

Accessibility Policy

Intent

This policy is intended to outline practices and procedures in place at OUTFRONT Media Canada LP (OUTFRONT Canada) to meet the requirements established by provincial accessibility legislations. This policy establishes OUTFRONT Canada's accessibility standards for customer service, information and communication and employment.

Scope

- a) This policy applies to the provision of accessibility for persons with disabilities at premises owned and operated by OUTFRONT Canada.
- b) This policy applies to employees, volunteers or other third parties that act on behalf of OUTFRONT Canada, including when the provision of accessibility for persons with disabilities occurs off the premises of OUTFRONT Canada.
- c) The section of this policy that addresses the use of service animals only applies to the provision of accessibility for persons with disabilities that take place at premises owned and operated by OUTFRONT Canada.
- d) This policy shall also apply to all persons who participate in the development of the OUTFRONT Canada's policies, practices and procedures governing the provision of accessibility for persons with disabilities to members of the public or third parties.

Definitions

Accessible Formats – means, but is not limited to, any form of large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Accommodation – means providing continuum of assistive responses to a request from a disabled person to improve access to services or employment. This continuum includes such simple responses as providing additional time to review material, to moving furniture to manage wheelchair access, to permitting entry of a service animal or to providing specialized or modifying equipment for employment purposes.

Assistive Device – means a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of persons with disabilities. Personal assistive devices are typically devices that persons with disabilities use such as a wheelchair, walker or a personal oxygen tank to facilitate hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Customer – means the subset of the public or third parties to whom OUTFRONT Canada provides services in the ordinary course of our business.

Communication Support – means, but is not limited to, captioning, alternative and augmentative communication support, plain language, sign language and other support that facilitate effective communications.

Disability – as defined by *provincial accessibility legislations* and *Human Rights Codes*, 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 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under provincial workers compensation boards.

Service Animal – means any animal used by a person with a disability for reasons related to the disability, where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person – means a person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, medical needs.

Web Content Accessibility Guidelines – means the World Wide Web Consortium Recommendation, dated December 2008, entitled *Web Content Accessibility Guidelines (WCAG) 2.0*.

Web Page – means a non-embedded resource obtained from a single Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent.

Policy Statement

OUTFRONT Canada is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under provincial accessibility legislations. OUTFRONT Canada respects and supports applicable provincial Human Rights Codes.

General Principles

1.0 Accessible Customer Service

1.1 Provision of Goods and Services

OUTFRONT Canada will ensure that all persons with disabilities receive the same value and quality, allowing persons 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.

OUTFRONT Canada will use alternative methods when possible to ensure that persons with disabilities have access to the same services, in the same place and in a similar manner.

OUTFRONT Canada will take into account individual needs when providing goods and services.

1.2 Communication

OUTFRONT Canada will communicate with persons with disabilities in ways that take into account their disability and enable them to communicate effectively for purposes of using, receiving and requesting OUTFRONT Canada goods and services.

OUTFRONT Canada will train its employees on how to interact and communicate with persons with various types of disabilities.

1.3 Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services, or premises of OUTFRONT 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 of goods and services, or premises. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a person with an oxygen tank may involve ensuring the person is in a location that would be considered safe for both the person and business.

It is the responsibility of the person with a disability to ensure that his/her assistive device is operated in a safe and controlled manner at all times.

OUTFRONT Canada will ensure that its employees are familiar with the use of assistive devices available on OUTFRONT Canada's premises, as appropriate to their duties, and inform persons with disabilities of the assistive devices that are available.

1.4 Use of Service Animals

A person with a disability that is accompanied by a service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to service animals.

Exclusion Guidelines:

If a service animal is excluded by law (see applicable laws below), OUTFRONT Canada will offer alternative methods to enable the person with a disability to access goods and services, or premises when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

If there is a conflict between a provision of a provincial animal liability act or of a regulation relating to banned breeds (such as pitbulls) 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 Service Animal:

If it is not readily apparent that the animal is being used by the person with a disability for reasons relating to his or her disability, OUTFRONT Canada may request verification from the person with a disability.

Verification may include:

- a letter from a physician or nurse 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 service animal training school.

Care and Control of the Animal:

The person with disabilities that is accompanied by a 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, OUTFRONT Canada will make all reasonable efforts to meet the needs of all individuals.

1.5 Use of Support Persons

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

OUTFRONT Canada may require a person with a disability to be accompanied by a support person when on its premises in the event that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on its premises.

In situations where confidential information might be discussed, consent will be obtained from the person with a disability, prior to any conversation where confidential information might be discussed.

Admission Fees:

If payment is required by a support person for admission to a sponsored event, OUTFRONT Canada will ensure that notice is given in advance by posting notice of admission fees for support persons where OUTFRONT Canada fees are posted.

1.6 Notice of Temporary Service Disruptions

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of OUTFRONT Canada. In the event of any temporary disruptions to services that persons with disabilities rely on to access or use OUTFRONT Canada's goods or services, or premises, 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.

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

Notice will be made 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 OUTFRONT Canada website, by contacting persons with disabilities using a method that is reasonable under the circumstances.

2.0 Information and Communication

2.1 Multi-Year Accessibility Plan and Annual Progress Reports

As of June 21, 2021, OUTFRONT Canada will make public a revised Multi-Year Accessibility Plan to improve the accessibility of its good, services and premises and meet the compliance requirements of provincial accessibility legislations.

