

ADT SECURITY SERVICES CANADA, INC.

Multi-Year Accessibility Plan

1. BACKGROUND & PURPOSE

The purpose of the goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with disabilities.

The *Integrated Accessibility Standards* (the “IAS”) is a regulation under the Act the purpose of which is to ensure accessibility for persons with disabilities in the areas of (i) Information and Communication, (ii) Employment, (iii) Transportation and (iv) Design of Public Spaces.

ADT Security Services Canada, Inc. (“ADT” or the “Company”) has developed a policy that identifies how ADT currently achieves and will continue to achieve accessibility by meeting the requirements of the IAS and by preventing and eliminating barriers faced by persons with disability (the “Policy”).

The purpose of this multi-year accessibility plan (“Accessibility Plan”) is to create a roadmap that describes in more detail, the steps ADT will take to meet the accessibility objectives set out in the Policy and the timeline in which these steps will be taken. The Accessibility Plan will help ADT ensure accessibility is incorporated into its regular business operations and its future development plans.

2. STATEMENT OF COMMITMENT

ADT is committed to developing, implementing and maintaining policies, practices and procedures aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

3. COMPLIANCE WITH EXISTING LAW

Nothing in the Accessibility Plan or Policy is intended to replace or negate existing laws regarding accessibility for persons with disabilities including but not limited to the *Human Rights Code* and the *Workplace Safety and Insurance Act* (“Accessibility Legislation”).

The compliance deadlines established in this Accessibility Plan correspond with the deadlines set out in the IAS. ADT is working towards compliance in accordance with those deadlines. However, in advance of the compliance deadlines established by the IAS and this Accessibility Plan, ADT will continue to comply with its legal obligations under all applicable Accessibility Legislation.

4. REVIEW

The Accessibility Plan must be reviewed and updated at least once every 5 years but may be reviewed more frequently depending on need.

5. TRANSPARENCY

As of January 1, 2014 the Accessibility Plan will be posted on ADT's website. The Accessibility Plan will be provided upon request to any member of the public in a hard, electronic or other Accessible Format.

6. APPLICATION

Except as otherwise limited herein, this Accessibility Plan applies to ADT's operations in Ontario including but not limited to:

- i. All employees, volunteers and Contractors who provide goods, services or facilities on behalf of ADT to customers in Ontario.
- ii. Any person who participates in the development of ADT's policies, practices and procedures respecting ADT's Ontario operations.

7. IMPLEMENTATION & REVIEW

Responsibility for the implementation, review and update of the Accessibility Plan is shared between departments as follows:

- The **Legal Department** is responsible for the development and maintenance of policies required by the Act and this Accessibility Plan.
- The **Human Resources Department** is responsible for compliance with the Employment Standards and for developing and implementing the required training programs.
- The **Digital Marking Department** is responsible for implementing the web accessibility requirements.
- The **Customer Service Department** is responsible for compliance with the Information and Communications Standards save and except for the web accessibility requirements and for the maintenance and implementation of the Accessible Service Policy developed in compliance with the Customer Service Standards.
- The **Business Operations Group** is responsible for compliance with the Design of Public Spaces Standards.

8. DEFINITIONS

- i. **Accessible Formats** - may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- ii. **Communication Supports** - may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- iii. **Contractor** – means an independent contractor, agent, consultant or other third party engaged by ADT to provide goods, services or facilities on its behalf.
- iv. **Disability** – means:
 - 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
 - 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
- v. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- vi. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- vii. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff, when a particular job or department has been eliminated.
- viii. **Staff** – means employees and volunteers of ADT.
- ix. **Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.

- x. ***Web Content Accessibility Guidelines (“WCAG”)*** – means the international standard for making websites and web content accessible to people with a wide-range of disabilities. The WCAG contain two levels of compliance, Level A and Level AA.

9. ACCESSIBILITY CUSTOMER SERVICE

ADT strives to deliver its security products and services in a manner that respects the dignity and independence of persons with disabilities. ADT is also committed to ensuring everyone has the same opportunity to access its offerings and benefit from the same services, in the same place and in a similar way.

To this end ADT has developed a policy that addresses the accessibility requirements contained in the *Accessibility Standards for Customer Service* (“Customer Service Standard). This “Accessible Service Policy” is posted on ADT’s website at: <http://www.adt.ca/en/about-adt/legal/accessible-service-policy>.

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10. GENERAL ACCESSIBILITY STANDARDS UNDER IAS

I. Training

Policy Statement:

By January 1, 2015 (the “Compliance Deadline for Training”), ADT will provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.

Training will be provided on:

- i. the requirements of the IAS;
- ii. the *Human Rights Code* as it pertains to persons with disabilities; and
- iii. the AODA Policies as required by the IAS.

The content of the training will be applicable to the individual’s duties.

Employees hired and volunteers accepted after the Compliance Deadline for Training will receive the required training as soon as practicable.

ADT will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

ADT will ensure that contractors providing goods, services and/or facilities on the Company’s behalf have received the training required under the IAS.

