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## Integrated Accessibility Standards (IAS) Policy

### Our Statement of Commitment

TrueBlue, Inc. and its subsidiaries (“TrueBlue” or “Company”) is dedicated to treating all individuals in a way that allows them to maintain their dignity and independence. We believe in equal opportunity, access and participation for people with disabilities. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by ensuring compliance with Ontario’s accessibility laws.

This Integrated Accessibility Standards policy (“IAS Policy”) is intended to highlight TrueBlue’s continued commitment to and compliance with the Accessibility for Ontarians with Disabilities Act (AODA).

### Purpose and Scope

The Integrated Accessibility Standards Regulation establishes the accessibility standards and compliance requirements for each of the following five standards; Customer Service, Information and Communication; Employment and where applicable, Transportation and Design of Public Spaces. This IAS Policy will outline how TrueBlue achieves the standards that are applicable to our business. This IAS Policy is in addition to and does not replace our Accessible Customer Service policy that sets out how we provide services to clients with disabilities and satisfies the requirements of the Customer Service Standard.

This IAS Policy applies to paid employees and volunteers (as applicable), including, but not limited to full-time, part-time, seasonal and contract employment.

### Definitions

#### *Disability*

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or

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- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

### *Barrier*

Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, a technological barrier, a policy or practice.

### *Accessible Formats*

The presentation of printed, written, or visual material so that people who do not read print can access it. This includes braille, large print, recorded audio, screen readers and accessible web content.

### *Communication Supports*

Methods by which people who cannot access verbal or audio information to receive it visually or ways for people who are non-verbal to communicate with people who speak. Supports that facilitate effective communication include captioning, alternative and augmentative communication and sign language.

## **Training**

TrueBlue will provide training to all employees, volunteers, and persons who participate in the development of AODA policies on: (1) the requirements of the IAS Policy, (2) the *Human Rights Code* as it pertains to persons with disabilities; and (3) the AODA Policies as required by the IAS. The content of this training will be applicable to the individual's duties. Training will be provided to new hires, when employees have a change in job responsibilities (as may be applicable to the change in job responsibilities), and when there are material changes to AODA policies. Documentation of training will be retained. TrueBlue will ensure that contractors providing goods, services and/or facilities on the Company's behalf have satisfied relevant training requirements.

## **Standards**

Information and Communication. TrueBlue is dedicated to meeting the communication needs of people with disabilities and will achieve this through the following methods:

- Accessible formats and communication support.
  - TrueBlue will provide accessible formats and communication supports for persons with disabilities when requested. Any request for accessible formats and communications supports will consider the persons accessibility needs to determine the appropriate format or support and will be provided in a timely manner.

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- Emergency procedures, plans or safety information
    - TrueBlue will make available to the public, when requested, emergency and safety procedures and plans in an accessible format and with appropriate communication supports.
  - Accessible websites and web content
    - TrueBlue will ensure that its internet websites, including web content, conform to the Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable, the Company will provide an explanation upon request.
  - Feedback.
    - TrueBlue will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities and will communicate the availability of accessible feedback procedures when requested.

The Information and Communication Standards do not apply to: (1) products and product labels, (2) uncontrovertible information or communications; and (3) information that TrueBlue does not control directly or indirectly through a contractual relationship. Should TrueBlue determine that information or a communication is uncontrovertible, it will explain why and provide the person making the request with a summary of the said information or communication.

Employment. TrueBlue is committed to applying fair, respectful and accessible employment practices throughout the employment lifecycle. This includes the recruitment, hiring, performance management, return to work processes and redeployment.

- **General Recruitment, Assessment and Selection Process**

- TrueBlue will
  - notify the public and employees of the availability of accommodation for job applicants during the recruitment process.
  - further notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request if the applicant requires accommodation due to a disability
  - consult with an applicant who requests an accommodation and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs.
  - notify successful applicants of its policies on accommodating employees with disabilities
  - inform existing employees of its policies on supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability
  - provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities

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- **Accessible Formats and Communication Supports**
    - TrueBlue will
      - upon request of any employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee.
      - consult with the employee making the request to determine the suitability of any Accessible Formats and Communication Support that will be provided in the circumstances.
  
