

Sunrise Senior Living
MULTI-YEAR ACCESSIBILITY PLAN
Ontario, Canada

Introduction

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the “*AODA*”). The *AODA* requires Sunrise Senior Living (“Sunrise” or the “Company”) establish, implement, maintain, and document a multi-year accessibility plan which outlines the Company’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements of the Integrated Accessibility Standards (the “IAS”).

This multi-year accessibility plan (the “Accessibility Plan”) outlines the Company’s strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS so the Company may fulfill its commitment as outlined in its Integrated Accessibility Standards Policy (the “Policy”).

Sunrise has taken and will continue to take the necessary steps to comply with the *AODA* requirements, including:

1. Sunrise has developed and implemented a policy governing its provision of goods, services and facilities to persons with disabilities, in accordance with the Customer Service Standards.
2. Sunrise has incorporated its policies with respect to service animals and support persons into its policy referenced in paragraph 1 above.
3. Sunrise has incorporated its procedures for providing notices of temporary disruptions into the policy referenced in paragraph 1 above.
4. Sunrise has provided the required training to its employees, volunteers, individuals who participate in the development of its policies, and all persons who provide goods, services and/or facilities on the Company’s behalf, and will continue to provide such training in accordance with the Customer Service Standard followed by a quiz.
5. Sunrise has developed a feedback process and has incorporated its practices in respect of its feedback process into the policy referenced in paragraph 1 above. The process includes publishing contact information so that feedback can be easily directed to the appropriate individuals.
6. All copies of Sunrise’s documentation required by the Customer Service Standards will be provided in an accessible format or with communication support, upon request.

The chart below sets out the additional standards that Sunrise has met and will continue to maintain, as well as its strategies for meeting the requirements of the IAS on an ongoing basis.

Requirement	Responsible Department	Action Plan	Status
General Accessibility Standards			
<p>Accessibility Policies</p> <p>Create Policies with Statement of Organizational Commitment to meeting the accessibility needs of persons with disabilities in a timely manner.</p> <p>Prepare integrated accessibility policy; individual accommodation and return to work policy; and accessible customer service policy.</p> <p>Make the Company’s policies available to the Public in an accessible format.</p>	<p>Regional Director of Operations and Human Resources</p>	<p>Sunrise has developed and implemented an “Integrated Accessibility Standards Policy” and provides training on the Policy. The Policy includes a Statement of Commitment.</p> <p>Notification about the availability of the Policy is posted on the Company’s website.</p> <p>Sunrise has posted information regarding availability of its policies, in an accessible format, on its website.</p>	<p>Completed and ongoing</p>
<p>Multi-Year Accessibility Plan</p> <p>Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation.</p> <p>Post the accessibility plan on the website and provide the plan in an accessible or alternative format upon request.</p>	<p>Regional Director of Operations and Human Resources</p>	<p>This Multi-Year Accessibility Plan has been completed and is posted on Sunrise’s website.</p>	<p>Completed and ongoing</p>
<p>Post the accessibility plan on the website and provide the plan in an accessible or alternative format upon request.</p>	<p>Marketing and Human Resources</p>	<p>See above.</p>	<p>Completed and ongoing</p>
<p>Review and update the accessibility plan at least once every 5 years.</p>	<p>Regional Director of Operations and Human Resources</p>	<p>The plan will be reviewed in 2028 unless an earlier review is required due to amendments to the <i>AODA</i> or the IAS or because of changes to Sunrise’s policies.</p>	<p>Completed and ongoing</p>