Accessibility Plan:

i. Content of Training

ADT will develop a single training program for all employees and volunteers. The training program will address the *Human Rights Code* as it pertains to persons with disabilities and the requirements of the IAS.

Specialized training will be provided as necessary (*i.e.* focused training on the Design of Public Spaces Standards will be provided to appropriate individuals in the Business Operations Group).

ii. Format of Training

Managers and persons above the level of manager will receive in-person training. ADT will develop online training for all other Staff.

iii. Training for Contractors

ADT commonly engages Contractors to provide goods and services to its customers on its behalf. By the Compliance Deadline for Training ADT will have in place a process for ensuring that all Contractors receive the training required under the IAS.

11. INFORMATION AND COMMUNICATION STANDARDS

I. Feedback Procedures

Policy Statement:

By January 1, 2015 ADT 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 Communications Supports, upon request.

ADT will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

Accessibility Plan:

ADT accepts feedback from employees, customers and the public in a number of different ways including but not limited to: (i) in person, (ii) over the telephone (*i.e.* ethics line), (iii) in writing (*i.e.* mail or email) *etc.*

In addition to the above, ADT will accommodate requests to provide or to receive responses to feedback in an Accessible Format or with Communication Supports.

II. Accessible Formats & Communication Supports

Policy Statement:

By January 1, 2016 ADT will, upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.

Accessibility Plan:

i. Exempt Information

The Information and Communication Standards do not apply to (i) products and product labels; (ii) Unconvertible information or communications; and (iii) information that ADT does not control directly or indirectly through a contractual relationship.

Should ADT determine that information or a communication is Unconvertible it will explain why this is the case and provide the person making the request with a summary of the said information or communication.

ii. Non-Exempt Information

Examples of the type of information that ADT will provide in an Accessible Format or with Communication Supports include the following:

- Invoices
- Brochures or information packages about ADT's goods and services

iii. Consultation

A Staff member who receives a request from a customer or the public for information in an Accessible Format or with Communication Supports should consult with the requesting individual to determine how the information may best be made accessible.

A Contractor who receives a request from a customer or the public for information in an Accessible Format or with Communication Supports should report the request to their contact at ADT immediately.

Management at each operating unit is responsible for assisting Staff with the consultation process where required.

iv. Providing Accessible Formats At No Additional Cost

ADT may not have Accessible Formats immediately available upon request. Accessibil-IT is a company that specializes in converting written documentation into accessible formats (i.e. pdf document that can be read by a screen reader, Braille etc.)

If a customer makes a request for accessible documentation a manager may contact Accessibil-IT to arrange for the Accessible Format:

Wendy Lockyer, Senior Accessibility Consultant
Accessibil-IT
2275 Upper Middle Road East
Suite 101
Oakville, Ontario, L6H 0C3
+1 905 491 6875 Telephone:
+1 905 491 6801 FAX:
E-mail: info@accessibilit.com

Accessible Formats and Communication Supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.

III. Accessible Websites and Web Content

Policy Statement:

By the Initial Website Compliance Deadline ADT will ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

By the Final Website Compliance Deadline ADT will ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.

When determining whether meeting the requirements of this section is practicable ADT will consider: i. the availability of commercial software or tools required to achieve web accessibility; and ii. the impact meeting the requirements of this section will have on projects planned before January 1, 2012.

The commitment to provide accessible websites and web content only applies to websites and web content that ADT controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

Accessibility Plan:

i. ADT's American Website

ADT operates a website to service its customers in the United States. ADT does not currently have any plans to make significant changes or updates to its American website.

ii. ADT's Canadian Website

ADT operates a website to service its customers in Canada (the "Canadian Website"). This website is at <http://www.adt.ca/en/home-security>.

ADT is currently considering a significant refresh of its Canadian Website to take place in or around February/March 2014. As part of this refresh ADT intends to exceed the minimum requirements of the IAS by ensuring compliance with the WCAG 2.0 Level AA save and except for the (a) success criteria 1.2.4 Captions (Live), and (b) success criteria 1.2.5 Audio Descriptions (Pre-recorded) both of which are not required under the IAS.

12. EMPLOYMENT STANDARDS

The Employment Standards only apply to employees of ADT. They do not apply to volunteers, other unpaid individuals or Contractors.

I. Recruitment/Selection/Assessment

Policy Statement:

By January 1, 2016 ADT will notify its employees and the public of the availability of accommodation during the recruitment process. ADT will further notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request in relation to the assessment or selection process if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, ADT 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.

Accessibility Plan:

i. Notification to the Public & External Applicant: Accommodation During Recruitment

This Accessibility Plan posted on ADT's website will serve as notice to the public of the availability of accommodation during the recruitment process.

ADT occasionally posts open positions on job search websites and/or in the newspaper. Such postings will include a notification of the availability of accommodation during the recruitment process.

ii. Notification to Employees: Accommodation During Recruitment

ADT uses a website called Taleo to notify existing employees of job openings within the Company. Notification of the availability of accommodation during the recruitment process will be included in any job posting on Taleo.

iii. Notification: Accommodation During Assessment & Selection

ADT employs different assessment and selection processes depending on the position for which it is hiring. Assessment and section process may include but are not limited to standard interviews and skills tests.

