

Welke Customs Brokers Ltd.

Accessibility Policies & Multi-Year Accessibility Plan

ACCESSIBILITY POLICY

September 22, 2023

1.0 – PURPOSE

Welke Customs Brokers Ltd. (“Welke” or “Company”) is committed to giving persons with disabilities the same opportunity to access and benefit from the products, services, and facilities it offers and to do so in a way that respects the dignity and independence of persons with disabilities.

The purpose of this policy is to set out Welke’s commitment to supporting the standards introduced by applicable accessibility and human rights legislation, and the Company’s commitment to identifying, preventing, and eliminating barriers experienced by all persons with disabilities and ensuring all customers and employees are provided with equal opportunities.

1.1 DEFINITIONS

“Access” – barrier-free access to places, events, and other functions.

“Accessible formats” – formats usable by persons with disabilities which may include, but are not limited to, large print, recorded audio and electronic formats, and braille.

“Accessible communication” – communication of information in a manner that is free from barriers that prevent or hinder a person from obtaining, using, or benefiting from the information.

“Assistive device” – aids and devices used to replace, compensate for, or improve the functional abilities of persons with disabilities. They include a broad range of items such as mobility assistive devices, mobility aids and visual/hearing aids, orthotics/prosthetics, speech devices, medical supplies, environmental controls, and respiratory devices. **“Accommodation”** – removal of barriers to give persons with disabilities an equal opportunity to access our products, facilities, and benefit from our services, based on that person’s disability related needs.

“Barrier” – means anything that prevents a person with a disability fully participating in society due to the disability.

“Built environment” – buildings, structures, and premises (includes facilities)

“Communication” – means the interaction between two or more persons where information is provided, sent, or received.

“Communication supports” – include captioning, alternative and enhanceive communication supports, plain language, and other supports to enable effective communications.

“Disability” – means any degree of physical, mental, emotional, developmental, or learning impairment, and includes temporary and permanent disabilities, visible and invisible disabilities (e.g., visual, hearing, or mental impairment, or learning or developmental disabilities).

“Facilities” – buildings, equipment, or services provided for a particular purpose.

“Information” – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

“Mobility aid” – means a device used to facilitate the transport, in a seated posture, of a person with a disability.

“Mobility assistive device” – means a cane, walker, or similar aid.

“Service Animal” – an animal that provides assistance to a person with a disability that relates to that person's disability, and it:

- can be easily identified as an animal being used by the person for reasons relating to the person's disability; or
- the person using a service animal can provide documentation from a regulated health professional confirming the animal is required due to disability.

“Support person” – A person who accompanies a person disabled by a barrier to:

- support the person obtaining using or benefiting from a good or service; or
- assist the person in addressing the person's communication, mobility, personal care, or medical needs.

2.0 WELKE'S COMMITMENT TO ACCESSIBILITY

Welke is committed to creating an inclusive environment with equal access and participation for persons with disabilities. In alignment with values of Family, Teamwork and Respect for all People, Welke is committed to removing barriers for persons with disabilities and treating persons with disabilities in a way that allows them to maintain their dignity and independence.

Welke continues to build upon and improve its practices by removing and preventing barriers to accessibility in order to meet the needs of persons with disabilities in a timely manner, consistent with the specific requirements of applicable accessibility and human rights legislation.

Welke reviews, updates, and implements accessibility standards in its practices and policies. This policy, related policies and Welke's Multi-Year Accessibility Plan outline the Company's strategies to prevent and remove barriers to accessibility from the workplace and to meet the requirements under applicable accessibility legislation. The Multi-Year Accessibility Plan will be reviewed and updated at least once every five (5) years and be posted on Welke's website. Upon request, Welke will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

3.0 GENERAL REQUIREMENTS

3.1 Training Associates and Volunteers

Welke will ensure that accessibility training is provided in accordance with the requirements of the accessibility standards in applicable accessibility legislation and will continue to ensure human rights training as it pertains to persons with disabilities is provided to:

- All associates and volunteers;
- All persons who participate in developing Welke's policies; and,
- All other persons or third parties who provide products, services, or facilities on behalf of Welke.

