CF Toronto Eaton Centre

Accessibility Policy

January 2023

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Accessibility Policy

In Compliance with AODA O. Reg. 429/07 and O. Reg. 191/11

Up to and Including Compliance Deadlines of 2012-December 2023

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Executive Summary

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is a law passed by the Ontario legislature that is intended to facilitate full accessibility throughout the Province of Ontario for persons with disabilities by 2025.

The AODA will achieve this aim by developing, implementing and regulating Accessibility Standards that will guide the principles and requirements of creating accessibility in the following areas:

- customer service
- information and communications
- transportation
- built environment
- employment

Accessibility Standards will be established by regulation under the Act and will be coordinated with staggering deadlines. It is important to note that 2025 is a proposed end date and obligated organizations will be required to meet accessibility requirements with much earlier timelines.

The first regulated accessibility standard established under the authority of AODA is the Accessibility Standards for Customer Service, Ontario Regulation 429/07, which came into effect on January 1, 2008 and requires compliance by January 1, 2012. In summary, the Regulation requires the creation of an accessible customer service policy and training of all staff, agents and volunteers who provide goods and services on behalf of CF Toronto Eaton Centre.

The second regulated accessibility standard established under the AODA is the Integrated Accessibility Standard, Ontario Regulation O. Reg. 191/11. The Integrated Standard was introduced on June 7, 2011. The Integrated Standard has staggered deadlines beginning in January 2012 and ending in January 2023. This Standard includes the following areas:

- Information and Communications
- Employment
- Transportation (not applicable to Cadillac Fairview) and
- Design of Public Spaces – O. Reg. 413/12

CF Toronto Eaton Centre is the premier shopping centre in the heart of downtown Toronto, located at 220 Yonge St. CF Toronto Eaton Centre is centrally located to serve the shopping needs of nearby communities. CF Toronto Eaton Centre has over 250+ stores including Hudson's Bay, Nordstrom, & Saks Fifth Avenue. This document outlines CF Toronto Eaton Centre's commitment, as well as, procedures and practices in ensuring accessibility to customers and employees with disabilities.

CF Toronto Eaton Centre

Accessibility Policy

1.0 Policy – Purpose and Scope

This policy updates CF Toronto Eaton Centre existing Accessible Customer Service Policy. This policy implements the requirements of both the Accessible Customer Service Standard and the Integrated Accessibility Standards (Information and Communication, Employment, Transportation, Design of Public Spaces), Ontario Regulation 429/07, Ontario Regulation 191/11 and Ontario Regulation 413/12 under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

2.0 Definitions

"Disability" means:

(a) 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 coordination, 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,

(b) a condition of mental impairment or a developmental disability,

(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

(d) a mental disorder, or

(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

The above includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

Information about any person's disability is personal and private and must be treated confidentially.

3.0 CF Toronto Eaton Centre Commitment to Accessibility

In fulfilling our mission, CF Toronto Eaton Centre strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. CF Toronto Eaton Centre is committed to giving people with disabilities the same opportunity or reasonable alternative to access our goods and services and allowing them to benefit from the same or similar services, in the same place and in a similar way as other visitors.

It is the policy of CF Toronto Eaton Centre to promote accessibility for people with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity.

CF Toronto Eaton Centre is committed to compliance with AODA and its accessibility standards. We shall provide accessibility and accommodation for persons with disabilities through AODA's customer service standard, integrated accessibility standard and all other standards as they are developed, and in accordance with the requirements of the Ontario Human Rights Code.

CF Toronto Eaton Centre is committed to excellence in serving all customers, including people with disabilities, and shall carry out its functions and responsibilities in compliance with AODA's Accessibility Standards for Customer Service and Integrated Accessibility Standards as follows:

4.0 Accessible Customer Service Policy

4.1 Communicating with People with Disabilities

CF Toronto Eaton Centre shall take reasonable steps to communicate with persons with disabilities in ways that take into account their disability and accessibility needs.

CF Toronto Eaton Centre shall also ensure that all staff, volunteers and others dealing with the public on behalf of CF Toronto Eaton Centre are properly trained in how to communicate with visitors with various types of disabilities.

