to ensure they are in compliance with the IASR;
- Take into account the accessibility needs of team members with disabilities and, as applicable, their Individualized Accommodation Plans when:
 - Assessing performance
 - Managing career development and advancement, including notification of the ability to provide accommodations on internal job postings
 - Redeployment is required

Required Legislative Compliance Date: January 1, 2016

Completion Date: In progress

Workplace Emergency Response Information

Tim Hortons shall provide individualized workplace emergency response information to team members who have a disability for the four points below:

- If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the team member's disability;
- If the team member who receives an individual workplace emergency response information requires assistance and with the team member's consent, Tim Hortons shall provide the workplace emergency information to the person designated by Tim Hortons to provide assistance to the team member;
- As soon as practicable after becoming aware of the need for accommodation due to the team member's disability;
- Review the individualized workplace emergency response information when the team member moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

Required Legislative Compliance Date: January 1, 2012

Completion Date: January 1, 2012

8. Public Spaces

Tim Hortons shall incorporate accessibility into public spaces on its premises that are newly constructed or redeveloped on and after January 1, 2017 as follows:

- We will ensure that we follow the existing requirements stated under the Design of Public Spaces

Standards (Accessibility Standards for the Built Environment) for outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking, and service related elements.

- We shall also provide maintenance and restoration of public spaces by ensuring procedures are in place for preventative and emergency maintenance of accessible elements in public spaces and that procedures are in place for dealing with temporary disruptions when accessible elements required under this section are not in working order.

Required Legislative Compliance Date: January 1, 2017

Completion Date: In Progress

9. Regulatory Requirements

An Administrative Monetary Penalties scheme is being established under the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”). The scheme will allow a director or a designate to issue an order against a person, organization or corporation to pay a penalty amount as a result of non-compliance with the AODA or the accessibility standards. The largest penalty amount that can be issued to an individual or an organization that is not a corporation is \$50,000.

Use of administrative monetary penalties will be considered an avenue of last resort when all other compliance assistance and improvement options have been exhausted

The License Appeal Tribunal will hear appeals from organizations of director’s orders, but not individual complaints. Individuals who feel their human rights have not been met would continue to complain to the Ontario Human Rights Commission.

This document is available in alternate format upon request to:

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