

Element Fleet Management ("Element") Accessibility Policy

Introduction

Consistent with our Code of Conduct and Ethics, Element Fleet Management ("Element") is committed to diversity, equity, inclusion, and accessibility for persons with disabilities. Element will work with its employees, and clients in a manner that respects dignity and independence to provide programs, services, and an environment free of barriers.

Scope

The policy is applicable in Canada; however, may be modified and adopted for use in other countries where Element has business and operations. The policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Element.

Our Commitment to Our People and Clients

Element is committed to enabling an environment for people of all abilities. This includes:

- Considering a person's disability when communicating with them.
- Allowing assistive devices, service animals and support persons in the workplace.
- Inviting employees and clients to provide feedback.

Communication

Element is committed to communicating with persons with disabilities in ways that consider the disability and ensures they are able to participate, compete or partake in the Element offering or work. Upon request, Element will consult with the individual to arrange for communications support and/or provide information in an accessible format at any point of the relationship. This includes, but is not limited to, providing material in larger print when requested or meeting clients on the main floor of the workplace or off site at a location chosen by the client. Element also meets internationally recognized WCAG 2.0 Level AA website requirements.

When necessary, Element will provide individualized workplace emergency response information to employees who have a disability. If the employee will require assistance in an emergency, Element will, with the employee's consent, provide the workplace

emergency response information to the person designated to aid the employee. Individualized workplace emergency response plans are reviewed as required.

Assistive Devices

Element welcomes persons with disabilities to use their own assistive devices while on the premises and/or while performing work for, or on behalf of, Element. Personal assistive devices are the responsibility of the owner and can include wheelchairs, hearing aids, white canes, and speech amplification devices. Every effort will be made to facilitate and accommodate the use of assistive devices at Element. Examples include, but are not limited to, providing additional space to accommodate the assistive device, ensuring power source access, or providing additional power requirements. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with the disability can access Element's services and facilities.

Service Animals

For persons with disabilities who rely on service animals, Element welcomes service animals onto its premises. Element will advise the parties of any associated requirements and accommodations as required by the Landlord/Lessor in association with building and property use and access.

Support Persons

An employee or client with a disability who is accompanied by a support person will be allowed to have that person accompany them on Company premises. A support person may be a personal support worker, a volunteer, a family member, or a friend, who may assist with communicating, mobility, personal care or medical needs.

Apart from service animals and support persons mentioned above, other types of service and support assistance will be considered on a case-by-case basis and may require the provision of supporting documentation.

Notice of Temporary Disruption

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Element. In the event of any temporary disruptions to facilities or services, reasonable efforts will be made to provide advanced notice. In some circumstances such as unplanned temporary disruptions, those affected will be notified promptly. Notifications may include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

When disruptions occur Element will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Element website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Training for Our People

Element employees will receive training on the Accessibility for Ontarians with Disabilities Act, applicable provisions of the Ontario Human Rights Code, Element's accessibility policies, and providing accessible customer service.

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard;
- The Company's plan related to the customer service standard;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person; and
- What to do if a person with a disability is having difficulty accessing Element's services.

Training occurs as part of orientation and then on an ongoing basis as changes are made to applicable policies, programs or procedures. Element maintains records of the training provided.

Feedback Process

Element encourages and welcomes feedback on how it provides programs and services to persons with disabilities and will ensure our feedback process is accessible by providing or arranging for accessible formats and communication supports, on request. Feedback can be provided to [Element People Services](#), or by phone and in-person upon request. Feedback will be reviewed, appropriate action taken, and Element will make every effort to respond to the feedback quickly and effectively.

Available Documentation

Element will provide these documents in an accessible format or with communication support, on request.

Administration

Every effort was made to ensure that this policy complies with all applicable provincial employment legislation at the time of its publication. However, standards can vary widely between various jurisdictions and are frequently changing. In the event of any discrepancy between this policy and the employees prevailing jurisdiction, the prevailing legislature will apply to determine an employee's rights and entitlements. Employees having questions about how this policy applies to their locality should contact Human Resources for more information.

These guidelines are administered by Human Resources. They are regularly reviewed and may be updated at any time.

Original: December 2017

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Element Multi-Year Accessibility Plan is located [here](#).