


<b>MULTI-YEAR ACCESSIBILITY PLAN</b>	
<b>Location(s):</b> Canada	
<b>Date Issued:</b> 04-DEC-2023	<b>Version No:</b> 1

**Statement of Organizational Commitment**

Thornhill Research Inc. (“Thornhill Medical”) is committed to ensuring equal access and participation for people with disabilities and is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

Thornhill Medical has developed a Multi-Year Accessibility Plan which outlines the overall strategies of how Thornhill Medical will meet its obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA” or the “Act”), as well as the Integrated Accessibility Standards Regulation (Regulation 191/11) (the “IASR”). Compliance with legislation and the identification and elimination of barriers to accessibility are on-going concerns and we will continuously review, consult, educate, and interact with others in order to fulfill our commitments.

Thornhill Medical’s Multi-Year Accessibility Plan will be reviewed and updated once every five (5) years.

<b>Initiative</b>	<b>IASR Requirement</b>	<b>Action</b>	<b>Compliance Status</b>
<b>Part 1 – General Requirements</b>			
<b>Establishment of Accessibility Policies</b>	3.(1) Every obligated organization shall develop, implement & maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Thornhill Medical has developed and implemented policies governing how it achieves accessibility and meets its legal requirements.	Compliant
	3.(2) Obligated organizations shall include a Statement of Organizational Commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.	Thornhill Medical has included a Corporate Statement of Organizational Commitment in its policies.	Compliant
	3.(3) Large organizations shall, a) prepare one or more written documents describing its policies and, b) make the documents publicly available and shall provide them in an accessible format upon request.	Thornhill Medical has launched its policies to all employees and posted it on its internal employee shared drive, internal website, external website, employee handbook, and included it in the employee onboarding program as part of employee training.	Compliant

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<p><b>Accessibility Plans</b></p>	<p>4.(1) Large organizations shall,</p> <p>a) establish, implement, maintain &amp; document a multi-year accessibility plan, which outlines the organization’s strategy to prevent &amp; remove barriers and meet its requirements under this Regulation.</p> <p>b) post the accessibility plan on their website and provide the plan in an accessible format upon request; and</p> <p>c) review &amp; update the accessibility plan at least once every five (5) years.</p>	<p>a) Thornhill Medical has established and implemented a multi-year accessibility plan in order to identify and remove barriers and meet its legal requirements.</p> <p>b) Thornhill Medical posted the accessibility plan on its internal employee shared drive, internal website, and external website in an accessible format.</p> <p>c) Thornhill Medical will review and update the accessibility plan next in December 2028 and every 5 years thereafter.</p>	<p>Compliant</p>
<p><b>Self-Service Kiosks</b></p>	<p>6.(1) Without limiting the generality of section 5, organizations shall incorporate accessibility features when designing, procuring, or acquiring self-service kiosks.</p> <p>“kiosk” means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.</p>	<p>Existing point-of-sale devices used for the purchase of Thornhill Medical’s devices are primarily managed through 3<sup>rd</sup> party organizations (i.e., local/ international governments, distributors).</p> <p>Thornhill Medical will consider the needs of people with disabilities when designing, procuring, or acquiring self-service kiosks in the future.</p>	<p>Compliant</p>
<p><b>Training</b></p>	<p>7.(1) Every obligated organization shall ensure that training is provided on the requirements of the Accessibility Standards referred to in the Regulation and on the Human Rights Code as it pertains to persons with disabilities to:</p> <ul style="list-style-type: none"> <li>• All employees, and volunteers.</li> <li>• All persons who participate in developing the organization’s policies.</li> </ul>	<p>All Thornhill Medical employees, contractors, volunteers, persons who participate in developing policies, and those who provide goods and services on behalf of the organization receive training on accessibility standards as it relates to people with disabilities as part of the onboarding process.</p> <p>Training is available in an accessible format as requested.</p>	<p>Compliant</p>

