

POLICIES

Applies to

This policy applies to all employees, volunteers, agents, independent contractors and sub-contractors of Cushman & Wakefield (“the Company”) and its subsidiaries who deal with the public or other third parties that act on behalf of the Company, including when the provision of goods and services occurs off the premises of the Company such as in: delivery services, call centers, vendors, drivers, catering and third-party marketing agencies. The elements of the policy that are specified in this document are meant to satisfy minimum legislative standards and are not intended to limit the ability of the various divisions, departments or subsidiaries. Development of additional policies and procedures that strengthen compliance with this policy is encouraged.

The section of this policy that addresses the use of guide dogs and service animals only applies to the provision of goods and services that take place at premises owned, leased and/or operated by the Company.

Region	Canada
Country	Canada
Role	Employee
Contract Type	Employee

Executive Summary

The policy is intended to meet the requirements with the Ontario Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”), the Accessibility for Manitobans Act (“AMA”), 2013 and the Nova Scotia Accessibility Act.

Cushman & Wakefield (“the Company”) is committed to excellence in serving all customers and clients and respecting the needs of employees, including those with disabilities. We understand that employees and customers with disabilities may have differing needs. Our Accessibility Policy takes into consideration these specific needs and we strive to accommodate with mutual respect, cooperation and understanding.

Definitions

Accessible Formats: including but not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

Assistive Devices: a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that employees, independent contractors and customers bring with them such as a wheelchair, walker or a personal oxygen mask that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Barrier: anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including:

- a physical barrier,
- an architectural barrier,
- an informational or communications barrier,
- an attitudinal barrier,
- a technological barrier, or
- a policy or practice "obstacle".

Communication Supports: including but not limited to sign language, plain language and other communication supports that facilitate effective communications.

Disability: This is a broad definition that include disabilities of different severity from visible to non-visible disabilities and ones with effects that may come and go. It includes any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- Diabetes mellitus,
- Epilepsy,
- A brain injury,
- Any degree of paralysis,
- Amputation,
- Lack of physical co-ordination,
- Blindness or visual impairment,
- Muteness or speech impediment,
- Physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device,
- A condition of mental impairment or a developmental disability,
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- A mental disorder, and
- An injury or disability for which benefits were claimed or received under the provincial Worker's Compensation Board.

Policy Text

Responsibilities

- a) Management is responsible to ensure that:
 - all employees are aware of and abide by all policies and any subsequent amendments.
 - they support the corporate liability for compliance with legislative requirements including ensuring the relevant training is completed.
- b) Employees, independent contractors, agents, and volunteers are responsible to ensure that:
 - they review and understand this policy.
 - they participate and cooperate with all parties to facilitate workplace accommodation.
 - they take part in the mandatory training that is required.
- c) Approving authority is responsible to ensure that:
 - this policy accurately reflects the procedures by which C&W develops policies.
 - exceptions to this policy must be fully documented and receive the same critical approvals as the original policy.

Policy Requirements:

Integrated Accessibility Standard Regulations (IASR) Policy

The Integrated Accessibility Standard Regulation (Regulation 191/11) (the "IASR") under the AODA provides standards for private sector organizations to increase accessibility for persons with disabilities in various areas. The standards that are applicable to the Company include:

- Information and Communication Standards
- Employment Standards
- Customer Service Standards

- Design of Public Spaces Standards

Accessibility Plan

The Company's Multi-Year Accessibility Plan (the "Accessibility Plan") outlines a phased-in strategy to prevent and remove barriers from its workplace to improve opportunities for persons with disabilities and to address the current and future requirement of the accessibility legislation.

The Accessibility Plan will be reviewed and updated at least once every five years.

The Company will provide the Accessibility Plan and an annual status report in an accessible format upon request.

Monitoring / Contraventions

The failure to comply with accessibility regulations can result in administrative penalties for the Company. Supervisors and managers must monitor practices on an ongoing basis to ensure compliance. Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

Training

The Company will ensure that training is provided to all employees, independent contractors and volunteers, so that it aligns with the requirements of the accessibility standards referred to in the IASR, as well as training on the provincial Human Rights legislation as it pertains to persons with disabilities. The appropriate training records will be maintained for compliance reporting.

Information and Communication Standards

Feedback: Feedback on how services were delivered to people with disabilities is invited, forwarded to the appropriate personnel, responded to, documented and tracked. Feedback will be accepted in accessible formats and with other communication supports as required.

Accessible Formats and Communication Supports: The Company will upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports will be provided in a timely manner, taking into account the individual person's accessibility needs.

Accessible Website and Web Content: The Company will ensure that its websites and content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and then increasing to Level AA in accordance with the legislated deadlines, as practicable.

Employment Standards

Recruitment: The Company is committed to fair and accessible employment practices. Employees and external applicants will be notified about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process: Job applicants are notified when they are individually selected to participate in the assessment or selection process and that accommodation for disabilities are made available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Company will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

Notice to Successful Applicants: When presenting offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports: The Company will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing the employment.

Accessible Formats and Communication Supports for Employees: Upon the request of an employee with a disability, the Company will consult with the employee to provide, or arrange for accessible formats and communication supports for:

- information that is needed to perform his/her job, and
- information that is generally available to other employees.

