



Policy Employment Equity Accommodations

SUBJECT: Employment Equity Accommodations Policy
DISTRIBUTION: All Group Employees in Canada
APPROVED BY: Human Resources and Corporate Governance Committee
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1. CONTEXT

The Group fully subscribes to the principle of employment equity and is committed to protecting employees' human rights and supporting their accessibility needs in accordance with the *Employment Equity Act*, *Accessibility for Ontarians with Disabilities Act, 2005*, *Canadian Human Rights Act*, and other applicable federal and provincial accessibility and human rights legislation where the Group operates.

Accommodations represent an essential element in any employment equity system. In fact, to achieve employment equity, certain particular situations, human rights or special needs should be taken into consideration and, if need be, accommodations should be put in place for employees and job applicants. A policy regarding accommodations is therefore essential in attaining this objective.

Along with its Employment Equity Accommodations Steering Committee, its managers, its human resources advisors and its employees, the Group intends to implement a process to conceive, develop and carry out appropriate and useful accommodations.

2. SCOPE

This policy is intended for all Group employees and job applicants in Canada.

3. DEFINITIONS

Employment Equity Accommodations Steering Committee includes four members: the Executive Vice President & Chief Human Resources Officer; Assistant Vice President, Employee Relations; Senior Manager, Labour Relations; and the applicable Assistant Vice President, Human Resources supporting the business line involved.

Designated groups mean women, Indigenous peoples, persons with disabilities and members of visible minorities.

Indigenous peoples mean persons who are Indians, Inuit or Métis.



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Persons with disabilities mean persons who have a long-term or recurring physical, mental or sensory, psychiatric or learning impairment, or:

- Consider themselves to be disadvantaged in employment by reason of that impairment, or
- Believe that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment or whose functional limitations owing to their impairment have been accommodated in their current job or workplace.

Members of visible minorities means persons, other than Indigenous peoples, who are non-Caucasian or non-white in colour.

Human right means the right to be free from discrimination in employment based on race, age, disability, national or ethnic origin, colour, religion, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been granted. These prohibited grounds of discrimination are those protected by the *Canadian Human Rights Act*, but all other grounds prohibited by applicable provincial human rights legislation are also included in this list and apply in the applicable provincial jurisdictions where the Group operates, such as, but not limited to, place of origin, pregnancy, civil status, political convictions, language, social condition, ancestry, citizenship, creed and record of offences.

4. SITUATIONS REQUIRING ACCOMMODATIONS

The purpose of accommodations is to prevent and remove barriers to ensure the equity, inclusion and full participation of employees in the workplace and job applicants in the recruitment process. Accommodations cannot fit into predetermined categories, they must be developed to meet and adjust to particular situations, human rights or special and evolving needs. Accommodations can apply to all Group operations. Without limiting the generality of the above, accommodations could, among other activities, apply to work conditions, work tools, methods, communications or installations.

Human resources advisors and managers should be proactive and deploy joint efforts in monitoring the Group's operations in order to identify all particular situations, human rights or special needs which could require the implementation of an accommodation. Should the human resources advisor and the manager concerned identify such a situation, human right or need for an accommodation and wish to seek guidance from the Steering Committee, they may notify the Steering Committee in writing.

Employees and job applicants may also formulate a request for an accommodation regarding a human right or specific need by submitting such a request in writing to their manager or hiring manager, who will meet with the employee or job applicant and if necessary, the sector's human resources advisor to analyze the situation. The employee, the manager, the sector's human resources advisor, and the Senior Advisor, Disability Management if related to a return to work following a disability related leave of absence, will attempt to resolve the request for accommodation while respecting confidentiality. The accommodation process is a shared responsibility, and everyone involved must work cooperatively, share information, and work towards potential accommodation solutions.

An employee or job applicant who does not agree with the decision made following the meeting between the concerned manager or hiring manager, the sector's human resources advisor and if applicable, the Senior Advisor, Disability Management, may submit a written request to the Executive Vice President & Chief Human Resources Officer for consideration by the Employment Equity Accommodations Steering Committee. Contact information is available to employees on the Group's intranet.



5. SELECTING AN ACCOMMODATION

The Employment Equity Accommodations Steering Committee is responsible for examining any particular situation, human right or special need submitted in support of a request for an accommodation. The Employment Equity Accommodations Steering Committee decides whether or not a particular situation exists and, if need be, selects the most suitable accommodation. The Employment Equity Accommodations Steering Committee then submits its recommendation to the Group's Senior Management.

The Employment Equity Accommodations Steering Committee may seek the services of an external expert or advisor in fulfilling its duty.

It is understood that accommodations should not force the Group to apply measures susceptible or causing it unwarranted prejudice or excessive constraint, hiring or promoting unqualified individuals or creating new jobs. In short, the Group will accommodate employees and job applicants up to the point of undue hardship.

A recommendation from the Employment Equity Accommodations Steering Committee must be subjected to the Group's decision, which may either confirm, modify or reject the recommendation according to the circumstances.

6. INTERPRETATION OF THIS POLICY

If you have questions about the interpretation or application of this Policy, please contact your manager or hiring manager, Human Resources advisor, or the Human Resources Expertise Centre (HREC). Contact information is available to employees on the Group's intranet. The HREC is also available to assist employees identify the name and contact information of the Human Resources Advisor assigned to their sector.

7. FREQUENCY OF REVIEW

This policy will be reviewed annually by Human Resources.

Document history				
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