<p>Training</p> <p>All employees & volunteers, policy developers, those providing goods or services on behalf of the organization will be trained in the development of <i>AODA</i> policies.</p> <p>Training must include:</p> <ul style="list-style-type: none"> a) Requirements of the IAS; the <i>Human Rights Code</i> as it pertains to persons with disabilities; and b) <i>AODA</i> policies as required by the IAS. <p>Ensure that contractors providing goods, services and/or facilities on its behalf have received the training required under the IAS.</p> <p>Develop training content and create a training schedule.</p> <p>Retain record of training provided, including the dates of each training and attendance at training on each date.</p>	<p>Regional Director of Operations and Human Resources</p>	<p>Sunrise provides training to ensure employees, volunteers and third-parties (including contractors) who provide goods, services and facilities on behalf of Sunrise and to all persons who participate in the development of Sunrise’s policies.</p> <p>Sunrise provides training to new employees as part of its onboarding process.</p> <p>Human Resources maintains records of the training provides, which includes dates and attendance records.</p>	<p>Completed and ongoing</p>
<p>Information & Communication Standards</p>			
<p>Emergency Plans, Procedures or Public Safety Information</p> <p>If the Company prepares emergency procedures, plans or public safety information and makes the information available to the public, the Company will provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p>	<p>Regional Director of Operations and Human Resources</p>	<p>Sunrise makes its emergency procedures, plans and public safety information available to the public in an accessible format with appropriate communications supports.</p>	<p>Ongoing</p>
<p>Feedback</p>	<p>Regional Director of Operations, Human</p>	<p>Accessible formats and communication supports are provided in respect of Sunrise’s feedback procedures.</p>	<p>Ongoing</p>

<p>The Company will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication supports upon request. A review of feedback processes and accessibility will be completed.</p> <p>The Company will notify the public about the availability of accessible formats and communication supports.</p>	Resources, Marketing	Notification about the availability of accessible formats and communications supports in respect of any processes for receiving and/or responding to feedback is posted on Sunrise’s website and is included in the Policy.	
<p>Accessible Formats and Communications Supports</p> <p>The Company will provide accessible formats and communication supports upon request in respect of information that is publicly available, in a timely manner at a cost that is no more than the regular cost charged to other persons.</p>	Regional Director of Operations, Human Resources, Marketing	<p>Information about Sunrise’s goods, services and facilities is provided in an Accessible Format or with a Communication Support upon request.</p> <p>Employees have received training on the obligation to provide this information in an Accessible Format or with a Communication Support.</p> <p>Notification about the availability of Accessible Formats and Communication supports is provided on Sunrise’s website and it its policies.</p>	Complete and ongoing
<p>Accessible Websites and Web Content</p> <p>New websites and content will comply with WCAG 2.0 Level A.</p> <p>By January 1, 2021, ensure, where practicable, that all internet websites and web content published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.</p>	Marketing	Sunrise’s website is compliant with WCAG 2.0 Level AA to the extent required by the IAS.	Complete and ongoing
<p>Employment Standards</p>			
<p>Emergency Response Information</p> <p>Provide Workplace Emergency Response information for employees who have a disability,</p>	Human Resources	Sunrise provides emergency response information to its staff, in an accessible format. A notification about the availability of individualized emergency response information is posted on Sunrise’s health and safety	Complete and ongoing

<p>if the disability is such that the individualized information is necessary, and if Sunrise is aware of the need for accommodation due to the employee's disability.</p> <p>Provide this information as soon as practicable after becoming aware of the need for accommodation.</p> <p>With consent of the employee, provide workplace emergency response information to the person designated by Sunrise to provide assistance to the employee, should they require it by reason of disability.</p> <p>Review individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when Sunrise reviews its general emergency response policies.</p>		<p>bulletin boards and intranet. Individualized Emergency Response Plan will be filed in the individual's personnel file.</p> <p>Managers have received training on the obligation to provide individualized emergency response information and the requirement that this information be updated as necessary.</p>	
<p>Recruitment</p> <p>Notify employees and public regarding availability of accommodation.</p> <p>Notify selected applicants of availability of accommodations upon request for assessments or selection processes.</p> <p>Notify successful applicants of policies for accommodating employees with disabilities.</p>	<p>Executive Directors, Human Resources</p>	<p>A notification about the availability of accommodation in during the recruitment process is posted on Sunrise's website on the "Career" page and in the online platform it utilizes to recruit employees.</p> <p>A notification about the availability of accommodation in respect of the assessment and selection process is included in the email sent to applicants who are selected to participate in an interview.</p> <p>Information about Sunrise's policies for accommodating employees with disabilities is included in the employment contract and in Sunrise's Employee Handbook, which is provided s provided to employees immediately upon hire.</p>	<p>Complete and ongoing</p>
<p>Inform Employees of Supports and Policies</p> <p>Inform employees of policies used to support employees with disabilities, including policies</p>	<p>Human Resources</p>	<p>Information about Sunrise's policies for accommodating employees with disabilities is included in the Employee Handbook, which is provided to new employees upon hire.</p>	<p>Complete and Ongoing</p>

