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This policy provides the overarching framework to guide the review and development of FirstOntario's policies, standards, procedures, and guidelines to comply with the Integrated Accessibility Standards, Ontario Regulation 191/11, and the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Commitment Statement

FirstOntario is committed to providing an environment and services that are welcoming, accessible, and inclusive for all persons with disabilities. FirstOntario services will be provided to persons with disabilities in a way that is respectful of their dignity and independence. This commitment will be integrated wherever possible and will ensure that persons with disabilities benefit from the same services, in the same place, and in a similar way as other FirstOntario members.

FirstOntario is committed to offering a barrier-free environment and meeting the requirements of existing legislation. FirstOntario is also committed to its own policies and objectives related to identifying, removing, and preventing barriers for persons with disabilities that may interfere with their ability to interact with the credit union.

FirstOntario is committed to ensuring that every employee and member receives equitable treatment with respect to employment and services, without discrimination, and receives accommodation, where required, in accordance with the provisions of the Ontario Human Rights Code, the AODA, and its regulations. FirstOntario will meet the accessibility needs of persons with disabilities in a timely manner.

Policy Application

This policy applies to all individuals entitled to the protections set out in the AODA, and its regulations, including members and employees of FirstOntario.

Disability Definition

The AODA defines "disability" as:

- 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;
- 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; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Where required, FirstOntario will consult with the individual who has a disability to understand their specific accessibility needs and make all reasonable efforts to meet those needs in a timely manner.

Accessibility Objectives

To achieve our accessibility objectives, FirstOntario follows a Multi-Year Accessibility Plan which documents FirstOntario's operational approach to comply with the applicable standards of the Integrated Accessibility Standards Regulation (Regulation 191/11) (the "IASR"). The five standards within the IASR include Customer Service, Information and Communication, Employment, Transportation, and Built Environment - Design of Public Spaces. The Transportation standard is not applicable to FirstOntario since we do not offer or provide transportation services.

FirstOntario's Multi-Year Accessibility Plan, this policy, and related policies and procedures are utilized to prevent and remove barriers to accessibility and to meet the requirements under the AODA and its regulations. The Multi-Year Accessibility Plan is reviewed and updated at least once every five years.

Policy Administration

Requests for advice and assistance in administering or interpreting this policy should be directed to Human Resources. FirstOntario reserves the right to rescind and/or amend this policy and all credit union policies at its discretion at any time.

Policy Review & Approval

Annually, this policy including any recommended changes must be approved by the Board of Directors. This policy must be reviewed by the Governance Committee prior to going to the Board for final approval.

Per the Internal Audit Services (IAS) Charter approved by the Board of Directors, IAS will periodically conduct independent assessments of the adequacy and effectiveness of this policy.

Related Policies

- AODA Member Service Policy
- Accessibility for Ontarians with Disabilities Act, 2005: http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm

Subsidiaries

This policy applies to all subsidiaries and divisions of FirstOntario Credit Union unless a separate policy has been implemented to provide direction in this area.

Market Conduct Code

FirstOntario has pledged to support and follow the Market Conduct Code (The Code) as required by the Financial Services Regulatory Authority of Ontario (FSRA). The policy herein has been reviewed and has been

determined to be compliant with the requirements of The Code. Please refer to FirstOntario's Market Conduct Code Policy for more information.