

Accessibility Policy

Issue Date: November 6 2023

Commitment Statement & Purpose

KingSett is committed to identifying and meeting the accessibility needs of persons with disabilities in an effective, appropriate and timely manner, and to developing an inclusive, barrier-free environment, through compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and applicable provincial human rights legislation.

The purpose of this Policy is to set out the principles that guide KingSett on our approach to accessibility for persons with disabilities through compliance with the AODA and applicable human rights legislation.

Application and Scope

This Policy applies to all KingSett employees (including persons who participate in developing KingSett’s policies), volunteers and persons who provide goods, services or facilities on behalf of KingSett.

Definitions

Terms set out in this Policy shall have the defined meaning set out in the AODA.

Requirements

1. Accessibility Policy & Commitment Statement

KingSett will maintain this Policy to describe the principles that guide our path to accessibility as an organization and identify what KingSett will do to meet the requirements of the AODA. This Policy is posted on our website. Upon request, KingSett will provide a copy of this Policy in an accessible format.

2. Multi-Year Accessibility Plan

KingSett has developed and will maintain a Multi-Year Accessibility Plan (the “Plan”) that outlines KingSett’s strategy to prevent and remove barriers from our workplace and meet its requirements under the Integrated Accessibility Standards. The Plan is outlined within this Policy and is posted on our website accordingly.

3. Provision of Service to Persons with Disabilities

KingSett will provide its services and communicate with customers, members of the public and applicable third parties to whom we provide goods and services in a manner that takes into account a person’s disability and is compliant with the AODA and applicable human rights legislation.

Currently, KingSett’s office premises are not open to the public. Where KingSett welcomes invited guests or service providers to KingSett’s offices who are accompanied by a service animal or a support person, KingSett will accommodate access to the extent permitted by law. Further, in the event of a planned or unexpected disruption in services accessed by persons with disabilities in the future, KingSett will comply with the AODA requirements in respect of notice of a temporary disruption, if applicable.

4. Training

KingSett will provide relevant and applicable accessibility and disability-related human rights training to employees, volunteers and persons who participate in the development of KingSett’s policies on accessibility.

Training will be provided as soon as practicable for existing employees and will be included as part of orientation for all new hires. KingSett will also provide training, on an ongoing basis, with respect to changes made to this Policy, if any.

Records of the training provided will be maintained and will include: (i) the dates on which training was provided and (ii) the number of individuals to whom training is provided.

Where third parties are engaged to perform services in Ontario on behalf of KingSett, we may require that such third parties provide an acknowledgment that their principals, employees, agents and volunteers receive any applicable training required by the AODA.

5. Information and Communications

Feedback:

KingSett is committed to establishing and maintaining a process for receiving and responding to feedback about accessibility for persons with disabilities. Feedback regarding accessibility issues can be made to KingSett by sending an email to kingsett-hr@kingsettcapital.com. Inquiries will be addressed as soon as practicable after receipt.

KingSett will continue to ensure that our processes for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible formats and communication supports:

Upon request, KingSett will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, including employees, in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons. KingSett will consult with the person making the request for an accessible format or communication support when determining the suitability of an accessible format or communication support. KingSett will continue to advise the public about the availability of accessible formats and communication supports with respect to its feedback processes through a notification on our company website.

Accessible websites and web content:

KingSett will ensure that any websites that our Ontario entity controls directly or through a contractual relationship that allows the Ontario entity to modify the content, including web content, on such sites, conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, except where meeting the requirement(s) is not practicable.

6. Employment

KingSett's policies and practices are intended to build an inclusive and accessible work environment that is free from discrimination and harassment on the basis of disability.

Recruitment and Hiring:

In our recruitment processes, KingSett will advise our employees and the public about the availability of accommodation for applicants with disabilities. KingSett will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used and will work with the applicant to address any requests for accommodation up to the point of undue hardship.

Informing Employees of Supports:

We will notify our employees of KingSett's policies (and any updates to those policies) for supporting employees with disabilities, including our policies regarding the provision of job accommodations that take into account an employee's accessibility needs due to disability to the point of undue hardship. This information will be provided to new hires as soon as practicable after they commence employment.

Workplace Emergency Response Information:

KingSett will provide individualized workplace emergency response information to employees with disabilities where the disability is such that individualized information is necessary and KingSett is aware of the need for accommodation. Where an employee who receives individualized workplace emergency response information requires assistance, KingSett will designate a person to provide assistance and, with the employee's consent, KingSett will provide the workplace emergency response information to such person.

KingSett will review individualized workplace emergency response information, at minimum, whenever the employee moves to a different location within KingSett, the employee's overall accommodation needs or plans are reviewed, or KingSett reviews its general emergency response policies.

Documented Individual Accommodation Plans:

KingSett will develop and maintain a written process for the development of documented individual accommodation plans for employees with disabilities. If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans. Additionally, the plans will include individualized workplace emergency response information (where required). Plans will also identify any other accommodation that is to be provided. Where an individualized accommodation plan is required, employees should contact Human Resources to engage that process.

Return to Work Process:

KingSett will develop and maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process will, as part of the process, outline the steps that KingSett will take to facilitate the return to work and will include documented individual accommodation plans. We note that this return to work process will not replace or override any other return to work process created by or under any other statute (for example, *the Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment:

KingSett will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Appendix – Multi-Year Accessibility Plan

As of the date of this Policy, KingSett has achieved compliance with the applicable provisions and requirements of the AODA. Going forward, KingSett will:

1. Continue to train employees on AODA and applicable human rights legislation as it pertains to disability matters
2. Continue to ensure compliance with web accessibility requirements
3. Monitor and respond to feedback on accessibility matters
4. Respond to accessibility-related requests, including in respect of the provision of information and communication supports and workplace accommodations
5. Continue to evolve and update our Accessibility Policy and this Multi-Year Plan based on updated rules and regulations; in addition to feedback