

Accessible Employment Standard

February 2024

INTRODUCTION:

Reitmans (Canada) Limited is committed to a diverse and inclusive workplace for all. We recognize that our future success depends on the perspectives and contributions of all our employees -- their diverse backgrounds, abilities and experiences make our business stronger.

We are committed to complying with **The Accessible Employment Standard Regulation**, under **The Accessibility for Manitobans Act**. Our policies, practices and measures reflect principles of dignity, independence, integration, and equal opportunity for people with disabilities.

We aim to remove barriers in our workplace. If a barrier cannot be removed, we seek to provide reasonable accommodations to affected employees.

The following policy statements, organizational practices and measures are intended to meet the requirements of Manitoba's Accessibility Standard for Employment.

PRE-EMPLOYMENT ACCESSIBILITY REQUIREMENTS

1. Remove barriers to recruitment and selection

Policy Statement:

Reitmans (Canada) Limited utilizes internal personnel for recruitment purposes. Positions being filled will be posted on the company website. The availability of accommodation(s) for applicants in the recruitment process is posted on the Careers page of the company website. During recruitment, we inform all potential applicants that reasonable accommodations are available during the selection process, and we respond in a timely manner to requests for accommodations.

Practices and Measures:

- We include a statement on all job postings that reasonable accommodations are available to applicants with disabilities, and we seek their advice on how best to accommodate their needs.
- The company is committed to accessibility, both in our stores and online. Both our eCommerce websites and our corporate website are compliant with Web Content Accessibility Guideline (WCAG) 2.0 Level AA.
- When making interview arrangements, we inform applicants that reasonable accommodations are available during the assessment and selection processes.

When an applicant has placed a request for an accommodation during the selection process, we will take reasonable steps wherever possible to:

- Consult with the applicant to determine the appropriate accommodation; and
- Put the appropriate accommodation in place during the assessment or selection process.

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2. Mention workplace accommodations when offering employment

Policy Statement:

When hiring, we are open to questions from selected applicants concerning our measures, policies and practices for accommodating employees with disabilities.

Practices and Measures:

- The Company will notify applicants when they are called for an interview about the availability of recruitment-related accommodations during the selection process.
- We include information about workplace accommodations and accessible employment policies and practices in our letter of offer to all selected applicants.
- We include information about workplace accommodations and accessible employment, policies and practices in our new employee orientation materials.

EMPLOYMENT ACCESSIBILITY REQUIREMENTS

3. Inform employees about accommodation policies and practices

Policy Statement:

We inform our employees that we have instituted accommodation measures, policies and practices for employees with disabilities.

Practices and Measures:

We provide information to employees about our policies for employees with disabilities and any updates in multiple ways, such as:

- Posted on an internal site or through staff correspondence;
- Posted in the staff room or in high traffic areas;
- Through discussions with management (in person, by phone or through email);
- Through the company's internal support line made available for free to all employees.

The Company will, upon request, consult with an employee with a disability to determine which accessible formats or communications supports they require to perform the duties of their job. An individualized accommodation plan will be completed and the accessible formats and/or communication supports that will be provided to the employee will be noted in the plan. The Company's policies will be modified to include reference to the availability of accommodations for employees with disabilities.

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4. Communicate in a way that meets employees' needs

Policy Statements:

We aim to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone.

The Company will, either upon request or when an accommodation concern is brought to our attention, consult with an employee with a disability to determine which accessible formats or communications support they require to perform the duties of their job. An individual accommodation plan will be completed and the accessible formats and/or communication supports that will be provided to the employee will be noted in the plan. The Company's policies will be modified to include reference to the availability of accommodations for employees with disabilities.

If requested by an employee with a temporary or permanent disability, we:

- Consult with the employee to identify the accessible formats, or communication supports needed when providing information to the employee;
- Ensure that identified accessible formats or communication supports are continually used when providing information to the employee.

Practices and Measures:

- To meet an employee's communication needs, either upon request or when an accommodation concern is brought to our attention, we ask the employee what accessible format or communication support is most appropriate for them.
- We provide information to employees in multiple ways to meet everyone's needs, including posting information on our notice board in the staff room and speaking with employees who may be disabled by barriers.

5. Provide individualized accommodation plans

Policy Statement:

Our policy is to provide reasonable accommodations by developing and documenting individualized accommodation plans for employees with disabilities who request them.

The company will create an individual accommodation plan for any employee for which they have been made aware has a disability. There may be times when the company will initiate a dialogue to offer assistance and accommodation for employees who are clearly unwell or perceived to have a disability. The employee will be included in the development of the plan. The Company may seek outside medical or other expert evaluations to provide appropriate support. The plan will be reviewed when there is a change in the employee's disability or job.

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Practices and Measures:

The individualized accommodation plan includes:

- Information about accessible formats and communication supports, if requested;
- Workplace emergency response information. The company has created an “Individualized Emergency Response Plan Consent Form” to enable employees with a disability to inform the company that they have a disability that requires an accommodation. Once completed, the form may be submitted to the Health & Wellness Department at serh@reitmans.com or by telephone contact at (877) 385-2666 (Ext. 2720);
- Details of how and when any other accommodations will be provided, if applicable;
- When the plan will be reviewed and, if applicable, updated.