Training will be provided as soon as reasonably practicable and ongoing training will be provided in connection with any changes to Welke's accessibility policies.

4.0 INFORMATION AND COMMUNICATIONS STANDARDS

4.1 Accessible Communication

Welke trains all team members in accessible communication. On request, Welke will provide information through communication support or accessible format.

4.2 Feedback, Accessible Formats and Communication Supports

Welke will ensure that its process for receiving and responding to feedback respects the accessible communication needs of persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. This will be done in a timely manner that considers the person's accessibility needs due to disability. Welke will consult with the person making the request in determining the suitability of an accessible format or communication support.

4.3 Emergency Information

When Welke prepares and updates emergency procedures, plans or public safety information and makes the information available to the public, the information will be

available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

4.4 Accessible Websites, Web Applications and Web Content

Welke is committed to making its website and web content available in a format that conforms with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) Level AA (as applicable), with limited exceptions in line with established accessibility information and communication standards.

5.0 EMPLOYMENT STANDARDS

5.1 Recruitment, Assessment or Selection Process

Welke will notify its team members and the public about the availability of reasonable accommodation for applicants with disabilities in its recruitment process. When job applicants are selected to advance in the recruitment process, they will be notified that reasonable accommodations are available upon request in relation to the activities, materials, or processes to be used. If a selected applicant requests accommodation, Welke will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that considers the applicant's specific accessibility needs. When making offers of employment, Welke will notify the successful applicant of its policies and practices for accommodating team members with disabilities.

5.2 Supports for Team Members

All team members will be informed of where to find the Company's policies (and any updates to those policies) used to support team members with disabilities. For new team members, this information will be provided as soon as possible after commencing employment. Upon the request of a team members with accessible communication needs, Welke will work with the team member to determine appropriate communication supports for information that is needed by the team member to perform their job and receive information that is generally available to other team members. When conducting performance management, providing career development and advancement, or when redeploying team members, Welke will continue to consider the specific accessibility needs of team members with disabilities, as well as any individual accommodation plans.

5.3 Workplace Emergency Response Information

Welke will provide individualized workplace emergency response information to team members who have a disability where the Company is aware that individualized information is necessary. Welke will provide this information as soon as practicable after becoming aware of the need for accommodation. Where the team member requires assistance, Welke

will, with the consent of the team member, provide this information to the person designated by the Company to provide assistance to the team member. The individualized workplace emergency response information will be reviewed when the team members move to a different location, when the team member's overall accommodations needs or plans are reviewed, and, when Welke reviews its general emergency response policies.

5.4 Return to Work Process

Welke will maintain a documented return to work process for team members who have been absent from work due to a disability and who require disability-related accommodation in order to return to work. The return-to-work process will outline the steps Welke will take to facilitate the team member's return to work and use documented individual accommodation plans as part of the process. This return-to-work process will not replace or override any other return-to-work process created by or under any other statute.

6.0 BUILT ENVIRONMENT AND DESIGN OF PUBLIC SPACES STANDARD

When building or making major modifications to the built environment, including public spaces such as exterior paths of travel, accessible parking and/or obtaining service, Welke will meet the accessibility standards set out under all applicable legislation.

7.0 REVIEW PERIOD

This policy shall be reviewed every 5 (five) years and will be revised in light of any legislative or organizational changes.

8.0 FEEDBACK PROCEDURE

Welke welcomes feedback on how the Company provides products, services, or facilities to people with disabilities. Feedback can be provided in the following way(s):

- In person at The Company's Location
- By telephone to Customer Care 416-674-0529
- By email to Accessibility@welke.com

The person providing feedback can expect a response within five (5) business days of the feedback being received, where possible. Welke will make sure its feedback process is accessible, taking into account the individualized accessible communication needs of the person providing feedback. Information will be made available, upon request, in an accessible format or using suitable communication support.