In order to determine the suitability of an accessible format or communication support, the Company will consult with the employee making the request. Accessible formats and communication supports regarding general workplace information will also be provided to employee with disabilities.

Workplace Emergency Response Information: The Company provides employees with disabilities with individualized workplace emergency response information when the employee's disability is such that individual information is necessary in order to meet the individual's needs in an event of an emergency situation.

Documented Individual Accommodation Plans: The Company will maintain a written process for the development of documented individual accommodation plans for employees with disabilities as we are made aware. If requested, information regarding accessible formats and communication supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided. The Company will implement and maintain measures effective to maintain the privacy of its employees with disabilities.

Return to Work Process: The Company will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps the Company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

The return to work process will not replace, hinder or override any other return to work process created by or under any other statute (i.e. the Workplace Safety Insurance Act, 1997).

Performance Management, Career Development and Advancement and Redeployment: The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance

management, providing career development and advancement to employees, or when redeploying employees.

Customer Service Standards (Previously From "Accessibility Standard for Customer Service Policy")

General Principles

In accordance with the aligned provincial Accessibility Standards for Customer Service, this policy addresses the following:

- a) The Provision of Goods and Services to Persons with Disabilities;
- b) The Use of Assistive Devices
- c) The Use of Guide Dogs and Service Animals
- d) The Use of Support Persons
- e) Notice of Service Disruptions
- f) Customer Feedback
- g) Training
- h) Notice of Availability and Format of Required Documents

a) The Provision of Goods and Services to Persons with Disabilities

The Company will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

b) The Use of Assistive Devices

Persons with disabilities may use their assistive devices when accessing goods or services provided by the Company.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, the furniture in a meeting room would be rearranged to ensure there is enough room for assistive devices.

c) The Guide Dogs and Service Animals

A person with a disability that is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Care and Control of the Animal: The person that is accompanied by a guide dog and/or service animal is responsible for maintaining care and control of the animal at all times.

- *Recognizing a Guide Dog and/or Service Animal:* If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, the Company may request verification from the customer. Verification may include: most service animals are identified by a "uniform" such as a harness or vest or there may be a letter from a regulated medical professional verifying that the animal is required for reasons related to the disability.

d) Support Persons

If a person with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the person is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, the Company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the person, prior to any conversation where confidential information might be discussed.

When support persons are required (i.e. sign language interpreters, real-time captioners, and attendants) for the Company's sponsored meetings, consultations or events, the Company will arrange to pay support persons directly for their time.

e) Notice of Service Disruptions

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions to our facilities or services that impact our persons with disabilities, reasonable efforts will be made to provide advance notice.

In the event that a notification needs to be posted, the following information will be included:

- Goods or services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration
- A description of alternative services or options, if available

When disruptions occur, the Company will provide notice by:

- posting notices in visible places regarding an office closure or equipment maintenance issue (e.g. such as elevator service);
- directly contacting those persons, impacted by the disruption.

Notice will include the reason for the disruption, the anticipated duration of the disruption and alternative services or options.

f) Customer Feedback

The Company shall provide customers with the opportunity to provide feedback on the service we have provided to customers with disabilities.

Customers can submit feedback to the Regulatory and Compliance Manager at (416) 862-0611 or HRServices@cushwake.com.

Feedback may also be submitted by mail directed to Human Resources:

Cushman & Wakefield ULC
Human Resources Dept. 161 Bay Street, Suite 1500,
P.O. Box 602
Toronto, ON, M5J 2S1

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted in a format that is accessible to the complainant.

g) Training / Communication Training will be provided to:

- all employees, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company; for example: brokers, third party subcontractors, receptionists.

- those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in the applicable provincial accessibility legislation, regardless of the format, training will cover the following:

- a review of the purpose of applicable provincial accessibility legislation.
- a review of the requirements of the applicable provincial customer service regulation.
- instructions on how to interact and communicate with people with various types of disabilities.
- instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- instructions on what to do if a person with a disability is having difficulty accessing your services.
- the Company policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

The Company shall provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

The Company will keep a record of training that includes the dates training was provided and the names of employees who attended the training. This information will be kept in the Learning Management System (LMS) and tracked for review annually.

h) Notice of Availability and Format of Documents

The Company shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the customer's disability. Notification will be provided by posting the information in a visible place owned and operated by The Company, The Company's website and/or any other reasonable method.

i) Interaction & Communication with Customers who have Disabilities

When communicating with customers with disabilities, the Company encourages all employees, independent contractors and volunteers to take into consideration their disability.

Design of Public Spaces (Built Environment)

The Company will comply with the AODA Design of Public Spaces Standard (Accessibility Standards for the Built Environment) when undertaking new construction and redevelopment of public spaces in the following areas:

- Outdoor public eating areas
- Exterior paths of travel
- Accessible parking
- Obtaining services
- Maintenance of accessible elements

The Company will ensure that the Accessibility Design Standards reflect the AODA Built Environment Standards.

Availability of Documents

To find out more information regarding accessibility at C&W or the availability of documents, please contact Human Resources at HRServices@cushwake.com

Last Revision Date

This policy is effective immediately unless it is subject to prior consultation under applicable national laws.