4.2 Assistive Devices

For the purposes of this policy:

"Medical aid" means: An assistive device including respirators and portable oxygen supplies.

"Mobility assistive device" means: A cane, walker or similar aid.

"Personal Assistive Devices" means: Any aids including communication, cognition, personal mobility, medical or technical aids that are used to increase, maintain, or improve the functional abilities of persons with disabilities. Assistive devices include, but are not limited to: wheelchairs, walkers, speech synthesizers, TTYs (Telephone Typewriters or Telephone Teletypes), computer technologies, canes and hearing devices.

CF Toronto Eaton Centre is committed to serving people with disabilities, who use assistive devices to obtain, use or benefit from its goods and services.

People with disabilities are permitted and encouraged to use their own personal assistive devices to access our facilities and goods and services. Assistive devices such as communication aids, cognition aids, personal mobility aids and medical aids are allowed to be used at all of our facilities where access is possible at the venue.

CF Toronto Eaton Centre will ensure the public is informed of any and all assistive devices that are available for their use while at CF Toronto Eaton Centre. Wheelchairs are available on loan but require photo identification (passport, Driver's license, or Permanent Resident card) and a $40.00 cash deposit. Upon return of the equipment borrowed, the full deposit will be refunded. These are available at the Guest Services desk, located on Level 2.

CF Toronto Eaton Centre will also ensure the public is informed of accessibility features available for their use while at CF Toronto Eaton Centre including elevator and accessible washroom locations.

CF Toronto Eaton Centre shall also ensure that staff knows how to use assistive devices that are available to customers of CF Toronto Eaton Centre and where to locate elevators and accessible washrooms within the facility.

CF Toronto Eaton Centre shall also ensure that all staff and agents serving the public on behalf of CF Toronto Eaton Centre are properly trained and familiar with various assistive devices that may be used by customers with disabilities while accessing its goods and services.

4.3 Service Animals

For the purposes of this policy a:

"Guide Dog" means: A guide dog as defined in section 1 of the *Blind Persons Rights' Act.*

"Service Animal" means: An animal that is of service to a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability. Verification of a service animal's status can be provided by way of government certification or by a letter from a physician or nurse confirming the animal is required. It is *"readily apparent"* that an animal is a service animal when it is obvious by its appearance or by what it is doing. For example, it may be readily apparent that an animal is a service animal if it is wearing a harness, saddles bags, a sign that identifies it as a service animal or has a certificate or identification card from a service animal training school or an identification card from the Attorney General of Ontario. It may also be readily apparent if a person is using the animal to assist him or her in doing things, such as opening doors or retrieving items.

A visitor to CF Toronto Eaton Centre can to be accompanied by his or her guide dog or other service animal within all areas of CF Toronto Eaton Centre except where areas are restricted to employees or prohibited by law.

Ontario Regulation 562 under the Health Protection and Promotion Act states that animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does make an exception for service animals to allow them to go where food is normally served, sold or offered for sale.

There may be rare circumstances where, for the reasons of health and safety of another person, someone with a service animal may be excluded. In these rare situations, CF Toronto Eaton Centre's Security Manager shall be immediately notified. The Security Manager shall consider all relevant factors and options in trying to find a solution that meets the needs of both individuals.

4.4 Support Persons

For the purposes of this policy a:

"Support Person" means: Any one person who accompanies a person with a disability in order to help that individual with communication, mobility, personal care or medical needs or with access to goods or services.

A support person may assist a person with a disability in using the washroom or change room or assist a person with speech impairment to facilitate communication. A support person may be a paid professional, a volunteer, a family member or friend of the person with a disability.

At no time shall a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on CF Toronto Eaton Centre premises.

4.5 Notification of Disruptions in Service

Persons with disabilities often rely on specific facilities and services at CF Toronto Eaton Centre and as such, disruption in their operations may negatively affect the customer experience while visiting the centre. Elevators, Personal Elevating Devices, Perimeter Access, Barrier Free Washrooms, Water, and Heating & Air-conditioning are among those services and as such; disruption in their operations must be communicated appropriately.

