

Accessibility Policy and Multi-Year Accessibility Plan

Effective November 1, 2022

Summary

This accessibility policy and multi-year accessibility plan outlines the current, ongoing and planned actions of Lighthouse Labs Inc. (“LHL”) as it strives to ensure equality of opportunity for people with disabilities. This plan will primarily reference adherence and compliance to the Accessibility for Ontarians with Disabilities Act (“AODA”) and the Ontario Human Rights Code, but Lighthouse Labs Inc. applies this policy across Canada and not just Ontario, as we are a national company.

This policy and plan will be reviewed once every five years. A review will be conducted more frequently in the event of legislative changes or any changes to the work or the workplace that necessitates an earlier review.

Individuals can request a copy of this policy and plan at any time in a format or with communication supports that meet the needs of the individual.

Unless otherwise stated in this policy and plan or in accordance with applicable law, the commitments set out in the plan are being achieved and/or implemented and/or planned as of the effective date of this policy.

Statement of Commitment

LHL is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. LHL is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under all accessibility legislation, regulations, and laws.

In order to meet this commitment, LHL is currently complying with those provisions of the AODA that are in effect. Equally importantly, LHL has created a multi-year accessibility plan for the purpose of continuing to meet its commitments under the AODA.

Please also see LHL’s Accessible Customer Service Policy for information about how LHL meets the requirements of the Customer Service Standard under the AODA.

LHL is currently working towards becoming WCAG 2.0, Level AA compliant for

educational content, platforms, education delivery, and website by the end of the 2023 calendar year. To complete these, we currently have multiple plans in place within our Learning Development, Education Delivery, Software and Technology, and Marketing teams.

Educational or training resources or materials and student records will be made accessible upon request.

Accessible Emergency Information

LHL is committed to providing its customers with publicly available emergency information in an accessible format and/or with appropriate communication support, upon request.

LHL also provides individualized emergency response information to employees who, for reasons related to their disability, require such information.

LHL will ensure all employees, volunteers, persons participating in the development and approval of LHL's policies, and others who provide goods, services or facilities on behalf of LHL are trained on:

- a. the Integrated Accessibility Standards of the AODA; and
- b. the Human Rights Code as it relates to people with disabilities.

Training will be appropriate to the duties performed by the individual. Training will be provided as soon as practicable after an individual begins working, volunteering or otherwise providing services necessitating training.

LHL will keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

LHL will ensure that training is provided on any changes to relevant policies on an ongoing basis.

LHL has developed Emergency Response documents ([Emergency Response Questionnaire](#), [Emergency Response Plan Template](#), and [Notice to Employees for Emergency Accommodations](#)) for those who need accommodations during emergency situations. These documents will be available to employees upon request and prior to LHL hosting any in-person event, conference/meeting, and/or in the event we move away from a remote work environment to a physical work environment.

Information and Communications

LHL is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and

communication needs.

Websites

LHL is committed to meeting the communication needs of people with disabilities. Upon request, LHL will consult with people with disabilities to determine their information and communication needs.

LHL will also ensure that existing websites and web content conforms with the requirement of WCAG 2.0, Level AA. Currently, LHL has a plan to implement a new website design that conforms the WCAG 2.0, Level AA as of December 31, 2023. LHL is currently in the Request For Proposals (RFP) stage to select a website development provider to ensure these changes are implemented by end of the 2023 Calendar year.

Feedback Processes

LHL welcomes and appreciates all forms of feedback. LHL will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request:

1. LHL will review its existing processes for receiving feedback, to ensure that disabled individuals can provide feedback in a manner that meets their particular needs.
2. Upon request and in a timely manner, LHL will provide an accessible format and/or communication support to enable an individual with a disability to provide feedback. Feedback can be delivered verbally (in person or by telephone) or in writing (and delivered in person or via regular mail, fax or email). If a method of providing feedback is not suitable, LHL will prove additional alternate methods upon request.
3. Feedback received by LHL will be redirected to a designated contact person. Customers can expect to hear back within 10 business days.
4. Along with providing acknowledgement of such feedback, LHL will communicate any resulting actions based on concerns or complaints that were submitted.
5. Upon request and in a timely manner, LHL will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication supports.

Publicly Available Information

LHL will take the following steps to make sure all publicly available information is made accessible to persons with disabilities upon request:

1. LHL will review its existing processes for providing the public with information, to ensure that disabled individuals can also receive such information in a manner that meets their particular needs.
2. Upon request and in a timely manner, LHL will provide an accessible format and/or communication support to enable an individual with a disability to receive

publicly available information.

3. Requested information will be provided in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
4. LHL will consult with the person making the request to determine the suitability of the accessible format or communication support that is requested.

