

Entrust HR Policy		
Accessibility at Entrust	Document Version	2.0
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	Region	Ontario, Canada

1. Policy Statement

Entrust Limited (“Entrust Canada”) is committed to ensuring equal access and participation for people with disabilities. This includes providing an accessible working environment for our employees. We are committed to treating people with disabilities, whether visible or invisible, with courtesy and in a way that allows them to maintain their dignity and independence.

We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

Entrust Canada is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

2. Intent

This policy is intended to meet the requirements of the Integrated Accessibility Standards (“IAS”), O. Reg. 191/11 under the AODA. The provision of all goods and services, information and communications and employment by Entrust Canada shall follow the principles of dignity, independence, integration and equality of opportunity for people with disabilities.

3. Scope

- This policy applies to the provision of goods and services, not the goods themselves, at premises owned and operated by Entrust Canada.
- This policy applies to employees, agents and/or contractors of Entrust Canada who deal with the public, or other third parties who act on behalf of Entrust Canada, including when the provision of goods and services occurs off the premises of Entrust Canada.
- This policy shall also apply to all persons who participate in the development of Entrust Canada’s policies, practices and procedures governing the provision of goods and services to members of the public or to third parties.

4. Definitions

Assistive Device: is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

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

Disability: the term disability refers to the following, as defined by the AODA and the *Ontario Human Rights Code*:

- (a) 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 co-ordination, 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*.

Support Person: as reflected in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs or access to goods and services.

5. General Principles

This Policy addresses the following:

- 5.1. The Provision of Goods and Services to Persons with Disabilities
- 5.2. The Use of Assistive Devices
- 5.3. The Use of Guide Dogs, Service Animals and Service Dogs
- 5.4. The Use of Support Persons
- 5.5. Notice of Service Disruptions
- 5.6. Feedback Process
- 5.7. Training
- 5.8. Notice of Availability and Format of Required Documents

5.1 The Provision of Goods and Services to Persons with Disabilities

Entrust Canada will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account a customer's disability.

5.2 Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Entrust Canada. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access to goods and services. For example, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

5.3 Guide Dogs, Service Animals, and Service Dogs

This section of this policy applies only to the provision of goods and services that take place at premises owned and/or operated by Entrust Canada.

We welcome people with disabilities and their service animals. A customer with a disability who is accompanied by a guide dog, service animal or service dog (as those terms are defined by applicable laws and regulations) will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas: A customer with a disability who is accompanied by a guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act*, Ontario Regulation 562 Section 60.

Exclusion Guidelines: If a guide dog, service animal or service dog is excluded by law (see applicable laws below) Entrust Canada will explain why the animal is excluded and take reasonable steps to offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws:

- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- The Health Protection and Promotion Act, Ontario Regulation 562 Section 60
- Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, Entrust Canada may request verification from the customer. Verification may include:

- a letter from a physician, nurse or other recognized professional medical practitioner, confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal: A customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies: If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Entrust Canada will make all reasonable efforts to meet the needs of all individuals.

5.4 Support Persons

If a customer with a disability is accompanied by a support person, Entrust Canada will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to their support person.

There may be times when seating and availability prevent the customer and support person from sitting beside each other. In these situations, Entrust Canada will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer and/or other appropriate steps taken (e.g., securing a non-disclosure agreement), prior to any disclosure of confidential information in the presence of the support person.

In very limited situations and where there is no other available option, Entrust Canada may require a support person to accompany a person with a disability. The decision to require a support person will be made after consulting with the person with a disability to understand their needs, considering health or safety reasons based on available evidence, and reviewing other reasonable ways to protect the health or safety of the person or others on the premises.

5.5 Notice of Disruption in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Entrust Canada. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Entrust Canada's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications Will Include: In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notification Methods: If disruptions occur, Entrust Canada will provide notice by:

- posting notice in conspicuous places, including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Entrust Canada website;
- contacting customers with appointments or meetings;
- verbally notifying customers when they are making an appointment or while they are at an Entrust Canada facility; or
- by any other method that may be reasonable under the circumstances.