Our employees will participate and cooperate in the accommodation process by:

- Providing related information;
- Taking part in assessments, if requested by the employer, at the employer’s expense;
- Following the individualized accommodation plan in good faith; and
- Offering ongoing feedback related to how the modifications are working, asking for additional modifications or that the accommodation is no longer required;

Supervisors, in partnership with human resources, will review the accommodation plan upon request or upon notification during regular employee review. Supervisors, in partnership with human resources, will also review an employee’s individualized accommodation plan, and update the accommodation plan if required, whenever:

- The employee is moved to a different workspace;
- The employee’s workspace is modified;
- The employee’s responsibilities have changed;
- Other workplace changes have occurred that affect the accommodation;
- The employee has made a request to review and update the accommodation plan earlier than outlined in the plan;
- The Company reviews its general emergency response plans and makes changes that would affect the employee’s response to an emergency in the workplace.

A. Request for an individualized accommodation plan

We support employees by providing reasonable accommodations in the workplace. Employees may make a verbal or written request to their manager, supervisor, or other human resources representative for an individualized accommodation plan.

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B. Assessment of employee and accommodation required

We will assess the employee and possible accommodations on an individual basis.

We may request that the employee provide documentation from a health practitioner or other practitioner specializing in workplace accommodation who supports the need for the accommodation. We may request, at the organization's expense, an evaluation by an independent regulated health professional or other practitioner in the area of workplace accommodations for employees with disabilities.

C. Assistance for the employee in developing the accommodation plan

An employee may request that the following individuals assist with developing the plan:

- Another person who is knowledgeable about workplace accommodations for employees with disabilities.

D. Accessible formats

We meet the communication needs of our employees by providing them with a copy of their plan in a format and with any communication support to meet the needs of the employee.

E. Reasons for denying a request

We may deny an employee's request for an individualized accommodation plan if:

- An independent regulated health professional(s) contracted to conduct an assessment does not support the employee's self-assessed requirement for a workplace accommodation.
- Evidence shows that the accommodation request would cause undue hardship (e.g., create a major and measurable cost to the employer or health and safety risks).
- If a request for a reasonable accommodation request is denied, we will provide the employee with the written reason(s) for the denial.

F. Maintaining Privacy

We maintain employee privacy regarding accommodation plans and personal health information by following the practices outlined in Section 10 below.

6. Manage performance

Policy Statements:

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Under the Accessibility Act, the term performance management means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success. The Company will, in its performance management process, consider the accessibility needs of employees with disabilities.

We ensure our performance management process takes into account:

- That an employee may be temporarily or permanently disabled by one or more barriers in the workplace;
- An employee's individualized accommodation plan;
- That the accommodations provided for an employee may not fully address a workplace barrier.

Practices and Measures:

- We meet with staff at least bi-annually to discuss progress, new goals and any challenges.
- We speak with employees when they do not follow company policy or meet expectations, and offer a spoken and written warning of consequences, including disciplinary action.
- We are open to discussing existing workplace accommodations and propose modifications or new workplace accommodations if we believe this could help improve the performance of an employee with a disability.
- Prior to imposing disciplinary measures, conversations are held with employees to determine whether there is a connection between concerns about job performance and workplace barriers.

7. Provide career development, training, internal advancement and reassignment

For employers who provide career development, training or opportunities for internal advancement within the employer's organization.

Policy Statements:

The Company will take into account what accommodations employees with disabilities may need to succeed elsewhere in the organizations or to take on new or different responsibilities in their current position. If the employee has an individual accommodation plan in place, the plan will be updated to reflect the changes in their new or different responsibilities.

Policies will be revised to include a statement that an employee with a disability will not be hindered in their advancement opportunities within the company. All employees will and are considered based on their skill, suitability and experience for the roles within the company.

When providing career development, training or opportunities for internal advancement or reassignment, we ensure the process for recruiting and selecting candidates takes into account:

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- That an employee may be temporarily or permanently disabled by one or more barriers in the workplace;
- An employee's individualized accommodation plan;
- That the workplace accommodation provided for an employee with a disability may not fully address the workplace barrier.

Our practices and measures aim to ensure that workplace accommodations do not negatively affect access to career development.

Practices and Measures:

- We recruit and select candidates based on objective criteria, such as current training, job experience, skills and number of years on the job.
- If a candidate has an individualized accommodation plan, we ensure it is adequate to address any barriers presented by the new opportunity, or we modify the plan accordingly.
- Our training program and methods for career development are accessible to all employees. If a barrier is identified, we attempt to remove or reduce it.

8. Put return-to-work processes in place

Policy Statements:

Our return-to-work policy reflects our commitment to providing a safe and healthy working environment for employees who are, or have been, absent from work due to a disability and require reasonable accommodations to return to work. If necessary, we will take reasonable steps to modify an existing accommodations plan for employees who return to work following an absence.