Employment

LHL is committed to fair and accessible employment practices. This commitment applies at all stages of the employment relationship. LHL has implemented various Accessibility policies and processes in compliance with Accessibility regulations, legislations, and laws to support employees and remove barriers for those with disabilities.

Hiring Practices

We commit to undertake reviews of existing policies, to create new policies if required, and to revise document templates as required to promote accessibility and reduce barriers to employment. Specifically, and further to its objective of creating an inclusive workplace, LHL will take the following steps in respect of its recruitment processes:

1. LHL will ensure that job postings will specify that accommodation is available for applicants with disabilities during the recruitment and interview/assessment processes.
2. LHL will train its staff involved in recruitment and hiring to advise applicants verbally, at the time that they are offered interviews or other assessment processes, that accommodation is available for applicants with disabilities during the interview/assessment processes.
3. If an applicant requests accommodation, LHL will consult with the applicant to determine the appropriate means of accommodation.
4. LHL will include, in offer letters made to successful job candidates and/or other documentation provided upon hire, notice of its policies concerning accommodation of employees with disabilities as well as information on where and how to obtain copies of such policies, including in accessible formats.

Accommodation Information

Upon request, LHL will ensure that any employee with a disability will receive information in a format that is accessible or that provides communication support to the employee. Information for the purpose of this policy includes (a) information that is required for an employee to do the job for which they were hired and (b) any other information that is generally available to employees in the workplace.

Individual Accommodation Plans

LHL will maintain a process for developing individual accommodation plans and return-to-work plans for employees that have been absent from the workplace due to a disability. In furtherance of this objective, LHL will undertake the following:

- LHL will ensure that an employee requesting accommodation can participate in the development of the individualized accommodation plan. Employees will be able to participate in the development of the individualized accommodation plan by (a) advising LHL of the limitations brought about by the nature of their disability; (b) suggesting methods of accommodating those limitations; and (c) providing medical support for any accommodations requested.
- Employees will be able to participate in the development of the individual accommodation plan by meeting with LHL's management and/or Human Resources representative at a mutually convenient time or by providing their written comments to LHL. Please note that LHL may require an employee to provide medical support for accommodations requested and/or a meeting in order to canvass possible options for accommodation.
- LHL will support the ongoing assessment of employees for the purpose of individualized accommodations with reference to any medical information provided by the employee and any medical information requested based upon objective observations and criteria that may necessitate an initial or ongoing physical or mental assessment.
- LHL may request an independent medical examination to assist in the accommodation process. Any request for an independent medical examination will be made in writing and the cost of the examination will be borne by LHL or its insurer, as the case may be.
- An employee's privacy, as it relates to any personal information disclosed as a result of the need for an individualized accommodation plan, will be safeguarded. LHL will keep any information disclosed and will not share that information (except as required to implement the individual accommodation plan, including with medical consultants retained by LHL) with any third party without the consent of the employee.
- Individualized accommodation plans will be reviewed once every year or upon the provision of new, objective medical information that necessitates an earlier review. LHL will undertake the review and will consult with the employee if it is determined that amendments to the plan are required. An employee can request a review of the individualized accommodation plan at any time, understanding that such requests must be objectively necessary and based upon a change in the employee's accommodation needs, the workplace duties being assigned and/or the physical layout of the workplace.
- In the event that a request for individualized accommodation plan is denied (in whole or in part, including requests to amend the plan), LHL will notify the employee of the reasons for the denial in writing and, with reference to the employee's disability, in an alternate format that takes into account the employee's disability.
- Individualized accommodation plans will be provided to an employee in writing

and, with reference to the employee's disability, in an alternate format that takes into account the employee's disability.

Accessibility Needs Considered

LHL will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if LHL uses performance management, career development and redeployment processes:

1. LHL will take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account in assessments of performance.
2. LHL will take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities.
3. LHL will take into account the accessibility needs of employees with disabilities when redeploying employees, as that term is understood in the AODA.

Return to Work

LHL is committed to safely returning employees who have been absent from the workplace to work, with or without accommodation, at the earliest opportunity. To do so, LHL has developed the following return-to-work process:

1. An employee who makes a request to return to the workplace after a period of disability will be returned to work (with or without accommodations) at the earliest opportunity;
2. LHL reserves the right to require an employee to provide objective medical information confirming their ability to safely return to work;
3. LHL will implement its individualized accommodation plan policy for any employee who requires accommodations upon their return to work; and
4. LHL will allow the employee to provide input into their return to work plan, subject at all times to the right of LHL to request objective medical information in support of a particular request.

Design Standards

Lighthouse Labs Inc. is a fully remote company, therefore does not occupy any physical space. However, if LHL in the future is building or making any major modifications to a public space it will comply with all legislative requirements, including those mandated by the AODA.

For more information

For more information on this accessibility plan, or to obtain this document in accessible formats, please contact our Human Resources Department.