<p>on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.</p> <p>Provided to new employees as soon as practicable after commencing employment.</p> <p>Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.</p>		<p>Sunrise’s advises employees when there is a material change to any of these policies.</p>	
<p>Accessible Formats and Communications Supports for Employees</p> <p>Upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that:</p> <ul style="list-style-type: none"> (i) information required by the employee to perform his/her job; and (ii) (ii) information generally available to employees in the workplace, is accessible to the employee with a disability. <p>Consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However where the needs of an employee with a disability may be accommodated in various different ways, Sunrise reserves the right to determine the type Accessible Format or Communication Support that will be provided in the circumstances.</p>	<p>Executive Directors; Human Resources</p>	<p>Accessible formats and communication supports are provided to employees upon request and where necessary, are included as part of an employee’s individual accommodation plan.</p> <p>Managers and senior staff have received training on the obligation to provide accessible formats and communication supports and the obligation to consult with employees prior to so doing.</p>	<p>Complete and Ongoing</p>
<p>Documented individual accommodation plans</p>	<p>Human Resources</p>	<p>A policy on the provision of documented individual accommodation and return-to-work plans has been developed and managers have received training on how</p>	<p>Complete and Ongoing</p>

<p>Have documented Individual Accommodation Plan process in place for employees with a disability. The process must include the following elements:</p> <ul style="list-style-type: none"> i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. ii. The means by which the employee is assessed on an individual basis. iii. The manner in which Sunrise can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved. iv. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. v. The steps Sunrise will take to protect the privacy of the employee's personal information. vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 		<p>it is to be implemented when required (see "Individual Accommodation and Return to Work Plan Policy")</p>	
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<p>vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability</p> <p>Where requested, an employee’s individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.</p> <p>Where required, an employee’s individual accommodation plan will include individualized workplace emergency response information.</p>			
<p>Return to Work Process</p> <p>Create and maintain a return-to-work process developed according to the IAS, for an employee who has been absent from work due to a disability and who requires disability-related accommodations in order to return to work.</p> <p>The return to work process must outline the steps Sunrise will take to facilitate the employee’s return to work and will include documented individual accommodation plans as part of the process.</p>	Human Resources	A policy on the provision of documented individual accommodation and return-to-work plans has been developed and managers have received training on how it is to be implemented when required (see “Individual Accommodation and Return to Work Plan Policy”).	Complete and Ongoing
<p>Performance Management</p> <p>Performance management will take into account an employee’s accessibility needs including individual accommodation plans.</p>	Human Resources	Managers have received training on the requirement to take accessibility needs into account when engaging in performance management.	Complete and Ongoing
<p>Career Development and Advancement</p>	Executive Directors; Human Resources	Managers have received training on the requirement to take accessibility needs into account when providing	Complete and Ongoing