All CF Toronto Eaton Centre administration staff, customer service and building operations personnel will be informed immediately upon identifying that one of the above facility services are disrupted.

4.5.1 Notice of a Planned Service Disruption to Base Building Accessibility Services

1) Internal Department heads for Operations and Security & Life Safety shall notify of any planned or future disruptions in advance of 7 days.

2) Members of Operations, Security & Life Safety and Guest Services shall notify Tenants by way of e-mail and / or written memorandum of the disruption.

3) The tenant communication shall contain the following information;

    i) How long the disruption is expected to last;
    ii) What alternative facilities or services exist.

4) Individual tenants will communicate internally to its staff and advise staff to contact stakeholders and clients scheduled for appointments about the service disruption as applicable.

5) As a general rule, planned disruptions shall be communicated to affected tenants in advance of seven days. Tenant contacts are responsible for their respective internal communications.

6) Upon restoration of the service Members of Operations, Security & Life Safety and Guest Services shall notify the tenant contacts via email or written memorandum and advise that the service disruption has ended.

7) CF Toronto Eaton Centre shall notify the public in advance of any planned service disruptions, by way of posting on the property's website any planned or future work that may affect these services and posting signage at the entrances closest to facility affected by the planned disruption. Notice should include:

    i) the reason for the disruption
    ii) its anticipated duration
    iii) a description of alternative facilities or services, if available.

4.5.2 Notice of an Unplanned (Unexpected or Emergency) Disruption to Base Building Accessibility Services

Once an unplanned disruption of base building services has been identified, notice should be provided as soon as possible to ensure timely notification to Tenant Contacts.

1) CF Toronto Eaton Centre's Internal Department Heads are to notify Security & Life Safety Manager and Operations Manager of any unplanned disruptions.

2) The Members of Operations, Security & Life Safety and Guest Services shall notify Tenant Contacts by way phone and/or written communication.

3) The tenant communication and / or Emergency Notification System message shall contain the following information;

    iii) How long the disruption is expected to last;
    iv) What alternative facilities or services exist.

4) Individual tenants will communicate internally to its staff and advise staff to contact stakeholders and clients about the service disruption as applicable.

5) Upon restoration of the service disruption Members of Operations, Security & Life Safety and Guest Services shall notify the tenant contacts via email or written memorandum and advise that the service disruption has ended.

4.5.3 Tenant Service Disruption – Isolated to specific Tenant / Floor

1) CF Toronto Eaton Centre's Tenant or applicable representative to notify Operations Manager and/or Security Manager of the disruption.

2) Security & Life Safety Manager to begin investigation to determine if the service disruption is isolated or building wide.

3) If the disruption is identified as being isolated, tenant notifications shall be made to the affected areas by way of email or written memorandum.

4) The tenant communication and / or Emergency Notification System message shall contain the following information:

    v) How long the disruption is expected to last;
    vi) What alternative facilities or services exist.

5) If the disruption affects the tenant's capability of conducting business, Operations Manager and / or Security & Life Safety Manager shall also provide notification within the Common Area of the affected devices with the intent of notifying visitors of the disruption prior to attending the tenant suite.

6) Individual tenants will communicate internally to its staff and advise staff to contact stakeholders and clients scheduled for appointments about the service disruption as applicable.

7) Upon restoration of the service disruption, Security Manager shall notify the tenant contacts via email or written memorandum and advise that the service disruption has ended. All applicable signage shall be removed at such time.

8) CF Toronto Eaton Centre will inform members of the public who are on-site of any unplanned disruptions in the following ways:

- Facilities and Service disruptions will be posted on the CF Toronto Eaton Centre website; https://shops.cadillacfairview.com/property/cf-toronto-eaton-centre/accessibility
- Signage will be posted at all six public exterior entrances to the mall
- Signage will be posted in the interior of the mall where customers may have entered through stores that have public exterior entrances.