We include a description of the process we will follow in determining the accommodations necessary to facilitate the return to work of employees who have been absent due to a disability. Our return-to-work policy ensures reasonable accommodations for employees who are at work or absent due to a disability. We will make efforts to modify employees' duties and work schedules based on their functional abilities. Our aim is to increase duties safely to help employees reach their full potential. In the event that the Company engages in a redeployment process or structural changes occur resulting in loss of position, employees requiring accommodation will be given an equal opportunity to apply for other positions.

Practices and Measures:

- The Company provides a return-to-work plan for its employees who have been absent from work due to a disability and require disability-related accommodations in order to

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return to work. The return-to-work process is documented. If an individual's injury is covered by the return-to-work provisions of the Workplace Safety and Insurance Act, then that Act's return to work process would apply.

- We keep in touch with absent employees and the Workers Compensation Board of Manitoba (WCB) (when involved) throughout the employees' recovery to help them maintain a connection with their workplace and to show they are valued.
- We offer meaningful and productive modified or alternate duties that are safe and within the employee's functional abilities.
- We are flexible and tailor the return-to-work plan to the employee's needs.
- We ensure supervisors and co-workers support employees who have been absent due to a disability and participate in the return-to-work process.
- We educate staff on why returning to work is good for business and outline the expectations for supporting an employee in a modified role.
- We follow WCB's return to work process.

We recognize that pandemics, like COVID-19, pose serious health threats to people with pre-existing conditions, and we accommodate affected employees.

9. Provide workplace emergency response information

Policy Statements:

We provide information to employees concerning the steps to be taken during emergencies, to ensure the safety of all employees, including those who are temporarily or permanently disabled. We ensure workplace emergency response information is specific to each employee's needs and the physical nature of the employee's workspace.

Upon request, the company will create an Individualized Workplace Emergency Response Plan for employees who have a disability and require accommodation(s)/support to evacuate their workplace in an emergency. With the employee's consent, the employees in their workplace will be provided with the necessary information to assist the employee with the disability. Once we learn an employee requires assistance during a workplace emergency, we offer the employee individual workplace emergency response information as soon as possible.

Any workplace emergency response information provided to an employee follows the employee wherever they go. Supervisors, in partnership with human resources, will also review an employee's individualized accommodation plan, and update the accommodation plan if required, whenever:

- The employee is moved to a different workspace;
- The employee's workspace is modified;

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- The employee's responsibilities have changed;
- Other workplace changes have occurred that affect the accommodation;
- The employee has requested to review and update the accommodation plan earlier than outlined in the plan;
- The Company reviews its general emergency response plans and makes changes that would affect the employee's response to an emergency in the workplace.

If an employee who receives workplace emergency response information requires the assistance of another person during an emergency, management will ensure that an employee is assisted and will explain how this assistance will be delivered.

Practices and Measures:

- Following legislative changes or as otherwise required, we will discuss general accessibility and identify barriers during Workplace Safety and Health meetings.
- In a situation where an employee who is disabled by barriers requires assistance to exit a building during an evacuation, Company management will consult with the employee to develop suitable individualized emergency response and measures for the employee.

10. Maintain privacy

Policy Statements:

We protect the privacy and confidentiality of employee's personal information and personal health information. We only collect, use, and disclose information as required for the purposes of the Accessibility Standard for Employment, unless otherwise agreed to by the employee.

We also follow the requirements of other privacy legislation, including The Freedom of Information and Protection of Privacy Act (Manitoba) and The Personal Health Information Act (Manitoba).

Practices and Measures:

- We follow proper protocol when storing confidential employee information. The company has a privacy policy that it applies to employees as well as customers. The policy may be found on the websites of the company's three banners (Reitmans, RW&CO. and PENN. Penningtons).
- We always protect our employees' personal information and personal health information by taking the following steps: using confidential forms or locking file storage and limiting access to human resources and managers only.

11. Provide training

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Policy Statements:

We provide training on how to accommodate employees with a disability to staff with the following responsibilities:

- All staff with human resource responsibilities, as soon as practicable
- All staff with human resource responsibilities in connection with changes to Company's measures, policies and practices respecting accessible employment.

For clarity, the list of staff with human resource responsibilities that will provide accommodation training include those who are responsible for or involved in the following Company tasks:

- Recruiting, selecting or training employees;
- Supervising, managing or coordinating the work of employees;
- Promoting, redeploying or terminating employees;
- Developing and implementing employment policies and practices.

The training content used by the company was developed by the Manitoba Government and is referred to "Accessible Employment" (<https://amalearningmb.ca/launch-ae.html>).

Practices and Measures:

- We train management as soon as reasonably possible as part of the onboarding program provided after hiring.
- Training is offered through electronic learning modules that are tracked through the company's learning management system and updated as needed. Employees can access the training on demand.

12. Keep a written record of accessibility and training policies

Policy Statements:

We keep a record of our accessibility and training policies.

Practices and Measures:

- We will let employees know that our accessibility and training policies are available in the following ways:
- Posted on our website and on the company's Intranet.