

## 1. Policy Statement

Epic Information Solutions Inc. ("Epic" or the "Company") is committed to meeting its accessibility and non-discrimination obligations under the *Accessibility for Manitobans Act* and regulations made thereunder ("AMA") and applicable human rights legislation (together as the "Legislation").

Our policies, practices and measures reflect principles of dignity, independence, integration and equal opportunity for people with disabilities.

The Company will take the necessary steps to allow employees to contribute their skills and experience to the organization's performance without discrimination by:

- fostering an inclusive workplace;
- working to ensure that all corporate activities (policies, practices and procedures) contribute to an inclusive and non-discriminatory work environment;
- providing an accommodation policy and procedure to ensure we have an appropriate approach to individual accommodation requests, which is both consistent and flexible; and
- communicating employee rights to seek accommodation and enabling easy access to the request procedure.

The following policy statements, organizational practices and measures are intended to meet the requirements of the Legislation. This policy applies to management, human resource practitioners and employees of the Company.

## 2. Pre-employment Accessibility Requirements

### 2.1 Remove barriers to recruitment and selection.

#### **Policy Statement**

During recruitment, we inform potential applicants that reasonable accommodations are available during the selection process, and we respond to requests for accommodations.

#### **Practices and Measures:**

- We include a statement on all job postings that reasonable accommodations are available to applicants with disabilities, and we seek their advice on how best to accommodate their needs.
- When making interview arrangements in writing or verbally, we inform applicants that reasonable accommodations are available during the assessment and selection processes.
- When an applicant has made a request for an accommodation during the selection process, we:
  - Consult with the applicant to determine the reasonable accommodation
  - Put the reasonable accommodation in place during the assessment or selection process.

### 2.2 Mention workplace accommodations when offering employment

#### **Policy Statement**

When making an offer of employment, we inform selected applicants of our measures, policies and practices for accommodating employees with disabilities.

#### **Practices and Measures**

- We include information about workplace accommodations in our offer letters to new employees.
- We include information about workplace accommodations in our new employee orientation materials.

## 3. Employment Accessibility Requirements

### 3.1 Inform employees about accommodation policies and practices

#### Policy Statement

We keep employees informed about our accommodation measures, policies and practices for employees with disabilities. We also provide updates to employees when this information changes.

#### Practices and Measures

- We provide information to employees about our policies for employees with disabilities and any updates in multiple ways, such as:
  - posted on an internal site
  - posted on a public website
  - posted in the staff room or in high traffic areas
  - through discussions with management (in person, by phone or through email)
  - during staff meetings

### 3.2 Communicate in a way that meets employees' needs

#### Policy Statements

We aim to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone. If requested by an employee with a temporary or permanent disability, we:

- Consult with the employee to identify the alternative formats, or communication supports needed when providing information to the employee.
- Ensure that identified alternative formats or communication supports are continually used when providing information to the employee.

#### Practices and Measures

- To meet an employee's communication needs, we ask the employee what alternative format or communication support is most appropriate for them.
- We provide information to employees in multiple ways to meet everyone's needs, including brail, large print and e-text, such as circulating information electronically by email in alternative formats.

### 3.3 Provide individualized accommodation plans.

#### Policy Statement

As set out in our Individualized Accommodation Policy, we provide reasonable accommodations by developing and documenting individualized accommodation plans for employees with disabilities who request them.

#### Practices and Measures:

The individualized accommodation plan includes:

- alternative formats and communication supports, if requested
- workplace emergency response information, if required
- details of how and when any other accommodations will be provided
- when the plan will be reviewed

Our employees will participate and cooperate in the accommodation process by:

- providing related information and taking part in assessments, if requested by the employer
- complying with the individualized accommodation plan
- offering ongoing feedback related to modifications, including whether the accommodation is no longer required

Supervisors will review the accommodation plan on the three-month anniversary date and in combination with regular annual employee reviews.

Supervisors will also review an employee's individualized accommodation plan, and update if required, when:

- the employee's workspace is modified or relocated
- the employee's responsibilities have changed
- other workplace changes have occurred that affect the accommodation
- the employee has made a request to review and update the accommodation

### **Request for an individualized accommodation plan**

We support employees by providing reasonable accommodations in the workplace. Employees may make a verbal or written request to the manager, supervisor or other human resources representative for an individualized accommodation plan.

### **Assessment of employee and accommodation required**

We will assess the employee and possible accommodations on an individual basis. We may request that the employee provide documentation from a health practitioner who supports the need for the accommodation. We may request an evaluation by an independent regulated health professional or other practitioner in the area of workplace accommodations for employees with disabilities.

### **Assistance for the employee in developing the accommodation plan**

An employee may request assistance with developing the plan, including:

- Assistance from another person who is knowledgeable about workplace accommodations for employees with disabilities.

### **Alternative formats**

We meet the communication needs of our employees by providing them with a copy of their plan, or an explanation for denying the request to introduce a plan, in a format and with any communication support to meet the needs of the employee.

### **Reasons for denying a request**

We may deny an employee's request for an individualized accommodation plan in the following circumstances:

- The employee is able to carry out most of the job without an accommodation.
- The independent regulated health professional(s) or other requested medical documentation does not support the employee's self-assessed requirement for a workplace accommodation.
- Our research and evidence shows that the accommodation request would cause undue hardship (e.g., by creating safety risks to other employees or a significant measurable financial burden).

