

Multi-Year Accessibility Plan (“MYAP”)

Accessibility Plan and Policies for Allstream Inc. and its subsidiaries/divisions including Unified Communications/Delphi Solutions Corp. (collectively referred to as “Allstream”)

This 2015-2021 MYAP outlines the policies and actions that Allstream will put in place to improve opportunities for people with disabilities. This MYAP shall:

- be posted on the Allstream website and be provided in an accessible format upon request; and
- be reviewed and updated at least once every five (5) years.

Statement of Commitment

Allstream 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. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by endeavouring to prevent and remove barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”), including the Regulations thereunder (namely, the *Integrated Accessibility Standards* and *Accessible Customer Service Standards*).

Accessible Emergency Information

When necessary, Allstream is:

- a) committed to providing its customers and clients with publicly available emergency information in an accessible way upon request; and
- b) will also provide employees with disabilities with individualized emergency response information.

Training

In respect of this MYAP and human rights laws as it relates to people with disabilities, Allstream will train:

- a) all its employees and volunteers;
- b) all persons who participate in developing Allstream policies; and
- c) all other persons who provide goods, services, or facilities on behalf of Allstream,

and training may be limited to review of this MYAP. (Allstream has a separate policy/plan and training related to the *Accessible Customer Service Standards*.)

The timing of training on the MYAP for the above individuals is as follows:

- a. as soon as reasonably practicable; and
- b. ongoing in respect of any changes to the MYAP.

Allstream is taking the necessary steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws, including the following:

- making training materials available on the Allstream intranet;
- tracking who has completed training.

Information and communications

Allstream is committed to endeavouring to meet the communication needs of people with disabilities. If necessary, we will seek feedback from people with disabilities to determine their information and communication needs.

Taking into consideration, among other things,

- a) the availability of commercial software or tools or both; and
- b) the significant impact on an implementation timeline that was planned or initiated before January 1, 2012,

Allstream will, where required, take reasonable steps to make all new internet websites/web content or an existing website undergoing a significant refresh (when published after January 1, 2012) conform with Web Content Accessibility Guidelines (**WCAG**) **2.0, Level A** by **January 1, 2014**. This may include obtaining advice or feedback (including estimated costs/budgetary impacts) from Allstream's web developer or technical experts in the event of any significant refresh, new internet websites and/or web content.

To ensure existing feedback processes are accessible to people with disabilities upon request, on its website, Allstream:

- will post the feedback process;
- advise that feedback may be provided to Allstream by email, fax, or phone; and
- upon request, will provide documents required under AODA in a format that takes into account a person's disability.

Allstream will take the following steps to make sure all publicly available information about Allstream's goods, services and facilities is made accessible upon request by **January 1, 2016**:

- assess Allstream's information;

- provide or arrange for the provision of accessible formats and communication supports upon request, in a timely manner, taking into account the person's accessibility needs;
- work with the requester to figure out how to meet their needs;
- let the public/customers know that Allstream will make information accessible upon request, e.g., by way of a note on our website or promotional materials.

To make all websites and content conform with **WCAG 2.0, Level AA** by **January 1, 2021**, Allstream will work with its web developer/technical experts to assess and plan so that all public websites and all web content on those sites published after January 1, 2012 conform with **WCAG 2.0 Level AA**, other than providing captions on live videos or audio descriptions for pre-recorded videos.

Employment

Allstream is committed to fair and accessible employment practices.

By **January 1, 2016**, we will take the steps below to notify the public and staff that, when requested, Allstream will accommodate people with disabilities during recruitment, hiring, and assessment. Unless otherwise specified in the list below, we shall meet such employment requirements by **January 1, 2016**.