MULTI-YEAR ACCESSIBILITY PLAN

September 22, 2023

INTRODUCTION

Welke Customs Brokers Ltd. (“Welke” or “Company”) is committed to giving persons with disabilities the same opportunity to access and benefit from the products and services it offers all customers and team members and access to its facilities and doing so in a way that respects the dignity and independence of persons with disabilities.

This Multi-Year Accessibility Plan outlines Welke’s strategies to prevent and remove barriers to accessibility from the workplace, to address the current and future requirements set out in provincial accessibility-related laws, including the Integrated Accessibility Standards Regulation (“IASR” or the “Regulation”) under the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) and relevant Regulations under The Accessibility for Manitobans Act (“AMA”), and provincial human rights laws and to fulfill the Company’s commitment as outlined in the Company’s Accessibility Policy.

This Multi-Year Accessibility Plan will be reviewed and updated at least once every 5 (five) years and is posted on Welke’s Canadian website at www.welke.com. Upon request, Welke will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

GENERAL

1.0 TRAINING

Action: Accessibility training is provided to all team members, volunteers, persons who participate in developing the Company’s policies, and all persons who provide products, services, or facilities on behalf of Welke. Our training incorporates Welke’s accessibility policies, accessibility standards and responsibilities under provincial human rights laws that pertain to persons with disabilities. Training will be provided as soon as reasonably practicable and ongoing training will be provided in connection with any changes to Welke’s accessibility policies. Welke maintains a training record including training dates and the number of attendees.

3.0 INFORMATION AND COMMUNICATIONS

3.1 Accessible Communication: Feedback, Accessible Formats, Communication Supports and Emergency Information

Action: Welke ensures that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request. When accessible formats and communication supports for persons with disabilities are requested, Welke:

- Consults with the person making the request to determine the suitability of the accessible format or communication support;
- Provides or arranges for information to be communicated in an accessible format that meets the individual's accessible communication needs; and
- Ensures information requested in accessible formats are made available in a timely manner.

Emergency procedures, plans or public safety information will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

3.2 Accessible Websites, Web Applications and Web Content

Action: Welke's internet website and web content will conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 standards at Level AA, subject to limited exceptions that align with accessibility information and communication standards

Implementation Timeframe: By September 22, 2023, and ongoing.

4.0 EMPLOYMENT

4.1 Recruitment, Assessment or Selection Process

Action: Welke has implemented measures to ensure job applicants, team members and the public are notified about the availability of reasonable accommodations including the following:

- Provide notice about available reasonable accommodations in internal and external communications relating to recruitment and to job applicants when they are selected to participate in an assessment or selection process.
- Consult with applicants about identified accommodation needs and offer suitable accommodation.
- Include reference to the availability of accommodation under Welke's accommodation policies and practices in all offers of employment.
- Review existing accommodation policies and make any necessary changes. Inform team members of relevant policies used to support them with disabilities and any

policy changes and provide this information to new team members as practicable after commencing employment.

4.2 Workplace Emergency Response Information

Action: Welke has implemented the following measures to provide workplace emergency response information to team members:

- Review existing workplace emergency procedures and update them, if necessary.
- Advise team members to provide notice of any accommodation needs with respect to workplace emergencies.
- Prepare and provide team members needing accommodation with individualized workplace emergency response information if appropriate and in consultation with the affected team member.
- Keep a confidential record of individualized workplace emergency response information requests and responses.
- Designate individuals to assist team members needing accommodation during workplace emergencies and, with the consent of the affected team member, provide the individualized workplace emergency response information to the designated individual.

Implementation Timeframe: By September 22, 2023, and ongoing to reflect Welke's Emergency Preparedness and Response Standard.

