



SMARTCENTRES[®]
REAL ESTATE INVESTMENT TRUST

“Where Forward People thinking foster Growth and Success”

Accessibility Policies and Multi-Year Accessibility Plan

Updated December 2020

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Accessibility Policies and Multi-Year Accessibility Plan

SmartCentres' Multi-Year Accessibility Plan outlines the policies and initiatives that will be implemented to improve opportunities for people with disabilities.

1. Statement of Commitment

SmartCentres is committed to providing equitable access and high-quality facilities and/or services by meeting the needs of our diverse and valued Associates and customers. To this end, SmartCentres will ensure that it is compliant with the Accessibility for Ontarians with Disabilities Act (AODA), 2005, which aims to remove barriers that impact individuals with a disability. Through compliance, SmartCentres will endeavour to provide all individuals with equal access to our facilities and/or services while allowing individuals with a disability to maintain their independence, dignity, and integration.

2. Multi-Year Accessibility Plan Overview

SmartCentres has developed a strong foundation of accessibility planning in order to remove barriers and ensure real and effective change for people with disabilities, and is eager to carry this commitment forward with the implementation of our Multi-Year Accessibility Plan.

Our Multi-Year Accessibility Plan provides the opportunity to demonstrate our current achievements and establish an implementation framework and future priority initiatives. Objectives identified within the Plan are both long term and short-term; many are ongoing actions or could require implementation over several years. The plan is available on the intranet and external website, and will be provided in an accessible format, upon request. Regular monitoring is necessary to ensure that initiatives are included in the Plan and that progress is identified. The Multi-Year Accessibility Plan's progress will be reviewed and reported every 3 years and a comprehensive review will be conducted every five years (2024).

3. Accessible Emergency Information and Workplace Emergency Response

SmartCentres is committed to providing our customers and our Associates with publicly available emergency information in accessible formats upon request.

Upon request, Human Resources and Corporate Services will work together with the Associates to develop an individualized emergency response information/plan that will meet their needs in an emergency situation.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Employment Initiatives- Emergency Procedures	<p>Individualized workplace emergency response information will be provided upon request in an accessible format when the need is communicated. The individualized workplace emergency response information will be reviewed when:</p> <ul style="list-style-type: none"> • the Associate moves to a different location within the Company; • the Associate's overall accommodation needs or plans are reviewed; • SmartCentres reviews general emergency response policies. 	Human Resources, Corporate Services	Dec 2011	Jan 2012
Employment Initiatives- Emergency Procedures	Create a standard template document to be used to develop individual workplace emergency response plans taking into consideration individual accommodation needs.	Human Resources, Corporate Services	Jan 2014	May 2014

4. Training

SmartCentres will provide training to all Ontario Associates on the Ontario's accessibility laws and on the Human Rights Code as it relates to persons with disabilities. Training will be tailored to Associate's responsibilities and duties and it will be provided in a format that best suits the Associate. The training will also be provided to every Ontario Associate who participates in developing SmartCentres' policies.

SmartCentres has taken the following steps to ensure Associates are provided with the training needed to meet Ontario's accessible laws since August 2011.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Training Initiatives	Develop Accessibility Standards for Customer Service Policy and training in various formats for all Ontario Associates.	Human Resources	Sep 2011	Training completed for current Associates.
Training Initiatives	Continue to conduct, access and review accessible customer service training for all Ontario Associates.	Human Resources	Aug 2011	Completed research in Sep 2012. Ongoing
Training Initiatives	Conduct and review Human Rights Code and the Accessibility for Ontarians with Disabilities Act training for all Ontario Associates. Updated the Quiz in July 2016	Human Resources	November 2014	Training completed for current Associates.
Training Initiatives	Provide training to all new Ontario Associates within 6 months of hire.	Human Resources	Aug 2011	Ongoing
Training Initiatives	Provide periodic training in connection with changes to this Multi-Year Plan and its related practices and procedures.	Human Resources	May 2014	Ongoing
Training Initiatives	Research and provide training for Ontario's accessibility laws and Human Rights Code training in multiple formats.	Human Resources	Jan 2014	Ongoing

5. Kiosks

SmartCentres is committed to incorporating accessibility features when designing, procuring or acquiring self-service kiosks.