- **Making Hiring Accessible:**
 - let job applicants know that we will accommodate disabilities during the selection process (e.g., post the information on our website or include it in job postings, call applicants directly or speak to them in person, and/or write them a letter or send an email);
 - if accommodation is requested, consult with them and make adjustments that best suit their needs;
 - notify successful applicants of our policies for accommodating employees with disabilities (e.g., include the information in the offer letter or in a separate email, call applicants directly or speak to them in person).
- **Supporting Employees with Disabilities:**
 - notify staff about policies for supporting employees with disabilities, and we have the flexibility to do this in a way that best suits Allstream's culture and business practices, such as by using:
 - newsletters;
 - emails;
 - memos;
 - our internal website;
 - bulletin boards;
 - staff meetings; and
 - one-on-one conversations;
 - tell employees about these policies when:
 - we hire new employees; and

- we change the policies;
- make workplace information accessible to employees by:
 - providing requested information in an accessible format or with communication supports suited to the employee's individual needs;
 - talking to employees with disabilities to learn what will help them to access workplace information;
- help employees with disabilities stay safe:
 - as of **January 1, 2012**, if we know an employee with a disability might need help in an emergency, we:
 - give them individualized emergency response information;
 - obtain their consent, then share this information with anyone designated to help them in an emergency;
 - review the emergency response information when:
 - the employee changes work locations;
 - we review the employee's overall accommodation needs;
 - we review Allstream's emergency response policies;
- develop individual accommodation plans for employees with disabilities in a clear and consistent way, that is:
 - we outline what we will consider when we need to develop such a plan, such as how we will:
 - involve employees in the development of their plans;
 - assess the accommodation needs of employees;
 - protect the privacy of employees' personal information;
 - if applicable, tell employees why we would deny a request for an accommodation plan;
 - provide plans in accessible formats, as needed; and
 - review and update plans with employees;
 - in most cases, employees with disabilities will tell us if they require accommodation; however, we may be proactive in that if we see that an employee has a disability that may require accommodation, we may initiate a conversation to find out how we can accommodate their needs;
 - when we create such plans, we outline:
 - the accommodations we will provide;
 - how we will help our employees stay safe in an emergency;
 - accessible formats and communications supports our employees need; and
 - how and when we will review and update the plans; and
 - we keep this information private;
- help employees with disabilities return to work, that is, we will:
 - outline the steps we will take to help our employees return to work when they:
 - have been absent because of a disability; and
 - need some form of disability-related accommodation to return to work;

- take into consideration temporary, recurring and permanent disabilities;
- determine whether employees will need some form of employment-related accommodation to return to work effectively and, if so, create an accommodation plan;
- make performance management, career development and job changes accessible to employees by:
 - taking into account the accessibility needs of our employees and any accommodation plans, for example:
 - re: performance management:
 - reviewing employees' accommodation plans to understand their needs and determine if adjustments are needed for their success;
 - making performance management documents available in accessible formats, when requested;
 - providing feedback and coaching of employees in an accessible way;
 - re: career development: considering what accommodations are needed to learn new skills or take on more responsibilities in their current position; and
 - re: job changes: thinking about what could be done to help employees with disabilities succeed in other positions at Allstream when they change jobs.

Design of Public Spaces

At present, Allstream is not required to meet the *Integrated Accessibility Standards* for the Design of Public Spaces because Allstream has no foreseeable plans for new construction of or redevelopment or major modifications to public spaces on or after January 1, 2017. Examples of such public spaces are:

- Outdoor public eating areas like picnic areas;
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals;
- Accessible off-street parking; and
- Service-related elements like service counters, fixed queuing lines and waiting areas.

Allstream is not required to meet the *Integrated Accessibility Standards* for the Design of Public Spaces when Allstream does any of the following:

- unplanned changes to public spaces (e.g., emergency repairs);
- maintenance (e.g., minor repairs); and
- environmental mitigation/restoration.

For more information

For more information on this MYAP, please contact Allstream:

- Phone: (416) 640-5250
- Email: CustomerAccessibility@allstream.com

Accessible formats of this document are available free upon request from:
CustomerAccessibility@allstream.com.