



SMARTCENTRES[®]
REAL ESTATE INVESTMENT TRUST

“Where Forward People thinking foster Growth and Success”

Accessibility Policy and Multi-Year Accessibility Plan

Updated December 2025

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Accessibility Policy and Multi-Year Accessibility Plan

The following policy and plan has been established by SmartCentres' to comply with the standards set forth in Regulation 191/11, "Integrated Accessibility Standards" (IASR under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA)).

Statement of Commitment

SmartCentres is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's Accessibility laws. SmartCentres is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. SmartCentres understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not constitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

SmartCentres is committed to excellence in serving and providing goods, services and facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

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).

Training

SmartCentres is committed to training all Ontario Associates in accessible customer service, other Ontario's Accessibility Standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities. Training will be provided in a way that best suits the duties of Associates. SmartCentres will take the necessary steps to ensure all Associates in Ontario are provided with training as soon as practicable, to meet Ontario's accessibility laws. New Associates will be trained as part of the New Hire On-Boarding process. Training will include the following:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Services Standards;
- SmartCentres policies related to Customer Service Standards;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or facilities to people with disabilities
- What to do if a person with a disability is having difficulty in accessing SmartCentres' facilities.

We will maintain training records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Personal Assistive Devices

Individuals with a disability may use their own assistive devices as required when accessing our facilities and/or services. If there is a physical, technological, or other type of barrier that hinders or prevents the use of an assistive device on our premises, we will first try to remove the identified barrier. However, if we are not able to remove the barrier, we will ask the impacted individual how he/she can be accommodated, and we will endeavour to accommodate the individual to a reasonable extent.

Use of Service Animals and Support Persons

Service Animals

Any person with a disability may enter Trust-owned premises, which are open to the public and other third parties, accompanied by a service animal. The individual may keep the animal with them as long as they do not hinder or prohibit the public from accessing such premises and/or the law does not otherwise exclude the animal. While visiting our premises, it is the responsibility of the person with a service animal to control and maintain care of the animal at all times.

In the event that a service animal poses a danger to itself or others, we will make all reasonable efforts to meet the needs of all individuals.

Service Animal(s): an animal specially trained to assist a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
 - College of Audiologists and Speech-Language Pathologists of Ontario;
 - College of Chiropractors of Ontario;
 - College of Nurses of Ontario;
 - College of Occupational Therapists of Ontario;
 - College of Optometrists of Ontario;
 - College of Physicians and Surgeons of Ontario;

- College of Physiotherapists of Ontario;
- College of Psychologists of Ontario; or
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services, or facilities:

- Explain why the animal is excluded;
- Discuss with the customer another way of providing goods, services or facilities.

Support Person

Any person with a disability who is accompanied by a support person will be allowed to enter Trust-owned premises, which are open to the public and other third parties, with his/her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his/her support person while on our premises.

At times, we may require a person with a disability to be accompanied by a support person while on our premises in order to ensure the health and safety of all individuals located on the premises. The support person, if provided by the Trust, will be provided at no cost.

The Trust will obtain consent from the person with a disability should we need to disclose confidential or private information pertaining to the person with a disability in the presence of a support person.

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.

Accessible Website and Web Content

SmartCentres will take the necessary steps to make any new websites and web content on those sites, that we directly or indirectly control through a contractual relationship, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA Standards by January 1, 2021.

Kiosks

SmartCentres is committed to incorporating accessibility features and consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

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. We can arrange for accessible feedback and alternate formats upon request. 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:

Shelley Phillippe, Senior Director Human Resources
3200 Highway 7
Vaughan, Ontario, L4K 5Z5

Email: sphillippe@smartcentres.com
Phone: 647-697-9616
Fax: 905-760-6207

Employment

SmartCentres is committed to fair and accessible employment practices and will take steps to notify applicants and Associates that accommodations are available upon request, to people with disabilities during the recruitment, selection and assessment process and for the duration of employment with SmartCentres.

SmartCentres will implement and put in place a process for developing individual accommodation plans and return to work policies for Associates in Ontario that have been absent due to a disability.

Steps will be taken by January 1, 2016, to ensure the accessibility needs of employees with disabilities are taken into account during performance management, career development and redeployment processes:

Upon request, Associates with disabilities will have an individual accommodation plan developed by Human Resources in consultation with the Associate. The plan will include consideration for performance management, career development and redevelopment processes.

SmartCentres has established and implemented a Return-to-Work Policy and Procedure for developing individual accommodation plans for Associates that have been absent from work due to a disability and require disability-related accommodations in order to return to work.

We will consult with Associates when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the Associate's job; and
- b) information that is generally available to Associates in the workplace

Where needed, we will also provide customized emergency information to help an Associate with a disability during an emergency. With the Associate's consent, we will provide workplace emergency information to a designated person who is providing assistance to that Associate during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the Associate's disability.

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.

2. 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. Ongoing for new 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 2022 | Human Resources | November 2014 | Training completed for current Associates. Ongoing for new 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 |

3. Kiosks

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

4. 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 |

5. 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 SC Website completed Nov 2022 |
| 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 Completed for Corporate Website |

6. 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 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 |

7. 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 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 Ongoing |

8. 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 Ongoing |
| Employment Initiatives Disability Management | Communicate Return to Work Policy and procedure to Associates on an as needed basis. Return to Work Policy in Associate Handbook posted on SmartHub | Human Resources | Jun 2014 | Ongoing |

9. 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 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 Ongoing |
| Employment Initiatives Performance Management | Communicate revised policies to all Associates. Update Associate Handbook with revised policies. Post on SmartHub. | Human Resources | Jan 2015 | Jan 2017 Ongoing |

10. 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 |

11. 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.

12. 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:

Shelley Phillippe, Senior Director Human Resources
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Vaughan, Ontario, L4K 5Z5

Email: sphillippe@smartcentres.com
Phone: 647-697-9616
Fax: 905-760-6207

13. 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.