Where an applicant is individually selected to participate in any assessment or selection process ADT will notify the applicant of the availability of accommodation in respect of same.

Where, by reason of a disability, an applicant requests accommodation in respect an assessment or selection process, ADT will consult with the applicant for the purposes of determining an appropriate accommodation. ADT reserves the right to require the applicant to provide medical documentation in support of the need for accommodation.

Where ADT determines an applicant, due to a disability, does require accommodation during the assessment and selection process, ADT will provide accommodation up to the point of undue hardship.

iv. Use of External Recruitment Agencies

ADT uses recruitment agencies in Canada and the United States to recruit for certain positions. Where ADT retains a recruitment agency it will ensure that an obligation to notify applicants about the availability of accommodation during the recruitment, assessment and selection process is included in its service contract.

II. Notice to Successful Applicants

Policy Statement:

By January 1, 2016 ADT will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

Accessibility Plan:

ADT will notify successful candidates for employment of its policy regarding the accommodation of employees with disabilities in its offer letters and/or contracts of employment.

III. Informing Employees of Supports

Policy Statement:

By January 1, 2016 ADT will inform its 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.

ADT will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.

Accessibility Plan:

ADT will post a notification informing employees of the availability of accommodation during employment as well as its policies for the development of documented individual accommodation plans and return to work plans on its internal employee intranet. ADT will update this posting as necessary.

IV. Accessible Formats and Communication Supports for Employees

Policy Statement:

By January 1, 2016 ADT will, 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 (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 with a disability.

ADT will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, ADT reserves the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.

Accessibility Plan:

A request for the provision of information in an Accessible Format and/or with a Communication Support may be made to the employee's immediate supervisor or the Human Resources Department. Such requests will be addressed in accordance with ADT's regular procedure for accommodating employees with disabilities which includes the development of a documented individual accommodation plan in consultation with the employee.

Where the provision of information in an Accessible Format is required, ADT may utilize the services of Accessibil-IT or another service provider as may be appropriate in the circumstances.

V. Workplace Emergency Response Information

Policy Statement:

If an employee has a disability and ADT 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 ADT becomes aware of such requirement.

In such a case, with the employee's consent, ADT 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.

ADT 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 ADT reviews its general emergency response policies.

Accessibility Plan:

i. Existing Employees

A notification similar regarding the availability of individual emergency response information as well as instructions on how to access the Emergency Response Plan applicable to the employee's work location will be posted on ADT's internal employment intranet.

ii. New Employees

Information regarding the availability of individual emergency response information as well as a copy of the Emergency Response Plan applicable to the employee's work location is included in employment contracts/offer letters.

VI. Documented Individual Accommodation Plans

Policy Statement:

By January 1, 2016, ADT will have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:

- 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 ADT 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 ADT 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.
- vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.

Where required, an employee's individual accommodation plan will include individualized workplace emergency response information.

Accessibility Plan:

ADT is in the process of creating a written policy on the development of Individual Accommodation Plans and will have completed this policy by the Compliance Deadline.

VII. Return to Work Process

Policy Statement:

By January 1, 2016, ADT will have a documented a 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 will outline the steps ADT will take to facilitate the employee's return to work and will consider any documented individual accommodation plan that may exist.

Accessibility Plan:

ADT currently has a written process for returning employees to work who are absent due to a workplace illness or injury. This existing process, with minor amendments, will be used to facilitate the return to work of any employee who is absent due to a disability.

VIII. Performance Management

Policy Statement:

By January 1, 2016, ADT will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

Accessibility Plan:

Managers are responsible for evaluating employee performance. Managers will receive training with respect to their obligation under the *Human Rights Code* not to discriminate against an employee on the basis of disability.

IX. Career Development and Advancement

Policy Statement:

By January 1, 2016, ADT will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to its employees with disabilities.

Accessibility Plan:

Managers are responsible for evaluating employee performance and when opportunities arise, identifying candidates deserving of consideration for career advancement.

Managers will receive training with respect to their obligation under the *Human Rights Code* not to discriminate against an employee on the basis of disability.

X. Redeployment**Policy Statement:**

By January 1, 2016, ADT will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

Accessibility Plan:

ADT personnel responsible for Redeployment will receive training with respect to their obligation under the *Human Rights Code* not to discriminate against an employee on the basis of disability.

13. DESIGN OF PUBLIC SPACES STANDARDS

Policy Statement:

ADT will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017. For further information on existing or planned projects to redevelop or construct new public spaces see ADT's Accessibility Plan.

Accessibility Plan:

ADT does not have current plans to construct or redevelop any public spaces covered by the IAS. However, should ADT plan to do so in the future it will ensure that all building/architectural plans incorporate the requirements of the IAS?

14. QUESTIONS ABOUT THE POLICY OR ACCESSIBILITY PLAN

For more information about the Policy or ADT's Accessibility Plan please contact:

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