5.6 Feedback Process

Entrust Canada shall offer customers an opportunity to give feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers upon request. Feedback forms, along with alternate methods of providing feedback, such as verbally (in person or by telephone) or in writing (handwritten, delivered, website or email), will also be available upon request by emailing accessibility@entrust.com. In addition, reports or complaints can be made by any person via Entrust's ethics hotline, available at: <https://www.entrust.com/legal-compliance/policies/ethics>. Entrust Canada will respond to feedback, including complaints, in an appropriate manner, including where necessary via a reasonable alternate communication method requested by a customer with a disability.

5.7 Training

Entrust Canada is committed to training all employees and contractors in accessible customer service, Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

Training will be provided to:

- all employees, agents and/or contractors who deal with the public or other third parties that act on behalf of Entrust Canada;
- those who are involved in the development and approval of customer service policies, practices and procedures.

Training will cover the purposes of the AODA and the customer service requirements, including the following:

- Purpose of the AODA and the requirements of the Customer Service Standards
- Our policies related to the Customer Service Standards
- How to interact and communicate with persons with various types of disability;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability;
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

Training Schedule: Entrust Canada will provide training as soon as practicable to new employees, agents and/or contractors who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training: Entrust Canada will keep a record of all individuals who complete the training, including the date the training was completed.

5.8 Notice of Availability of Support Documents

Entrust Canada shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Entrust Canada, its website and/or any other reasonable method.

6. Information and Communications

Wherever Entrust Canada has existing processes for receiving and responding to feedback, we will provide or arrange for the provision of accessible formats and communication supports upon request in order to ensure that all such processes are accessible to people with disabilities.

We communicate with people with disabilities in ways that take into account their disability. When asked, we will take reasonable steps to provide information about our organization and its services, including public safety information, in accessible formats or with communication supports in a timely manner, taking into account the person's accessibility needs due to disability; and at a reasonable cost if any.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

Entrust is committed to making our products and services reasonably accessible to disabled individuals, and we follow the Web Content Accessibility Guidelines (WCAG) in accordance with applicable law.

Our efforts to provide access to Entrust's externally facing digital content are ongoing as our website grows and changes. If you have any questions or concerns regarding your ability to access Entrust's goods and services, we welcome and encourage you to contact us at <https://www.entrust.com/contact/support>.

7. Employment

Entrust Canada is committed to creating a work environment where everyone feels included, respected and comfortable with being themselves. We're fostering a work environment where all our employees feel accepted, valued and included.

As part of our accessibility program, our internal policies and procedures help ensure our employees and candidates are well informed of the various types of support and resources available, including the following:

- Process to request accommodation
- Support and individualized accommodation plan for employees and applicants with disability and accessibility needs
- Accessible formats and communication supports
- Individualized workplace emergency response information
- Return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations.

We are committing to removing barriers and providing equal access to employment. A member of the Human Resources team will work with applicants who request a reasonable accommodation during the application process. All information shared during the accommodation request process will be stored and used in a manner that is consistent with applicable laws and Entrust Canada policies. To request a reasonable accommodation in the application process, individuals may contact accessibility@entrust.com.

Entrust Canada will notify job applicants who are 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.

8. AODA Compliance

In addition to the terms of this policy, any specific employment or workplace requirements of Ontario Regulation 911/11, AODA or other Regulations to AODA not referenced in this policy, apply to and shall be satisfied by Entrust Canada, as applicable.

9. Exceptions

Any exceptions to this policy require the advance written approval of the Chief Human Resources Officer.

- Entrust reserves the right to amend, modify, suspend or terminate all or any part of its benefit programs, at any time and for any reason.
- It is intended that all aspects of this policy shall comply with the provisions of the applicable employment standards legislation, which provisions as they may from time to time be amended, are deemed to be incorporated herein and shall prevail if greater. In the event that any employee entitlements under such applicable employment standards legislation exceed the provisions of this policy, then those entitlements shall replace the said provisions.

10.0 Owner / Contact Information

If you have any question about this Policy, please contact the Policy Owner:

Dean Cullen
Sr. Manager Product Support

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Beth Klehr	Chief Human Resources Officer	12-DEC-2023

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1.1	25-Oct-2018	Updates to include IASR reference	Human Resources
2.0	12-Dec-2023	Updates to include Human Rights Code references and general language updates	Human Resources