



ACCESSIBILITY

PURPOSE

The purpose of this policy is to outline Hines' commitment and guidelines as it relates to accessibility to our properties, in accordance with AODA.

SCOPE

The Policy and Guidelines apply to all directors, officers, principals, employees, contractors, agents and any other persons assisting or doing business on Hines' behalf. As used herein, "Hines" or "Company" refers to Hines, its affiliates and any other ventures in which Hines has an economic interest.

ACCESSIBILITY

Hines is firmly committed to ensuring equal access and participation for individuals with disabilities. Our dedication extends to treating people with disabilities in a manner that preserves their dignity and independence. We firmly believe in integration and actively strive to meet the needs of individuals with disabilities in a timely manner. To achieve these goals, we are fully committed to adhering to the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario's accessibility laws.

Compliance with Ontario Human Rights Code

Hines acknowledges that our obligations under the AODA and its accessibility standards do not substitute or limit our responsibilities under the Ontario Human Rights Code or under any other law in regards to individuals with disabilities.

Accessible Customer Service

We are committed to excellence in serving all our customers, including those with disabilities. Our accessible customer service policies align with the principles of independence, dignity, integration, and equality of opportunity for individuals with disabilities.

Training

We are dedicated to providing comprehensive training to all our staff and volunteers in accessible customer service, other Ontario's accessibility standards, and aspects of the Ontario Human Rights Code that pertain to individuals with disabilities. This training also extends to:

- All individuals involved in the development of our organization's policies.
- All other individuals who provide goods, services, or facilities on behalf of our organization.
- The training provided is tailored to the specific roles and responsibilities of our employees and volunteers and includes:
 - Understanding the purpose of the Accessibility for Ontarians with Disabilities Act (AODA) and the Customer Service Standards.
 - Familiarization with our policies related to the Customer Service Standards.
 - Interacting and communicating effectively with people with various types of disabilities.
 - Interacting with individuals with disabilities who use assistive devices or require service animals or support persons.



- Proper utilization of equipment or devices available on-site or otherwise to assist individuals with disabilities in accessing our services and facilities.
- We ensure that every individual receives this training as soon as practicable after being hired and provide updated training whenever there are changes to our policies.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing our services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, we will use other measures to ensure access for individuals with disabilities.

Communication

We communicate with people with disabilities in ways that consider their specific disability, which may include various communication methods to accommodate to individual needs.

Service Animals

Hines welcomes people with disabilities and their service animals. Service animals are allowed in all areas of our premises that are open to the public and third parties. When it is not clear that an animal is a service animal, our staff may request documentation from a regulated health professional to confirm the need for the service animal.

Support Persons

Individuals with disabilities who require support persons will be allowed to have their support person accompany them on our premises. In certain cases, Hines may require a support person to accompany a person with a disability for health or safety reasons.

Notice of Temporary Disruption

In the event of planned or unexpected disruptions to services or facilities for customers with disabilities, Hines will notify customers promptly. Notices will include information about the reason for the disruption, expected duration, and descriptions of alternative facilities or services, if available.

Emergency Response

If necessary or upon request, Hines creates individualized workplace emergency response plans for employees with disabilities.



Customized emergency response plans are reviewed under specific circumstances, including changes in the employee's physical location and accommodation needs or when reviewing general emergency response policies.

Return to Work

Hines provides a supportive return-to-work program and develops and implements return-to-work processes for employees who are absent from work due to a disability and require accommodations to return to work.

The return-to-work process outlines the steps the company will take to facilitate the employee's return to work and any individualized accommodation needs.

Redeployment

If an employee cannot be accommodated in their current position, redeployment may be considered.

The company will work with the appropriate authority and the employee to determine whether there is another available and suitable position to accommodate the employee's needs.

Feedback

Hines welcomes feedback on our accessible customer service practices, which helps us identify and address barriers and concerns. Feedback may be provided through various channels, and all feedback, including complaints, will be handled promptly and effectively.

Availability of Documents

Documents related to accessible customer service are available upon request, and we will provide them in accessible formats or with communication support as needed.

Procurement

We consider accessibility criteria and features when procuring goods, services, or facilities, including self-service kiosks, to the extent that it is possible and practical to do so.

Information and Communications

We provide information and communications to individuals with disabilities in accessible formats and communication supports upon request, considering the individual's specific accessibility needs.

Employment

Hines makes every effort to identify, remove, and prevent barriers to employment by developing inclusive procedures that support and accommodate individuals with disabilities throughout their recruitment and employment.



Whenever a candidate or employee requires accommodation to participate fully in the recruitment, selection process, or workplace, Hines works with the individual to provide such accommodation up to the point of undue hardship.

Hines notifies employees, job applicants, and the public that accommodations can be made during recruitment and hiring processes. We also inform job applicants when they are selected for assessments or selection processes that accommodations are available upon request. Hines is dedicated to providing support and suitable accommodations for employees with disabilities.

Job Design

Hines proactively conducts thorough job analyses to ensure job requirements are bona fide occupational requirements, reasonably necessary for work-related processes or tasks, and adopted in good faith. If a requirement is not bona fide, Hines evaluates reasonable accommodations.

Design of Public Spaces

Hines ensures that public spaces, including recreational trails, outdoor public eating areas, outdoor play spaces, parking facilities, and service-related elements, comply with accessibility laws, especially when building or making major changes to these areas.

Transportation

We meet accessibility laws when making our transportation services accessible to individuals with disabilities.

Definitions

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

Assistive device: Any medical device, mobility aid, communication aid, or other aid that is specially designed to assist a person with a disability with a need related to their disability.

Communication supports: Captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.



Constructive discrimination: Also referred to as adverse effect, is discrimination that unintentionally singles out a particular group, resulting in unequal treatment.

Conversion-ready: An electronic or digital format that facilitates conversion into an acceptable format.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

Mobility aid: Any manual or electric wheelchair, scooter, boarding chair, walker, cane, crutch, prosthesis, or other aid that is specially designed to assist a person with a disability with a need related to mobility.

Service animal: An animal that can be recognized by visual indicators such as a vest or harness that is being used by an individual with a disability for reasons relating to the person's disability.

Support person: Another person who accompanies an individual with a disability in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

Changes to Existing Policies

Any policies within Hines that do not align with the principles of dignity, independence, integration, and equal opportunity for individuals with disabilities will be modified or removed as necessary.

Hines is committed to fostering an inclusive and accessible environment for all individuals. This policy is publicly available, and we provide accessible formats upon request. For inquiries or feedback regarding our accessibility policy, please contact Contact Information.



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DOCUMENT – REVISIONS

REVISION #	PREPARED BY	DATE	REVIEWED BY	DATE	AMENDMENT DETAILS
001		10.22.2022			Final