2.2 Website Accessibility

Where possible, OUTFRONT Canada will publish new web content on its internet website(s) after January 1, 2014, which conforms to Web Content Accessibility Guidelines W3C WCAG 2.0 Level A. OUTFRONT Canada continues to work towards increasing the accessibility of its web content, website(s) and web-based applications.

2.3 Alternate Formats Available Upon Request

All organizational information will be made available to persons with disabilities in an accessible format or via accessible communication support upon request. OUTFRONT Canada will consult with the person making the request to determine the suitability of an accessible format or communication support provided. Timeframes for this information will be dependent upon the format requested, but will be provided as soon as practicable.

OUTFRONT Canada will notify the public about the availability of accessible formats and communication supports through its website(s).

2.4 Accessible Emergency Information

OUTFRONT Canada will provide emergency response information and assistance to persons with disabilities in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

3.0 Employment

3.1 Accommodation of Persons with Disabilities

OUTFRONT Canada will review the needs of applicants, new and existing employees with disabilities who request employment related accommodations. Persons with disabilities requiring employment related accommodation will be consulted when determining suitable accommodation, including the provision of accessible formats or communication supports.

3.2 Individualized Workplace Emergency Response Information

Individualized workplace emergency procedures, plans and safety information are available to employees with disabilities in an accessible format or via accessible communication support upon request. Timeframes for this information will be dependent upon the format requested, but will be provided as soon as practicable.

3.3 Individualized Emergency Response Plans for Employees

All OUTFRONT Canada employees with disabilities that may require assistance in an emergency situation are encouraged to identify their accessibility needs to their immediate supervisor or Human Resources so that individualized emergency accommodation plans can be created. This information will be maintained confidentially, unless assistance is required by the employee, in which case OUTFRONT Canada will provide the workplace emergency response information to the person designated by OUTFRONT Canada to provide assistance to the employee.

4.0 Training

Training will be provided to all employees, volunteers or other third parties that act on behalf of OUTFRONT Canada; and, those who are involved in the development and approval of policies; practices and procedures for the delivery of these services as required by provincial accessibility legislations.

Training Provisions:

Training will include the following information:

- A review of the purpose of provincial accessibility legislations;
- A review of the requirements of the accessibility standards for customer service, information and communication and employment, in accordance with provincial accessibility legislations;
- Instructions on how to interact and communicate with persons with various types of disabilities;
- Instructions on how to interact with persons with disabilities who:
 - use assistive devices;
 - require the assistance of a service animal; or
 - require the use of a support person (including the handling of admission fees)
 - require alternate formats of communication;
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help persons with disabilities;
- A review of different types of alternate formats and accessible communication supports;
- Instructions on what to do if a person with a disability is having difficulty accessing your services;
- A review of OUTFRONT Canada's policies, procedures and practices pertaining to Accessibility.

Training Schedule:

Training will be provided to each person according to his or her duties as soon as is practicable. Training will be provided on an ongoing basis in connection with changes to OUTFRONT Canada policies, procedures and practices governing the provision of services to persons with disabilities. Revised training will be provided in the event of changes to legislation, policies, procedures and/or practices.

Record of Training:

OUTFRONT Canada will keep a record of training that includes the dates training was provided, the number and names of employees who attended the training.

5.0 Feedback Process

OUTFRONT Canada shall provide persons with disabilities with the opportunity to provide feedback on the goods and services they receive. Information about the feedback process will be readily available to all persons with disabilities and notice of the process will be made available at the front desk of our facilities and on our website. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback:

Persons with disabilities can submit feedback to:

- Louise Plant, Vice-President, Human Resources
- (416) 521 6518
- 377 Horner Avenue, Toronto, Ontario M8W 1Z6
- Louise.plant@OUTFRONT.ca
- www.OUTFRONT.ca

Persons with disabilities who wish to provide feedback by completing an onsite feedback form or verbally can do so to any OUTFRONT Canada employee.

Privacy will be respected throughout the feedback process. All feedback will be reviewed for possible improvement in OUTFRONT Canada's goods and services and accessibility to its goods and services. Feedback will be directed to the most appropriate person within OUTFRONT Canada for dealing with it and any complaints will be addressed as soon as possible.

Persons with disabilities that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

6.0 Availability of Documents

OUTFRONT Canada shall notify persons with disabilities that the documents related to Accessibility for Persons with Disabilities are available upon request, in a format that takes into account the person's disability. Notification will be given by posting the information in a conspicuous place owned and operated by OUTFRONT Canada, the OUTFRONT Canada's website and/or any other reasonable method of communication.

7.0 Administration

If you have any questions or concerns about this policy or its related procedures please contact:

- Louise Plant, Vice-President, Human Resources
- (416) 521 6518
- 377 Horner Avenue, Toronto, Ontario M8W 1Z6
- Louise.plant@OUTFRONT.ca
- www.OUTFRONT.ca

This policy came into effect January 1, 2014 and was last revised June 21, 2021. This policy and its related procedures will be reviewed as required in the event of legislative changes.

Referenced Documents:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility for Manitobans Act
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Integrated Accessibility Standards for Information and Communication, Employment and Transportation, Ontario Regulation 191/11
- Dog Owners' Liability Act, Ontario
- The Animal Liability Act, Manitoba
- Ontario Human Rights Code, 1990
- Manitoba Human Rights Code

Acknowledgement & Agreement

I, _____ (Employee Name), acknowledge that I have read and understand the Accessibility Policy of OUTFRONT Canada. Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____