6. Information and Communications

SmartCentres is committed to meeting the communication needs of persons with disabilities. We will consult with persons with disabilities to determine their information and communication needs and accommodate where possible. SmartCentres has taken the following steps to ensure that all publicly available information in Ontario is made accessible upon request since January 2013.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Information & Communication Initiatives	AODA statement of commitment sign has been posted at the front reception of SmartCentres' Home Office. AODA- Customer Service Policy is made available in large font at Reception.	Human Resources	Dec 2012	Jan 2013
Information & Communication Initiatives	Provide all tenants with a letter advising them of their responsibilities under the AODA- Customer Service Standard. This letter is included in the tenant welcome kit.	Operations Property Management	Mar 2012	Apr 2012 and ongoing
Information & Communication Initiatives	Continued implementation of a communication campaign to increase awareness of accessibility issues and to inform Associates about issues related to persons with disabilities. Ongoing ideas to be implemented such as intranet information, information in Town Halls.	Human Resources Marketing	June 2012	Ongoing
Information & Communication Initiatives	Provide information and communications in accessible formats and with communication supports to people with disabilities upon request. This will be provided in a timely manner and at a cost that is no more than the regular cost charged to other people.	Human Resources Marketing	Sep 2015	Ongoing

7. Accessible Websites and Web Content

SmartCentres will take the following steps to make our websites and content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA Standards, by January 1, 2021.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Information & Communication Initiatives	External website to be compliant with WCAG 2.0 Level A Standards.	IT, Marketing, Human Resources	Nov 2013	Aug 2016 Ongoing monitoring
Information & Communication Initiatives	Prepare a list of vendors who have the necessary tools to convert our material into accessible formats in a timely manner.	IT, Marketing, Human Resources	Jan 2015	Aug 2019
Information & Communication Initiatives	Establish budget to hire outside consultants to assist in meeting the new standard if we are unable to do so internally.	IT, Marketing, Human Resources	Jan 2020	Aug 2019
Information & Communication Initiatives	Work closely with internal Information Technology and Marketing teams to ensure full understanding and compliance with WCAG 2.0 Level AA Standards.	IT, Marketing, Human Resources	Jan 2020	Jun 2020 for mall websites Q2 2021 for corporate website

8. Feedback Process

SmartCentres has taken the following steps to ensure that our existing feedback process is accessible to persons with disabilities upon request since June 2012.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Feedback Mechanisms	Review & continue use of accessible and alternative feedback methods for general and accessibility related feedback.	Human Resources	Nov 2011	June 2012 and ongoing
Feedback Process	Monitor current feedback mechanisms and review opportunities to increase feedback & engagement with persons with disabilities.	Human Resources	Jun 2012	Ongoing
Feedback Process	Continue responding in a timely manner to all accessibility related feedback and/or concerns.	Human Resources	Jun 2012	Ongoing
Feedback Process	Respond to accessibility related feedback and/or concerns in requested format.	Human Resources	Jun 2012	Ongoing

9. Employment

SmartCentres is committed to fair and accessible employment practices.

Since January 2014, SmartCentres has taken the following steps to notify the public and our Associates that we will accommodate people with disabilities during the recruitment and assessment process and when candidates are hired.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Employment Initiatives-	Post accessibility policies on our website addressing our commitment to accommodate people with disabilities.	Human Resources	Jan 2015	Jan 2014
Employment Initiatives	Review and revise policy and work processes for recruitment, screening & selection process, to provide accommodations.	Human Resources	Jan 2015	Jan 2016
Employment Initiatives	Include a statement on our job posting that persons with disabilities will be accommodated throughout the recruitment and selection process and for the duration of their employment with SmartCentres.	Human Resources	Jan 2015	Jan 2016 and ongoing
Employment Initiatives	Successful candidates will be notified of our policies for accommodating employees with disability when the offer of employment is made.	Human Resources	Jan 2016	Aug 2016 and ongoing

10. Individual Associate Accommodation Plan and Return to Work Policy

SmartCentres has established and implemented a Return to Work Policy and Procedure for developing individual accommodation plans for Associates that have been absent due to a disability.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Employment Initiatives Disability Management	Review and revise Return to Work policy and process with related applicable accommodations in place.	Human Resources	Jan 2012	Oct 2016
Employment Initiatives Disability Management	Develop a standard template for the development of Individual Accommodation Plan and Return to Work Plan.	Human Resources	Jan 2015	Oct 2016
Employment Initiatives Disability Management	Develop training for HR staff on the changes to the policy and process.	Human Resources	Jan 2012	Oct 2016 and ongoing
Employment Initiatives Disability Management	Communicate Return to Work Policy and procedure to Associates on an as needed basis.	Human Resources	Jun 2014	Ongoing

11. Performance Management, Career Development and Redeployment

Since April 2016, we have taken the following steps to ensure the accessibility needs of our Associates with disabilities are taken into account for our performance management, career development and redeployment processes.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Employment Initiatives Performance Management	Review and revise if necessary performance management (PDR), career development (ICD), & Associate redeployment policies. Added an accommodation statement to the Growth and Development section of the Associate Handbook.	Human Resources, Executive Team	Jan 2015	Oct 2016
Employment Initiatives Performance Management	Develop target training for HR staff, on the changes to the policies and process.	Human Resources	Jan 2015	Apr 2016 and ongoing
Employment Initiatives Performance Management	Create an individual accommodation plan in consultation with the Associate with disability. This plan will include consideration for performance management, career development and redeployment processes.	Human Resources	Jan 2015	Oct 2016 and ongoing
Employment Initiatives Performance Management	Communicate revised policies to all Associates.	Human Resources	Jan 2015	Jan 2017 and ongoing

12. Other Accessibility Barriers

SmartCentres has taken the following steps to prevent and remove other accessibility barriers identified.

