 <p>DATA DIRECT "Empowering our Employees to outperform Customers' expectations through innovation, commitment and effective leadership."</p>	<b>Health &amp; Safety</b>	
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**Data Direct Accessibility Policy has strategies to remove barriers for each of the standards**

**Data Direct can arrange for accessible feedback and alternate formats upon request**

**1.0 PURPOSE**

1.1 Defines Data Direct Group Inc.'s Policy with respect to the training in regards to Accessibility Disability Ontario Act as well as Human Rights.

**2.0 SCOPE**

2.1 This training is applicable only to Data Direct Group Inc.'s employees who interact with the general public as a regular part of their job function. For each training module identify the barriers, train the staff and document the policies and training.

**3.0 WHO REQUIRES TRAINING AND HOW WILL IT BE MANAGED.**

3.1 In accordance with AODA training will be done for anyone who provides goods and services to customers on the Data Direct's behalf. Anyone involved in developing policies including: managers, executive and owners.

3.2 Training is rolled out by the owners and executives to the department managers, then each manager manages the training with their respective staff.


3.3 Training modules applicable to our company may be found here for customer service, information and communication standards, employment, and human rights code. Training is available to watch, read, hear or have it presented to the employee. Training is ongoing throughout the year as well as every 3 years refreshed. We use the government sites available for this such as accessforward.ca. Training records are kept and stored.

3.3.1 General Information - <http://accessforward.ca/>

3.3.2. Customer Service - <http://accessforward.ca/front/customerService/>

3.3.3 Training

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

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In addition, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities. These include: Website and intranet WCVAG 2:0 (Level AA) compliant, language settings for screen readers, make the printed piece with larger size fonts for easier reading. Communicating through the written word instead of verbal word. Record information on mp3.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.


We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

**Multi Year Planning - The Accessibility Policy having strategies to remove barriers for each of the standards.**

3.3.3.1 Step one - Create Policies that outline how we provide goods and services to people with disabilities. Policy is guided by dignity, independence, integration, equal opportunity. Identify, remove and prevent potential barriers for people with disabilities to receive our services. Consider a person's disability when communicating with them. Allow assistive devices. Allow service animals. Welcome support persons. Inform customers when accessible services are temporarily unavailable. Invite customers to provide feedback.

3.3.3.2 Step two – Train Staff

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3.3.3.3 Step three – Document our policies and training. Records are kept for all training taken by our employees.

3.3.4 Information and Communication - <https://accessforward.ca/newado/icsmodule/>

Managing all communication and information in the format that best suits the ability of the person. This includes website and intranet WCAG 2.0 (Level AA) compliant. Offering alternative ways for employees or clients to access information. For clients it may be making the marketing piece carrier larger size fonts for better reading. For employees it may be communicating through the written word instead of verbal word. In some instances, it may mean recorded messages such as messages via mp3.

3.3.5. Employment - <https://accessforward.ca/newado/esmmodule/>

### Interview Process

Ensuring all applicants for employment are aware if they have requirements to help them through the interview process, they can be made available. Such as using a support person with them to help them through the interview process. Having all questions asked in writing rather than verbally. Allowing the person to answer in writing as opposed to verbally.

### Emergency Plan


When an employee needs help in an emergency due to a permanent or temporary disability Data Direct will:

- Provide individualized emergency response information to the employee within 5 working days upon being made aware of them
- Get the employee's consent, then share this information with the people designated to help them in an emergency
- Review the employee's emergency response information when:
  - the employee changes work locations
  - you review the employee's overall accommodation needs
  - you review your organization's general emergency response policies.

For example, during a fire drill held at Data Direct we had an employee who used a cane. A dedicated person was appointed to this employee to ensure this employee exited the fire drill with in a safe manner. Data Direct will create a personalized plan for those who require one.

Things to consider when providing emergency response information:

- Review your emergency information
- Determine who needs help
- Prepare and provide emergency information
- Follow up if the employee moves to a difference work station
- Send out a corporate communication to all employees asking who may need assistance in case of an emergency to ensure there is a plan in place

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- Ask the employees to complete an emergency information worksheet to be able to identify the type of help they may need in the event of an emergency
- From the information gathered create the personal emergency response team and correct action required to help the employee in need

3.3.6 Human Rights Code and AODA working together - <https://www.ohrc.on.ca/en/learning/working-together-code-and-aoda>

3.3.7 The plan will be reviewed by Department Managers, Executives and Founders and signed by the Founders every five years.

3.3.8 Accommodation Plan – Data Direct is committed to accommodating people with disabilities and will use the following process to identify and meet employee accommodations needs as laid out in the individual accommodation plan process template.

- Upon being made aware and recognizing the need for accommodation for an employee Data Direct will utilize the individual accommodation plan template and complete and keep confidential the responses and plan as it pertains to the individual
  - o Gather Relevant information according to the individual accommodation plan process template available.
  - o Data Direct will write an individual accommodation plan that is appropriate for the individual according to the individual accommodation template.
  - o Data Direct will implement, monitor and update the plan according to the individual accommodation plan process
  - o It will take in all requirements under section 28 of Regulation 191/11


3.3.9 Return to Work – Data Direct is committed to supporting employees who have been absent from work due to a disability. We will use the following process to help employees who require accommodation to return to work as it is laid out in the return to work process template.

- Initiate the leave and stay in contact with the employee.
- Gather relevant information and assess individual needs as per the return to work process template.
- Develop a return to work plan as per the return to work process template
- Implement, monitor and update the plan according to the return to work process template.
- It will take in all requirements under section 29 of Regulation 191/11

#### **4.0 MAINTAINING RECORDS OF TRAINING**

4.1 As a business with more than 50 employees we will maintain written training records that include when the training was delivered, who attended and how many people took the training. The VP of Information Technology will assign a designate who will keep these records up to date and available on the company's internal storage system.

#### **5.0 TRAINING TIPS TO REVIEW INCLUDING:**

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- 5.1 People with physical / mobility disabilities
- 5.2 People with vision loss
- 5.3 People with hearing Loss
- 5.4 People who are deafblind
- 5.5 People who have learning disabilities
- 5.6 People who have developmental disabilities
- 5.7 People who have mental health disabilities
- 5.8 People who use assistive devices
- 5.9 People who use service animals
- 5.10 People with a support person
- 5.11 When it may be necessary to require a support person
- 5.12 Ask "How can we help you" when people access goods, services or our facility, and offer an opportunity to give feedback.