



ACCESSIBILITY

PURPOSE

The purpose of this policy is to outline Hines' commitment to providing an accessible environment, and to explain how Hines fulfills this commitment.

SCOPE

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

DEFINITIONS

Please see the Definitions page at the end of this Policy for key terms.

ACCESSIBILITY

Our Commitment to 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, 2005* (the "AODA"), including the *Integrated Accessibility Standards* regulations (the "IASR").

Accessible Customer Service

We are dedicated to excellence in serving all of our customers, including those with disabilities. We are committed to providing a barrier-free environment consistent with the principles of independence, dignity, integration, and equality of opportunity for individuals with disabilities.

Training

We provide comprehensive training to all of our staff and volunteers as required under the AODA. This training also extends to all individuals involved in the development of our organization's policies; and all other individuals who provide goods, services, or facilities on behalf of our organization.

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.

The training provided is tailored to the specific roles and responsibilities of our employees and volunteers and includes:

- The requirements of the IASR;
- The requirements of the *Human Rights Code* as it pertains to persons with disabilities;
- Understanding the purpose of the 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, including what to do if a person with a particular type of disability is having difficulty accessing our goods, services or facilities;
- Interacting with individuals with disabilities who use assistive devices or the assistance of service animals or support persons;



- Use of equipment or devices available on-site that may help with the provision of goods, services or facilities to a person with disability.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing our services or facilities. If an assistive device is prohibited by law or a barrier exists that cannot be removed despite all reasonable efforts (such as an unavoidable health or safety concern), we will make all reasonable efforts to explore alternative options.

Communication

We communicate with people with disabilities in ways that take into account their specific disability.

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

A person with a disability who is accompanied by a support person will be allowed to have that 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.

Information and Communications

Upon request and in a timely, we provide communications supports and information and communications in accessible formats to individuals with disabilities, taking into account their accessibility needs. We do so at a cost that is no more than the regular cost charged to other persons.

In the event it is not technically feasible or the technology is not readily available, such that information or communications are not convertible to an accessible format, the requesting individual will be provided with a reason why and a summary of the unconvertible information or communications.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption 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. This notice will



be posted on the entrance door or any other reasonable alternative in the particular circumstance.

Emergency Response

If necessary and upon request, Hines will provide individualized workplace emergency response plans for employees with disabilities. Individualized response plans are reviewed in the event the employee's physical location in the organization changes, their accommodations needs/plans are reviewed, and when we review our general emergency response policies.

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. Hines takes into account the accessibility needs of employees with disabilities when in performance management and career development.

A. Accommodation

Hines notifies employees, job applicants, and the public that accommodations can be made during recruitment and hiring processes upon request.

When 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.

B. 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 disability-related accommodation 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.

C. Redeployment

In the event Hines uses redeployment, the Company will take into account the accessibility needs of employees with disabilities and individual accommodation plans.

D. 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.

**Procurement**

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

Service Counters and Waiting Areas

If Hines constructs new service counters or waiting areas, it will comply with the requirements under the “Obtaining Services” Part of the AODA.

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.

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.

Policy Available In Accessible Formats

Hines is committed to fostering an inclusive and accessible environment for all individuals. This Accessibility Policy is publicly available, and we provide accessible formats upon request. Please contact Guest Experience Team at 647-905-5966.

Feedback

Hines welcomes feedback on our accessible customer service practices, which helps us identify and address barriers and concerns. Feedback may be provided through Guest Experience Team at 647-905-5966. All feedback, including complaints, will be handled promptly and effectively.

Definitions

“**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.

“**Assistive device**” means any medical device, mobility aid, mobility assistive device communication aid, or other aid that is specially designed to assist a person with a disability with a need related to their disability.



“Barrier” means anything that prevents a person with a disability from fully participating in our business because of his or her disability, including a physical barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, or a policy or practice.

“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.

“Disability” means 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, 1997.

“Mobility aid” means a device used to facilitate the transports, in a seated posture, of a person with a disability.

“Mobility assistive device” means a can, walker or similar aid.

“Service animal” means an animal that can be readily identified as one being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal or; the person provides documentation from one of the regulated health professionals listed in the *Integrated Accessibility Standards*, confirming the person requires the animal for reasons relating to the disability.



“Support person” means 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 or facilities.



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DOCUMENT – REVISIONS

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