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	<ul style="list-style-type: none"> <li>All other persons who provide goods, services, or facilities on behalf of the organization.</li> </ul> <p>7.(2) the training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers, and other persons.</p> <p>7.(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>7.(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p> <p>7.(5) Every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>Training is appropriate to the individuals' duties.</p> <p>Training records for all employees, contractors, and volunteers is maintained by HR.</p> <p>Training in respect of any changes to the policies described in section 3 will be completed on an ongoing basis.</p> <p>The training record includes the date of training &amp; name of participant(s).</p>	
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Initiative	IASR Requirement	Action	Compliance Status
<b>Part II – Information and Communications Standards</b>			
<b>Feedback</b>	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.	Thornhill Medical has a process for receiving and responding to feedback. If requested, Thornhill Medical will make arrangements so that this process is made available in an accessible format and communications supports.	Compliant
	11.(3) Every obligated organization shall notify the public about the availability	Thornhill Medical notifies the public about the availability of accessible formats and	Compliant

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	of accessible formats and communication supports.	communication supports through its external website.	
<b>Accessible Formats and Communication Supports</b>	12.(1) Except as otherwise provided, every obligated organization shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities:  a) in a timely manner that takes into account the person’s accessibility needs due to disability.  b) at a cost that is no more than the regular cost charges to other persons.	Upon request, Thornhill Medical will provide accessible formats and communication supports for persons with disabilities in a timely manner and at no extra cost.	Compliant
	12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Thornhill Medical consults with persons requesting accessible formats or communication supports in a timely manner.	Compliant
	12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Thornhill Medical’s AODA policy provides this information. This policy is posted on Thornhill Medical’s internal employee shared drive, internal website, and external website. It is also communicated to all applicants during the hiring process.	Compliant
	12.(4) Every obligated organization that is required to provide accessible formats or accessible format supports as outlined above, must do so in a timely manner.	Thornhill Medical consults with persons requesting accessible formats or communication supports in a timely manner.	Compliant
<b>Emergency Procedure, Plans or Public Safety Information</b>	13(1) In addition to its obligations under section 12, if an obligated organization prepares Emergency Procedures, plans, or public safety information and makes the information available to the public, the obligated organization shall provide	This standard is not currently applicable; however, Thornhill Medical will ensure it complies to this regulation as required in the future.	Not Applicable

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	the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.		
<b>Accessible Websites and Web Content</b>	14.(1) All internet and intranet websites and web content must conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA.	Thornhill Medical is in the process of making its website and web content conform to the World Wide Web Consortium Content Accessibility Guidelines (WCAG) 2.0, at level AA.	Will be compliant by the end of January 2024.

<b>Initiative</b>	<b>IASR Requirement</b>	<b>Action</b>	<b>Compliance Status</b>
<b>Part III – Employment Standards</b>			
<b>Recruitment, General</b>	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Thornhill Medical notifies employees and the public about the availability of accommodation for applicants with disabilities by including a statement in all internal and external job postings.	Compliant
<b>Recruitment, Assessment or Selection Process</b>	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	Thornhill Medical notifies job applicants if they are selected to participate in the assessment and selection process, that accommodations are available upon request in relation to the materials or processes used.	Compliant
	23.(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.	Thornhill Medical will consult with applicants and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.	Compliant

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<b>Notice to Successful Applicants</b>	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Thornhill Medical notifies successful applicants regarding its policies for accommodating employees with disabilities when making offers of employment, as well as during the onboarding process.	Compliant
<b>Informing Employees of Supports</b>	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.	Thornhill Medical informs its employees on all policies used to support employees with disabilities through its Employee Handbook and related policies which is also outlined in all employee agreements and is available on the company’s internal employee shared drive and internal website.	Compliant
	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Thornhill Medical provides the information under this section to new employees through the Employee Handbook and related policies which are referenced in their employment agreement. In addition, it is included in the employee onboarding process and related training.	Compliant
	25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.	Upon a change to an existing policy Thornhill Medical will take into account an employee’s accessibility needs and provide updates via email, the internal website/ or employee shared drive, or applicable training.	Compliant
<b>Accessible formats and communication</b>	26.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the	Thornhill Medical supports this requirement on an as needed basis.	Compliant