5.0 Information and Communication Policy

For the purposes of this policy an:

"Accessible Communication Supports" means: Captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"Accessible Formats" means: Large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

"Extranet website" means a controlled extension of the intranet, or internal network of an organization to outside users over the Internet;

"Internet website" means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public;

"Intranet website" means an organization's internal website that is used to privately and securely share any part of the organization's information or operational systems within the organization and includes extranet websites;

"New internet website" means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh;

"New intranet website" means either an intranet website with a new domain name or an intranet website with an existing domain name undergoing a significant refresh;

5.1 Website Accessibility

Beginning January 1, 2014, any new website design, new internet website or intranet website, or web-based applications that Cadillac Fairview controls directly or through a contractual relationship that allows for modification of a product will also conform to W3C WCAG 2.0 Level A.

5.2 Availability of Information in Alternate Format

CF Toronto Eaton Centre information will be made available to the public in an accessible format or via accessible communication support upon request. Timeframes for providing these formats will be dependent upon the format requested but will be provided as soon as is practicable.

6.0 Employment Policy

Accommodation **shall** be provided to applicants selected to participate in assessment or selection process, upon request. Suitable accommodation **shall** be provided in manner that takes applicant's accessibility needs.

Successful applicant **shall** be informed of availability of accommodation and **shall** be provided with accommodation policy when making offer of employment.

6.1 Workplace Emergency Response Information

Workplace Emergency procedures, plans and safety information will be made available to CF Toronto Eaton Centre staff in an accessible format or via accessible communication support upon request. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable.

6.2 Individualized Emergency Response Plans for Cadillac Fairview Employees

CF Toronto Eaton Centre's staff with disabilities that may require assistance in an emergency situation are encouraged to identify their accessibility needs to their immediate supervisor so that individualized emergency accommodation plans can be created. Individualized plans will be created using the company's template. The

emergency response plan may include other employees assisting the person with the disability. With the consent of the employee requesting assistance, the emergency response plan shall be shared with individuals designated to provide assistance. This information will be maintained confidentially.

7.0 Training

In maintaining CF Toronto Eaton Centre's commitment in ensuring the "customer experience" to all visitors, a training program will be initiated for all customer service and security personnel. The training program is internet based and provides information on providing assistance to persons with various disabilities.

Topics reviewed within the program include:

1. An overview of the purposes of the AODA;

2. Overview of Accessible Customer Service and Integrated Accessibility Standard requirements

3. Instruction on how to interact and communicate with people with various types of disabilities

4. Information on inappropriate ways of interacting with persons with disabilities.

5. Overview of the company's obligation to provide information in alternate formats and alternate communication supports upon request including:

    a. Review of different types of alternate formats

    b. Review of alternate communication supports (sign language, gestures, boards with symbols, voice-synthesizers, etc.)

    c. Review of company's alternate format service provider (when identified) and process relating to securing information in alternate formats

    d. Review of tracking system used for alternate formats upon request

6. Instruction on interacting with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal or a support person

7. Information on how to use equipment or devices available at CF Toronto Eaton Centre, that may help people with disabilities access our tenant's services, such as: wheelchairs, elevators, escalators, automatic door openers.

8. Instruction on procedures for what to do if a person with a disability is having difficulty accessing CF Toronto Eaton Centre or one of its many tenants.

9. Information contained within this document.

In addition to the above customer service training, management and supervisory staff will be trained in our obligations under the Ontario Human Rights Code.

Training records for the above training will be kept at Cadillac Fairview Organizational Development office at 20 Queen Street West, 5th Floor, Toronto, ON M5H 3R4.
Training records contain the names of CF Toronto Eaton Centre personnel and the dates in which the training was completed.

CF Toronto Eaton Centre will maintain ongoing training with all employees on an as needed basis.

8.0 Customer Service Feedback Process

In ensuring the CF Toronto Eaton Centre maintains the highest level of service to visitors; a process of receiving customer service feedback has been established.

Upon receipt of any complaint, the employee receiving the complaint shall immediately forward it to Security & Life Safety Manager. An initial response will be made as soon as possible, normally within three business days acknowledging receipt and that the complaint is being reviewed. CF Toronto Eaton Centre will take into account a person's accessibility needs when communicating, receiving and/or responding to the complaint.