<p>Career development and advancement process will take into account accessibility needs.</p>		<p>career development and/or advancement opportunities to employees.</p>	
<p>Redeployment</p> <p>Redeployment processes developed for an employee with a disability will take into account an employee's accessibility needs, as well as individual accommodations plans.</p>		<p>Managers have received training on the requirement to take accessibility needs into account when engaging in redeployment.</p>	<p>Complete and Ongoing</p>
<p>Design of Public Space Standards <i>The following requirements only apply to public spaces that are newly constructed or redeveloped on and after January 1, 2017.</i></p>			
<p>General Standard</p> <p>Meet the standards for the design of public spaces when building or redeveloping public spaces.</p> <p>Procedures for preventative and emergency maintenance of accessible elements and procedures for dealing with temporary disruptions of accessible elements</p>	<p>Construction, Development; Facilities Facilities</p>	<p>Sunrise is aware of the requirements regarding the Design of Public Spaces under the AODA. Sunrise is committed to meeting the requirements under the standard should it construct or reconstruct any public spaces as according to the AODA.</p>	<p>Complete and ongoing</p>
<p>Exterior Paths of Travel</p> <p>Ensure that any exterior paths of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Places Standards.</p>	<p>Construction, Development; Facilities Facilities</p>	<p>The Company has not newly developed or reconstructed any exterior paths of travel since January 2017 but is aware of the requirements of the Design of Public Spaces Standards should it do so in the future.</p>	<p>Complete and ongoing</p>
<p>Off-Street Parking</p> <p>Ensure that when Sunrise constructs new or redevelops off-street parking facilities that it intends to maintain, the off-street parking facilities meet the requirements of the Design of Public Places Standards.</p> <p>Off-street parking is a space where you can park your vehicle temporarily that is not on a</p>	<p>Construction, Development; Facilities Facilities</p>	<p>The Company has not newly developed or reconstructed any off-street parking since January 2017 but is aware of the requirements of the Design of Public Spaces Standards should it do so in the future.</p>	<p>Complete and ongoing</p>

public road or street			
<p>Maintenance</p> <p>Ensure accessibility plans include:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces. 2. Procedures for dealing with temporary disruptions when accessible elements required are not in working order. 	Construction, Development; Facilities Facilities	The Company is aware of the maintenance requirement should it newly develop or reconstruct any public spaces covered by the Design of Public Spaces Standards in the future.	Complete and ongoing
<p>Service Counters and Waiting Areas</p> <p>Ensure that Sunrise meets the requirements of the Design of Public Places Standards in respect of the following:</p> <ol style="list-style-type: none"> 1) All newly constructed service counters and fixed queuing guides. 2) All newly constructed or redeveloped waiting areas. 	Construction, Development; Facilities Facilities	The Company has not newly constructed or redeveloped any service counters, fixed queuing guidelines or waiting areas but is aware of the requirements of the Design of Public Spaces Standards should it do so in the future.	Complete and ongoing
Customer Service Standards			
<p>Customer Service Policy</p> <p>Develop, implement and maintain policies governing how Sunrise provides goods, services or facilities to persons with disabilities in compliance with the requirements of the Customer Service Standard.</p> <p>Ensure policies address use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so.</p>	Regional Director of Operations	<p>Sunrise has developed and implemented an “Accessible Customer Service Policy” and provides training on the Policy.</p> <p>Notification about the availability of the Customer Service Standards Policy is posted on the Sunrise’s website.</p>	Complete and ongoing

<p>Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.</p> <p>Notify persons to whom it provides goods, services or facilities that the documents are available upon request.</p>			
<p>Service Animals</p> <p>Allow a person with a disability to be accompanied by a service animal while on organization’s premises and to keep the animal with him or her, unless the animal is otherwise excluded by law.</p> <p>If service animal is excluded by law, ensure other measures are available to enable a person with a disability to obtain, use or benefit from the organization’s goods, services or facilities.</p> <p>Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.</p> <p>Notify persons to whom it provides goods, services or facilities that the documents are available upon request.</p>	<p>Regional Director of Operations, Executive Director</p>	<p>Sunrise’s Accessible Customer Service Policy addresses the Company’s obligations with respect to service animals and guide dogs and employees receive training with respect to these obligations.</p> <p>Sunrise is not aware of any current restrictions specific to its premises that would serve to exclude a Service Animal or Guide Dog.</p> <p>A notification about the availability of the Policy is posted on Sunrise’s website.</p>	<p>Complete and ongoing</p>
<p>Support Persons</p> <p>Permit a person with a disability to be accompanied by their support person and that the person with a disability is not prevented from having access to the support person while on the premises.</p> <p>Provide advance notice of fees charged for</p>	<p>Regional Director of Operations, Executive Director</p>	<p>Sunrise’s Accessible Customer Service Policy addresses the Company’s obligations with respect to support persons and employees receiving training with respect to these obligations.</p> <p>A notification about the availability of the Policy is posted on Sunrise’s website.</p>	<p>Complete and ongoing</p>