  - **Performance Management, Career Development and Redeployment**
    - TrueBlue will
      - take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when
        - applying its performance management process,
        - providing opportunities for career development and advancement, and
        - making redeployment decisions.
  
  - **Workplace Emergency Response Information**
    - If an employee has a disability and TrueBlue is aware that, due to that disability, the employee requires an individualized workplace emergency response, information addressing such response will be provided to the employee as soon as practicable after TrueBlue becomes aware of such requirement.
    - In such a case, with the employee's consent, TrueBlue will designate a colleague(s) to provide such individualized assistance and will ensure that this colleague is provided with a copy of employee's individualized emergency response information.
    - TrueBlue will review the individualized workplace emergency response information when (i) the employee moves to a different work location; (ii) the employee's overall accommodations needs or plans are reviewed; and (iii) when TrueBlue reviews its general emergency response policies.
    - TrueBlue is committed to accommodating people with disabilities and will use the following process to identify and meet employee accommodation needs.
  
  - **Individual Accommodation Plan**
    1. Recognize the need for accommodation
      - a. Accommodations may be requested by an employee or identified by an employee's manager or hiring manager
    2. Gather relevant information and assess individual needs

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- a. Employees are expected to be active participants in the accommodation process
  - b. Information will be collected on an employee's functional abilities, but not the nature of the employee's disability
    - i. Employee personal information, including medical information, will be kept secure and handled in a confidential manner; and disclosed only to individuals who need it to perform the accommodation process
  - c. Employees and their managers, in conjunction with support from Human Resources and/or Employee Relations, will work together to find an appropriate accommodation.
    - i. Medical or other experts may be engaged (at the company's expense) to help determine if/how the employee's needs can be accommodated
    - ii. Employees may ask a bargaining agent or other workplace representative to participate in the process, as applicable to the situation
3. Write an individual accommodation plan
    - a. After identifying the most appropriate accommodation(s), details will be documented in a written plan, including:
      - i. What accommodation(s) will be provided
      - ii. How information will be made accessible to the employee
      - iii. Employee emergency information and/or emergency response plan (if applicable)
    - b. Employees will be provided in an accessible format (if required) a copy of the individual accommodation plan, or written reasons for denying accommodation(s).
  4. Implement, monitor and update the plan
    - a. After implementing an accommodation plan, employees and their managers will monitor and review the plan for effectiveness. Employees and their managers will reach a mutual agreement as to how often and when formal reviews and updates to the plan will occur, which will be included in the employee's accommodation plan. If an accommodation is no longer appropriate, employees and their managers will reassess the situation and update the plan. An accommodation plan will also be reviewed and updated if the employee's work location or position changes or if the nature of the employee's disability changes.
- **Return to Work Process**
    1. Employees who are on leave will maintain periodic contact with Leave Administration, Human Resources and/or Employee Relations to assess their ability to return to work and the conditions for their return to work, as well as to address other concerns.

- a. When assessing an employee's condition in preparation for their return to work, medical or other experts may be engaged (at the company's expense) to help determine and clarify the employee's needs and develop a return to work plan. The return to work plan will be included in an employee's individual accommodation plan.
2. Employees will work with Leave Administration, Human Resources and/or Employee Relations, as well as their Manager, to initiate the return to work process and develop a return to work plan.
  - a. Employees with no residual functional limitations will return to their regular position, without any accommodation(s).
  - b. Employees with functional limitations will work with their manager, Human Resources and/or Employee Relations, to find appropriate accommodation(s) and develop and/or revise an individual accommodation plan as appropriate.
3. An Employee's return to work plan will be monitored and evaluated for effectiveness and revised accordingly.

Design of Public Spaces. When TrueBlue builds or makes major modifications to public spaces, we will adhere to the Accessibility Standards for the Design of Public Spaces. When/if there is a problem arise with the accessibility of public spaces, the public will be notified and alternatives will be provided.

Customer Service Standards. Customer Service Standards are addressed in the Accessible Customer Service Policy.

For questions about this IAS Policy or the Company's Accessibility Plan, contact [Hr-advice@trueblue.com](mailto:Hr-advice@trueblue.com) or 1-800-610-8920.