Corporate Communications is available to provide support if additional assistance is required. In such cases, please contact **Corporate Communications @ 416-598-8200**.

All inquiries, customer feedback and complaints may be submitted in one of the following ways:

In person (Orally): **CF Toronto Eaton Centre**

Guest Services Centre, Level 2
Monday – Friday 10:00am – 9:00pm
Saturday 10:00am – 9:00pm
Sunday 11:00am – 7:00pm

By telephone: **CF Toronto Eaton Centre**

Guest Services
416-598-8560

In writing: **CF Toronto Eaton Centre, Administration Office**

220 Yonge Street, Suite 110, Toronto, ON M5B 2H1

Electronic Mail: **tecguestservices@cadillacfairview.com**

Customers with disabilities are welcomed to provide feedback in any manner deemed most convenient. Responses to feedback received from customers with disabilities will be provided in alternate formats or alternate communication supports upon request.

9.0 Multi-Year Accessibility Plan and Annual Progress Reports

Cadillac Fairview and CF Toronto Eaton Centre will draft and make public a Multi-Year Accessibility Plan to address compliance requirements of O. Reg. 191/11 and O. Reg. 413/12. Cadillac Fairview and CF Toronto Eaton Centre will also draft and make public annual progress reports outlining steps taken to meet the goals and objectives of the Multi-Year Plan.

10.0 Emergency Preparedness

Management of incidents involving persons with disabilities is covered in the respective property Emergency Response Plan, and in case of fire, under the specific Fire Response Plan. These plans describe the operational and personnel requirements for assisting persons with disabilities and their support parties or animals.

10.1 Emergency Procedures, Plans and Public Safety Information

Emergency procedures, plans and public safety information that are available to the public, including any relevant updates, will be made available to the public and in an accessible format or via accessible communication support upon request. Timeframes for provision of this information will be dependent upon the format requested but will be provided as soon as is practicable.

CF Toronto Eaton Centre staff will be trained in emergency response policies and procedures as they relate to people with disabilities, including how to communicate emergency information, how to offer evacuation assistance to people with disabilities and how to identify accessible and safe evacuation routes.

In addition to the existing plans, it is prudent to maintain some basic equipment on site that may be of use to persons needing assistance because of disabilities.

Equipment that may be of use includes:

For High Rise or Multiple Levels Buildings

a) Wheelchairs, Rescue Chairs or Manual Lifting Devices
b) Predetermined Waiting Areas on Each Floor

For All Properties

a) Wheelchairs and personal walking canes
b) Batteries
c) Writing board and writing materials

11.0 Communication Plan and Availability of this Policy

CF Toronto Eaton Centre shall notify the public of the availability of these policies and procedures and of our compliance with the AODA's Accessibility Standards for Customer Service and Integrated Accessibility Standards. Therefore, if any person requests a copy of this policy we will provide a copy taking into account the person's accessibility needs. This may include, but is not limited to, using the following formats:

- Large print, Braille,
- Audio format such as CD or digital audio format;
- Easy-read, simplified summaries of materials

CF Toronto Eaton Centre has its own provider for alternate formats. To arrange for alternate formats for this policy for people with disabilities upon request, please contact:

CF Toronto Eaton Centre, Administration Office

220 Yonge Street, Suite 110, Toronto, ON M5B 2H1

A copy of this policy will also be posted on the CF Toronto Eaton Centre website: https://shops.cadillacfairview.com/property/cf-toronto-eaton-centre/accessibility