<p>support person.</p> <p>Before requiring the presence of a support person, consult with person with a disability and consider the health and safety implications based on available evidence. If requiring presence of support person, waive fees for support person.</p> <p>Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.</p> <p>Notify persons to whom it provides goods, services or facilities that the documents are available upon request.</p>			
<p>Notice of Temporary Disruptions</p> <p>Provide notice of temporary disruptions to facilities or services used by persons with disabilities to access organization’s goods, services or facilities.</p> <p>Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p> <p>Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.</p> <p>Notify persons to whom it provides goods, services or facilities that the documents are available upon request.</p>	<p>Executive Director</p>	<p>Sunrise’s Accessible Customer Service Policy addresses the Company’s obligations with respect to notify of temporary disruptions and employees receive training with respect to these obligations.</p> <p>A notification about the availability of the Policy is posted on Sunrise’s website.</p>	<p>Complete and ongoing</p>
<p>Training</p> <p>Ensure training on the provision of goods, services or facilities to persons with disabilities is provided to everyone who:</p>	<p>Regional Director of Operations, Human Resources, Executive Director</p>	<p>Sunrise provides training through its online training channel to existing employees, volunteers, any third-parties who provide goods, services and facilities on behalf of Sunrise and to all persons who participate in the development of Sunrise’s policies.</p>	<p>Complete and ongoing</p>

<ul style="list-style-type: none"> • is an employee or volunteer • provides goods, services or facilities on organization’s behalf; • participates in developing organization’s policies <p>Ensure training includes review of purpose of <i>AODA</i>, requirements of the Customer Service Standard and instruction on:</p> <ul style="list-style-type: none"> • how to interact and communicate with persons with various types of disability • how to interact with persons using assistive devices or requiring the assistance of a service animal or support person • how to use equipment or devices available on premises or provided by organization that may help with the provision of goods, services or facilities to a person with a disability • what to do if person with a particular type of disability is having difficulty accessing the organization’s goods, services or facilities <p>Prepare a document describing organization’s training, and on request give a copy of document(s) to any person.</p> <p>Notify persons to whom the organization provides goods, services or facilities of the availability of same upon request.</p> <p>Maintain records of when and to whom training is provided.</p>		<p>Sunrise provides training to new employees as part of the onboarding process.</p> <p>Sunrise’s Accessible Customer Service Policy addresses the Company’s obligations with respect to training.</p> <p>A notification about the availability of the Policy is posted on Sunrise’s website.</p> <p>Sunrise maintains records of the training provided.</p>	
<p>Feedback Process</p> <p>Establish a process for receiving and responding to feedback about the manner in which organization provides goods, services or</p>	<p>Regional Director of Operations, Human Resources, Marketing</p>	<p>Sunrise has established a feedback process which is detailed in its Accessible Customer Service Policy. Employees have received training on the Policy and feedback process.</p>	<p>Complete and ongoing</p>

<p>facilities to persons with disabilities.</p> <p>Process must be accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports upon request.</p> <p>Make feedback process available to the public.</p> <p>Prepare one or more written documents describing the policies and on request, give a copy of any such document to any such person.</p> <p>Notify persons to whom it provides goods, services or facilities that the documents are available upon request.</p>		<p>A notification about the feedback process is provided on Sunrise's website.</p>	
<p>Accessible Formats & Communication Supports</p> <p>Provide, or arrange for the provision of, information in document(s) describing policies with respect to the Customer Service Standards in an accessible format or with communication supports upon request in a timely manner that takes into account the person's accessibility needs and at no additional cost.</p> <p>Consult with person to determine suitability of format or support.</p>	<p>Regional Director of Operations, Executive Director, Marketing</p>	<p>Sunrise's Accessible Customer Service Policy addresses its obligations with respect to accessible formats and communication supports. Employees receive training with respect to these obligations.</p> <p>Employees have received training on the Policy and feedback process.</p> <p>A notification about the feedback process is provided on Sunrise's website.</p>	<p>Complete and ongoing</p>