### **Maintaining Privacy**

We maintain employee privacy regarding accommodation plans and personal health information by following the practices outlined in 3.8 below.

## **3.4 Manage performance**

### **Policy Statements**

We ensure our performance management process takes into account:

- that an employee may be temporarily or permanently disabled
- an employee's individualized accommodation plan
- that the accommodations provided for an employee may not fully address a workplace barrier

## Practices and Measures

- We meet with new staff six months into employment and at least once annually to discuss progress, new goals and any challenges. Existing or newly required workplace accommodations are discussed, including individualized accommodation plans and any assistance required during emergencies.
- We speak with employees when they do not follow company policy or meet expectations, including disciplinary action.
- We discuss existing workplace accommodations and propose modifications or new workplace accommodations if we believe this could help improve the performance of an employee with a disability.
- Prior to imposing disciplinary measures, we consider whether there is a connection between concerns about job performance and workplace barriers.

### **3.5 Provide career development, training, internal advancement and reassignment.**

#### Policy Statements

When providing career development, training or opportunities for internal advancement or reassignment, we ensure the process for recruiting and selecting candidates takes into account:

- that an employee may be temporarily or permanently disabled
- an employee's individualized accommodation plan
- that the workplace accommodation provided for an employee with a disability may not fully address the workplace barrier

Our practices and measures aim to ensure that workplace accommodations do not negatively affect access to career development.

#### Practices and Measures

- We recruit and select candidates based on objective criteria, such as current training, job experience, skills and number of years on the job.
- If a candidate has an individualized accommodation plan, we ensure it is adequate to address any barriers presented by the new opportunity, or we modify the plan accordingly.
- Our training program and methods for career development are accessible to all employees. If a barrier is identified, we attempt to remove or reduce it.

### **3.6 Put return to work processes in place**

#### Policy Statements

As documented in our Return to Work Policy, we are committed to providing a safe and healthy working environment for employees who are, or have been, absent from work due to a disability or health condition, and require reasonable accommodations to return to work.

We include a description of the process we will follow in determining the accommodations necessary to facilitate the return to work of employees who have been absent due to a disability or health condition.

Our Return to Work Policy ensures reasonable accommodations for employees who are at work or absent due to a disability or health condition. We will make efforts to modify employees' duties and work schedule based on their functional abilities. Our aim is to increase duties safely to help employees reach their full potential.

#### Practices and Measures

- We keep in touch with absent employees and the Workers Compensation Board of Manitoba (WCB) throughout the employees' recovery to help them maintain a connection with their workplace and to show they are valued.
- We offer meaningful and productive modified or alternate duties that are safe and within the employee's functional abilities.
- We are flexible and tailor the return to work plan to the employee's needs.
- We ensure supervisors and co-workers support employees who have been absent due to a disability, and participate in the return to work process.
- We educate staff on why returning to work is good for business and outline the expectations for supporting an employee in a modified role.

## **3.7 Provide workplace emergency response information**

### **Policy Statements**

We notify all employees of steps to be taken during emergencies, to ensure the safety of employees who are temporarily or permanently disabled. We ensure workplace emergency response information is specific to each employee's needs and the physical nature of the employee's workspace. Once we learn an employee requires assistance during a workplace emergency, we offer the employee individual workplace emergency response information as soon as possible.

- We review the workplace emergency response information provided to an employee each time:
- the employee is moved to a different workspace
- the employee's workspace is modified

We review our general emergency response plans and make changes that would affect the employee's response to an emergency in the workplace. If an employee who receives workplace emergency response information requires the assistance of another person during an emergency, we obtain consent from the employee on who will assist, and we inform that person how to assist.

## **3.8 Maintain privacy**

### **Policy Statements**

We protect the privacy and confidentiality of employee's personal information and personal health information. We only collect, use, and disclose information as required for the purposes of the Accessibility Standard for Employment, unless otherwise agreed to by the employee. We also follow the requirements of other privacy legislation as applicable.

### **Practices and Measures:**

- We follow proper protocol when storing confidential employee information.
- We protect our employees' personal information and personal health information at all times by taking the following steps, such as using confidential forms or locking file storage and limiting access to human resources and managers only.

## **3.9 Provide training**

### **Policy Statements**

We provide training on how to accommodate employees with a disability to staff with the following responsibilities:

- recruiting, selecting or training employees
- supervising, managing or coordinating the work of employees
- promoting, redeploying or terminating employees
- developing and implementing employment policies and practices

Training content includes:

- how to make employment opportunities accessible to people with disabilities
- how to interact and communicate with applicants or employees who face barriers, use assistive devices, or are assisted by a support person or service animal.
- an overview of the *Accessibility for Manitobans Act*, applicable human rights legislation and the Accessible Employment Standards
- our organization's accessible employment policies, practices and measures, including updates or changes Practices and Measures:
- We train new employees and management as soon as reasonably possible.
- We provide refresher training regularly, including informing staff about updates to policies, practices and measures.

### Alternative Formats

This document is available in alternative formats upon request at no extra cost. To request an alternative format, please contact:

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