12.0 Review Process

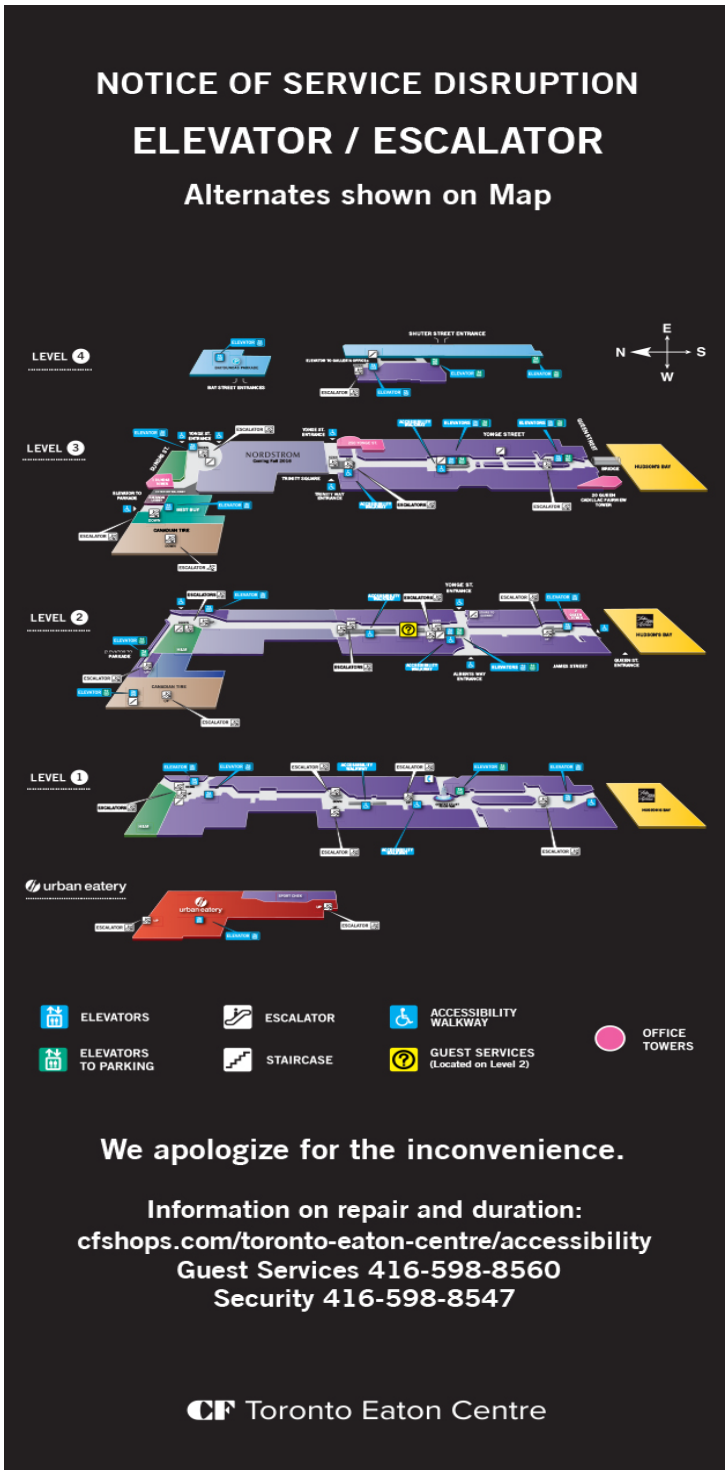
At minimum, this policy will be reviewed annually by appropriate CF Toronto Eaton Centre staff. The review process, however, may be affected by AODA Regulations as they are announced. This policy, therefore, will also be reviewed upon announcement of any new Accessibility Standards of the AODA, 2005 to ensure integration and consistency with this policy. The policy may be modified to ensure full compliance with the AODA, 2005.

ORIGINAL POLICY DATE: October 31, 2011

LAST UPDATE: December 2022

RESPONSIBLE DEPT: CF Toronto Eaton Centre Administration

site plan


NOTICE OF SERVICE DISRUPTION
ELEVATOR / ESCALATOR
Alternates shown on Map
LEVEL 4
LEVEL 3
LEVEL 2
LEVEL 1
urban eatery
E
N
S
W
ELEVATORS
ESCALATOR
ACCESSIBILITY WALKWAY
OFFICE TOWERS
ELEVATORS TO PARKING
STAIRCASE
GUEST SERVICES (Located on Level 2)
We apologize for the inconvenience.
Information on repair and duration:
cfshops.com/toronto-eaton-centre/accessibility
Guest Services 416-598-8560
Security 416-598-8547
CF Toronto Eaton Centre