



Accessibility Policy

Applicable to those employed by Saba in Canada, those in Canada for work-related purposes and those interacting with customers located in Canada on Saba's behalf

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1. Purpose

Under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), the Government of Ontario has developed a phased-in approach to reaching its objective of making the province of Ontario fully accessible by 2025. This Policy outlines the rules and principles that Saba's Canadian subsidiaries and affiliates ("**Saba**") will implement and maintain in order to meet the requirements under the AODA and its regulations.

2. Scope

This Policy applies to Saba, those employed by Saba in Canada, those in Canada for work-related purposes, and those interacting with customers located in Canada on Saba's behalf, regardless of their role (including agents and contractors who interact with customers located in Canada on Saba's behalf) (collectively, "**Saba Representatives**").

It is the responsibility of the person with the disability to ensure that the Saba Representative is aware of the extent of their disability and any specific assistance that they may require.

3. Definitions

As used in this Policy:

"**customer**" shall include both existing customers, as well as prospects who are still evaluating Saba's goods and services.

"**disability**" shall have the same meaning as set out in the *Human Rights Code (Ontario)*, as amended from time to time.

4. Statement of Commitment

As outlined in the AODA's Accessible Customer Service Standards, Saba is committed to providing access to its facilities and delivering excellent customer service at all times for clients and visitors, and in a way that respects the dignity and independence of people with disabilities.

Further, Saba is committed to creating and maintaining an equitable and integrated environment whereby every employee receives equal opportunity with respect to employment and receives accommodation where required, in accordance with the provisions of the AODA and its Integrated Accessibility Standards Regulation (191/11).

5. Providing Goods and Services to People with Disabilities:

Saba will provide access to its goods and services to people with disabilities in the following ways:

5.1. Communication

Saba will identify and implement mechanisms designed to ensure it is capable of communicating with people with disabilities seeking to access and obtain its goods and services in ways that take the person's disability into account.

5.2. Assistive Devices

Saba will facilitate the use of assistive devices by people with disabilities in order to access and obtain Saba's goods and services, unless otherwise prohibited due to health and safety or privacy concerns.

It is the responsibility of the person with the disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.



5.3. Service Animals and Support People

Service Animals

Saba will permit people with disabilities to be accompanied by their service animal and to keep the service animal with them when accessing parts of its premises which are open to customers, unless the animal is otherwise prohibited by law from doing so.

If service animals are prohibited by law from accessing certain parts of its premises, Saba will make recommendations and appropriate accommodations to ensure that people with disabilities are still able to access and obtain Saba's goods and services without using their service animal.

It is the responsibility of the person with the disability to ensure that his or her service animal is kept in control at all times.

Support People

Saba will permit people with disabilities to be accompanied by a support person when accessing parts of its premises which are open to customers.

In the event that proprietary or confidential information of Saba is being disclosed in the presence of a support person who is not covered by a non-disclosure agreement, Saba may require that a separate non-disclosure agreement be signed with the support person.

5.4. Temporary Disruptions to Accessible Goods and Services

Saba will provide notice in the event of a planned or unexpected disruption in the facilities or accessible services usually used by people with disabilities to access Saba's goods or services. Although Saba cannot provide the same guarantee in emergency temporary disruption situations, every reasonable effort will be made to give adequate notice. A notice regarding a temporary disruption will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

5.5. Feedback Procedure

Saba welcomes feedback regarding the way in which the company provides services to persons with disabilities. To provide feedback regarding Saba's Accessibility Policy please email accessibility@saba.com.

5.6. Training

Training is provided to all Saba Representatives on the purpose and requirements of the AODA legislation and specifically on how to:

- interact and communicate with people with various types of disabilities;
- interact with people who use assistive devices or require the assistance of a service animal or a support person;
- use equipment or devices available on-site or otherwise that may help with providing services to people with disabilities; and
- assist a client or visitor who is having difficulty accessing Saba's services.

Training is provided to Saba Representatives annually and on an ongoing basis whenever changes are made to relevant policies and procedures. Saba will maintain records of the training provided, including the dates of the training and the number of (or the names of the) people trained.

5.7. Availability of Documents

This Policy and other non-confidential documents which relate to the provision of Saba's goods and services to people with disabilities shall be posted on Saba's website. Where a person requests such document in an



alternative format due to a disability, Saba will provide the document in an alternative format, as mutually agreed by Saba and the individual.

Saba will post a notice on its website confirming that such documents are available in alternative formats upon request, and anyone enquiring in writing or by phone will also be informed of this fact.

5.8. Accessible Emergency Information

Saba will provide its customers with information concerning emergency procedures in an accessible manner upon request.

5.9. Accessible Websites and Web Content

Saba is committed to ensuring that the information it makes available on its websites is accessible to all users:

- By January 1, 2014, new internet websites and web content on those sites will conform with WCAG 2.0 Level A.
- By January 1, 2021, all internet websites and web content will conform with WCAG 2.0 Level AA, other than,
 - i. success criteria 1.2.4 Captions (Live), and
 - ii. Success criteria 1.2.5 Audio Descriptions (Pre-recorded).

6. Employment:

Saba will create and maintain an equitable and integrated environment whereby every employee receives equal opportunity with respect to employment and receives accommodation where required, as follows:

6.1. Recruitment

Saba will notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its recruitment and hiring process.

6.2. Availability of Documents

Upon request by an employee or applicant with a disability, Saba will consult with the employee/applicant to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to apply for or perform his/her job (as applicable), and information that is generally available to other employees in the workplace.

6.3. Informing Employees of Supports

Saba will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities. This information will be provided to new employees as soon as practicable after commencing employment.

6.4. Individual Accommodation Plans

Saba will put in place a process to develop individual accommodation plans for employees with disabilities.

6.5. Return to Work Process

Saba will put in place a return to work process for employees who have been absent from work due to a disability.

6.6. Performance Management, Career Development and Advancement, and Redeployment

Saba's performance management, career development and redeployment processes will take into account the accessibility needs of its employees.

6.7. Accessible Emergency Information

Saba will provide employees with disabilities with individualized emergency response information when necessary.