4.3 Individual Accommodation Plans and Return to Work Process

Action: Welke has an accommodation process that respects the principles of dignity, inclusion, and individualization. Welke will explore accommodation options to remove barriers once it has been made aware of a team member or prospective team member who requires accommodation based on a protected ground under applicable human rights legislation and accessibility legislation and includes the following elements:

- How a team member requesting accommodation can participate in the development of an individual accommodation plan and how the Company assesses team members on an individual basis.
- The steps taken to protect the privacy of the team member's personal information with respect to accommodation.
- The means of providing the individual accommodation plan in a format that considers the team member's accessibility needs due to disability.
- Individual accommodation plans will include relevant information regarding team member formats and communications supports to be provided (if requested), individualized workplace emergency response information (if required) and identify any other accommodation that is to be provided.

Further, Welke's Return to Work process is where Welke will prepare an individual accommodation plan for team members who have been absent from work due to disability and who require disability-related accommodations to return to work. Information provided in support of an accommodation request will be treated confidentially and will be shared only as needed for the accommodation process. This includes maintaining a documented return to work process that outlines the steps the Company will take to facilitate the return to work and includes documented individual accommodation plans as part of the process.

Implementation Timeframe: By September 22, 2023, and ongoing.

4.4 Performance Management, Career Development and Advancement, and Redeployment

Action: Welke will continue to ensure that managers are aware of their responsibility to consider the accessibility needs of team members with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to team members, or when engaging in team member redeployment.

Implementation Timeframe: By September 22, 2023, and ongoing.

5.0 DESIGN OF PUBLIC SPACES STANDARD

Welke continues to comply with accessibility standards and requirements under applicable laws when building, replacing, or making major modifications to the Company's built environment or the design of its public spaces which includes exterior paths of travel, accessible parking, service counters, queue guides and waiting areas as described below.

5.1 Exterior Paths of Travel and Accessible Parking

When newly constructing or redeveloping sidewalks or walkways (including associated ramps, stairs, curb ramps, depressed curbs, pedestrian control signals and rest areas) and any new or redeveloped off-street parking (including accessible parking spaces, access aisles and signage).

5.2 Obtaining Services (Service Counters, Queue Guides and Waiting Areas)

- When newly constructing or redeveloping waiting areas, where seating is fixed to the floor, there will be at least one accessible seating space where an individual using a mobility aid can wait.

6.0 CUSTOMER SERVICE STANDARD

Action: Accessible customer service training is provided to Welke’s team members, volunteers, and others who participate in developing the Company’s policies or provide products, services, or facilities on behalf of Welke. Welke’s training incorporates: the purpose of accessibility-related legislation including the AODA, and the related regulations, Welke’s policies, practices and procedures related to accessible Customer Service, how to effectively interact and communicate with people with various types of disabilities (including people who use an Assistive Device or require the assistance of a Service Animal or a Support Person), and what to do if a person with a disability is having difficulty in accessing Welke’s products, services or facilities.

6.1 Providing Products and Services to People with Disabilities

- Welke welcomes people with disabilities and their Service Animals on the parts of the Company’s premises that are open to the public, unless otherwise prohibited by law.
- People with disabilities may use their personal Assistive Devices when accessing the Welke’s products, services, or facilities.
- People with disabilities who are accompanied by a Support Person are welcome to have that person accompany them on Welke’s premises.

7.0 FEEDBACK PROCEDURE

Welke welcomes feedback on how the Company provides products or services to people with disabilities. Feedback can be provided in the following way(s):

- By telephone to Customer Care team at 416-674-0592
- In writing to: Welke Accessibility – 116 Skyway Avenue, Toronto, ON, M9W 4Y9
- By email to accessibility@welke.com

The person providing feedback can expect a response within five (5) business days of the feedback being received, where possible. Welke will make sure its feedback process is accessible, considering the individualized accessible communication needs of the person providing feedback. Information will be made available, upon request, in an accessible format or using suitable communication support.

8.0 CONTACT

For general inquiries or to make a request for an alternate format of this Multi-Year Accessibility Plan, please contact: accessibility@welke.com