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<b>n supports for employees</b>	<p>provision of accessible formats and communications supports for:</p> <p>a) information that is needed in order to perform the employee’s job</p> <p>b) information that is generally available to employees in the workplace.</p>		
	<p>26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>Thornhill Medical supports this requirement on an as needed basis.</p>	<p>Compliant</p>
<b>Workplace Emergency Response Information</b>	<p>27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee’s disability.</p>	<p>Thornhill Medical supports this requirement on an as needed basis.</p>	<p>Compliant</p>
	<p>27.(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p>	<p>With an employee’s consent, information will be provided to an emergency response designate assigned to the person requesting assistance. In the event that the assigned emergency response designate is not available during the time of the incident, the person requiring assistance will identify themselves to the fire warden, manager, or any other employee in the area so an emergency response designate can be assigned and assist the employee.</p>	<p>Compliant</p>
	<p>27.(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need</p>	<p>Thornhill Medical provides the information required as soon as it becomes aware of the need for</p>	<p>Compliant</p>

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	for accommodation due to the employee's disability.	accommodation due to the employee's disability.	
	<p>27.(4) Every employer shall review the individualized workplace emergency response information:</p> <ul style="list-style-type: none"> <li>a) when the employee moves to a different location in the organization.</li> <li>b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>c) when the employer reviews its general emergency response policies.</li> </ul>	<p>a/b) Thornhill Medical complies with this requirement as needed.</p> <p>c) An updated Emergency Preparedness Plan and Policy is currently under review. Individual workplace emergency response information will be reviewed as part of this process.</p>	<p>Compliant</p> <p>The updated Emergency Preparedness Plan and Policy will be completed by June 30, 2024.</p>
<b>Documented Individual Accommodation Plans</b>	<p>28.(1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<p>Thornhill Medical has developed and implemented a written policy and process for individual accommodation plans for employees with disabilities.</p>	<p>Compliant</p>
	<p>28.(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> <li>a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>b) The means by which the employee is assessed on an individual basis.</li> <li>c) The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</li> <li>d) The manner in which the employee can request the participation of a</li> </ul>	<p>Thornhill Medical has a step-by-step process documentation plan that outlines all the elements required under the regulation.</p>	<p>Compliant</p>



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	<p>representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>e) The steps taken to protect the privacy of the employee’s personal information.</p> <p>f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>g) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>h) The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability.</p>		
	<p>28.(3) Individual accommodation plans shall:</p> <p>a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26.</p> <p>b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>c) identify any other accommodation that is to be provided.</p>	<p>Thornhill Medical complies with this requirement as needed.</p>	<p>Compliant</p>
<p><b>Return to Work Process</b></p>	<p>29.(1) Every employer (with over 50 employees) shall:</p> <p>a) develop and have in place a return-to-work process for its employees who</p>	<p>Thornhill Medical has developed and documented a return-to-work policy and process which details the specific plans for</p>	<p>Compliant</p>

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	<p>have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>b) document the process.</p>	<p>employees returning to work following a disability related absence and who require accommodation to return to work.</p>	
	<p>29.(2) The return-to-work process shall:</p> <p>a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>b) use documented individual accommodation plans, as described in section 28, as part of the process.</p>	<p>a) Thornhill Medical’s return to work process outlines the steps it will take to facilitate the return to work of employees absent due to disability or a disability related leave.</p> <p>b) Thornhill Medical will use individual accommodation plans as part of the process.</p>	Compliant
	<p>29.(3) The return-to-work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<p>The return-to-work process does not replace or override any other return-to-work process required by other statute.</p>	Compliant
<b>Performance Management</b>	<p>29.(3) The return-to-work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<p>Thornhill Medical will take into consideration employees with disabilities, as well as individual accommodation plans during the performance review and management process as required.</p>	Compliant
<b>Career Development and Advancement</b>	<p>31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<p>Thornhill Medical will take into consideration employees with disabilities, as well as individual accommodation plans during the career development and advancement review and management process.</p>	Compliant
<b>Redeployment</b>	<p>32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees</p>	<p>This standard is not currently applicable, however, Thornhill Medical will take into</p>	Not Applicable

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	with disabilities, as well as individual accommodation plans, when deploying employees with disabilities.	consideration employees with disabilities, as well as individual accommodation plans during the deployment process as required in the future.	
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