Project Title	Description	Department Responsibility	Start Date	Completion Date
Other Accessibility Barriers	Continue to remove attitudinal barriers based on continued education & promotion of inclusive work environment.	Human Resources	Sep 2011	Dec 2012 Ongoing
Other Accessibility Barriers	Address any instances where a barrier might exist and determine a course of action to remove the barrier in a timely manner.	Human Resources	Sep 2011	Sep 2012 Ongoing

13. Design of Public Spaces

Since January 2017, SmartCentres has met the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces in Ontario. Public spaces including:

- Trails and beach routes
- Service counters and waiting areas
- Outdoor eating areas
- Outdoor play spaces
- Outdoor paths
- Off-street parking
- Maintaining areas of accessible parts of our public spaces
- Accessibility in buildings
- Any other space that the SmartCentres deems necessary

SmartCentres has implemented procedures in place to prevent service disruptions to its accessible parts of its public spaces.

In the event of a service disruption to the accessible parts of public spaces, we will notify the public of the service disruption and alternatives available.

14. Feedback Process and Request for Information

Any individual who requires additional information regarding SmartCentres' Accessibility Policies and/or our Multi-Year Accessibility Plan can do so in person, by e-mail, or in writing or by any other means, as required. Accessible formats of our Accessibility Policies and our Multi-Year Accessibility Plan will be made available free upon request. SmartCentres commits to responding to all requests for information in a timely manner.

Please direct any Accessibility related enquiries to:

Fernando C. Vescio, SVP, Human Resources and Corporate Services
3200 Highway 7
Vaughan, Ontario, L4K 5Z5

Email: fvescio@smartcentres.com
Phone: 905-326-6400 x 7211
Fax: 905-760-6207

15. Definitions

Associate: employees of SmartCentres

Customer: a member of the public

Disability: defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to the following:

- 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 other remedial appliance or device;
- A learning disability, or dysfunction in one of 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.

Accessibility Policies and Multi-Year Accessibility Plan Revision History

Revision #	Section	Header	Summary of Changes	Date of Change	Originator	Approved by
A			Initial Release	Sep 2014	Kateryna Jones	Shelley Phillippe
B	Page 1-14		Inserted SmartREIT Name, Logo and Contact Number	Jun 2015	Michelle Verbruggen	Shelley Phillippe
B	Page 5	Training	Updated Training Initiative Dates	Jun 2015	Michelle Verbruggen	Shelley Phillippe
C	Page 9	Employment	Updated Dates	Jan 2016	Michelle Verbruggen	Shelley Phillippe
D	Page 5	Training	Added Human Rights and AODA training initiative	Oct 2016	Kateryna Jones	Shelley Phillippe
D	Page 6	Information and Communications	Changed completion date to "Ongoing"	Oct 2016	Kateryna Jones	Shelley Phillippe
D	Page 7	Accessible Websites and Web Content	Updated completion date for our compliance with WCAG 2.0 Level A Standard	Oct 2016	Kateryna Jones	Shelley Phillippe
D	Page 9	Employment	Updated completion date and removed the word "verbal" from the notification of our accommodation policies for successful candidates description	Oct 2016	Kateryna Jones	Shelley Phillippe
D	Page 10	Individual Associate Accommodation Plan and Return to Work Policy	Updated completion dates and added a Return to Work Plan to the development of templates description	Oct 2016	Kateryna Jones	Shelley Phillippe
D	Page 11	Performance Management, Career Development and Redeployment	Updated completion dates and added to the description that an accommodation statement is now included in the Associate Handbook	Oct 2016	Kateryna Jones	Shelley Phillippe
D	Multiple		Changed company name from SmartREIT to SmartCentres	Oct 2017	Kateryna Jones	Shelley Phillippe
E	Multiple		Completed a comprehensive review of the policy as per the 5-year review plan	Oct 2019	Kateryna Jones	Shelley Phillippe
E	Page 6	Kiosks	Added a compliance statement as SmartCentres now owns	Oct 2019	Kateryna Jones	Shelley Phillippe

			self-service kiosks			
E	Page 13	Feedback Process	Updated Home Office address	Oct 2019	Kateryna Jones	Shelley Phillippe
F	Page 1	Cover page	Updated company logo and added the revision date	Dec 2020	Kateryna Jones	Shelley Phillippe
F	Page 7	Accessible Websites and Web Content	Updated completion date for compliance with WCAG 2.0 Level AA Standard	Dec 2020	Kateryna Jones	Shelley Phillippe
F	Page 12	Design of Public Spaces	Added to the list of public spaces	Dec 2020	Kateryna Jones	Shelley Phillippe