

Accessibility Policy and Multi-Year Accessibility Plan for Enterprise Holdings

*Created: February 2016
Last Update: February 2020*

In 2005, the Ontario Government set the goal of a “barrier-free Ontario” for people with disabilities by creating the *Accessibility for Ontarians with Disabilities Act, 2005* (“the Act” or “AODA”). The *Integrated Accessibility Standards, Ontario Regulation 191/11* (the “IASR”), was also created to set out the steps that organizations, including Enterprise Rent-A-Car Canada Company, operator of the Enterprise Rent-A-Car, National Car Rental and Alamo Rent-a-Car brands in Canada (“Enterprise Holdings” or the “Company”), must take to meet this laudable goal. The *IASR* covers accessibility standards in customer service, information and communications, employment, transportation and the built environment.

Enterprise Holdings is committed to helping Ontario become more accessible. **Enterprise Holdings** has already complied with the *IASR*’s Accessibility Standards for Customer Service by creating internal policies, practices and procedures which recognize the role **Enterprise Holdings** will play in making Ontario more accessible. These initiatives included the creation of a training program for employees on the *AODA* and how to provide accessible services. **Enterprise Holdings** has also developed a feedback process, via email at ChiefAccessibilityOfficer@ehi.com and in hard-copy form available at our stores to help ensure that we maintain our high level of accessibility.

This Accessibility Policy and Multi-Year Accessibility Plan outlines the policies, procedures and actions that **Enterprise Holdings** will put and has put in place to comply with the remaining requirements of the *Act* and the *IASR*.

Statement of Commitment

Enterprise Holdings is committed to improving accessibility for individuals with disabilities and treating all people in a way that allows them to maintain their dignity and independence. **Enterprise Holdings** will continue to meet the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Act* and the *IASR*.

Barrier Assessment

In accordance with *AODA* and **Enterprise Holdings**’ goal of providing an inclusive workplace, this Accessibility Policy and Multi-Year Accessibility Plan seeks to eliminate and prevent barriers to accessibility. Typical barriers experienced by individuals with disabilities include physical, communication and technology, attitudinal and systemic barriers.

Accessible Emergency Information

Enterprise Holdings is committed to providing its customers, clients and the general public with safety information that is prepared by **Enterprise Holdings** and subsequently made available to the public, in an accessible way, upon request.

Implementation Timeframe:

Effective January 1, 2012 and ongoing as applicable.

Workplace Emergency Response Information

Enterprise Holdings has provided or will provide individualized workplace emergency response information to Company employees who have a disability that requires accommodation through the provision of such information. Individualized workplace emergency response information will be provided as soon as practicable after the Company becomes aware of the need for accommodation due to the employee's disability.

If an employee requires assistance in the case of an emergency, with the employee's consent, **Enterprise Holdings** shall provide the individualized workplace emergency response information to the person designated by **Enterprise Holdings** to provide assistance to the employee.

Where the Company has provided individualized workplace emergency response information to an employee, **Enterprise Holdings** will:

- Communicate that information, on an as needed basis and as soon as practicable, to the employee's respective manager and Health & Safety personnel while respecting the privacy of the employee's personal information; and,
- Review the individualized workplace emergency response information when the employee is moved to a different location in the Company, when the employee's overall accommodation needs change or are reviewed, and/or when the Company reviews its general emergency response policies.

Implementation Timeframe:

By January 1, 2016 and ongoing, as applicable.

Training

Enterprise Holdings will provide training to employees, volunteers, third party contractors, and every person who participates in developing **Enterprise Holdings'** organizational policies, and every other person who provides goods, services or facilities on behalf of **Enterprise Holdings**, on Ontario's accessibility laws and on the *Human Rights Code* ("the Code") as it relates to people with disabilities. Training will be provided in a way that best suits the duties of particular persons being trained. Training will be provided in a way that best suits the duties of the particular persons being trained.

In accordance with the *IASR*, **Enterprise Holdings** has taken the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws by January 1, 2015 and will continue to take these steps, as applicable:

- **Enterprise Holdings** will determine the training requirements of the accessibility standards referred to under the *IASR* and on the *Code* as it pertains to persons with disabilities;
- **Enterprise Holdings** will utilize its training resources to determine appropriate training methods and delivery for the Ontario stores and office locations;
- **Enterprise Holdings** will ensure training is provided to all employees, volunteers, persons developing organizational policies, third party contractors, and every other person who provides goods, services or facilities on behalf of the Company in Ontario;
- **Enterprise Holdings** will maintain training dates and other information regarding who has been trained, including the number of individuals to whom the training has been provided;
- **Enterprise Holdings** will ensure training is provided on any related policy changes;
- **Enterprise Holdings** will post accessibility training materials onto its Intranet Portal "the Hub" for internal use by its employees;
- **Enterprise Holdings** will prepare a document that describes the Company's training policy, summarizes the content of the training, and specifies when the training is to be provided, and give a copy of the document to any person upon request. Notice that such document is available, on request, to the public will be posted on **Enterprise Holdings'** website.

Implementation Timeframe:

Effective January 1, 2012 and ongoing as applicable.

Self-Service Kiosks

Enterprise Holdings has taken or will take the following steps to ensure employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks:

- **Enterprise Holdings'** Airports and Operations departments will be consulted and trained on considering the needs of people with disabilities when designing self-service kiosks.
- New build and redesign processes will be augmented with accessibility criteria.
- The Airports and Operations departments will consider what features can be cost-effectively built into existing and new self-serve kiosks to make those kiosks more accessible. Such features will be implemented as appropriate. This is to ensure effective communication methods are provided to people with disabilities at self-service kiosks.
- When procuring self-service kiosks, accessibility features will be incorporated into the procurement process.
- Employees will be trained to assist individuals with accessibility features built into any existing or new kiosks.

Implementation Timeframe:

Effective January 1, 2014 and ongoing as applicable.

Information and Communications

Enterprise Holdings is committed to meeting the information and communication needs of people with disabilities. We will consult with customers with disabilities to determine their specific information and communication needs.

Accessible Formats and Communication Supports

Enterprise Holdings has taken or will take the following steps to make sure all publicly available information is made accessible upon request by **January 1, 2016**:

- **Enterprise Holdings** will respond to requests in a timely manner that takes into account the person making the request's accessibility needs due to disability;
- **Enterprise Holdings** will consult with the person making the request in determining the suitability of an accessible format or communication support.
- **Enterprise Holdings** will have a process in place for persons with disabilities to be provided with information and communication in an accessible format and provide such information or explain, in writing, when an accessible format is not feasible and why.
- **Enterprise Holdings** will train staff who may receive request for accessible information on how to manage requests and obtain accessible formats.
- **Enterprise Holdings** will provide publicly available information at a cost that is no more than the regular cost charged to other persons.
- **Enterprise Holdings** will notify the public about the availability of accessible formats and communications supports.

Implementation Timeframe:

By January 1, 2016 and ongoing as applicable.

Websites

Enterprise Holdings has taken steps to ensure all new websites and new web content conform with WCAG 2.0, Level A.

Enterprise Holdings will take the following steps to make any public websites and web content conform to WCAG 2.0, Level AA by **January 1, 2021**:

- **Enterprise Holdings** will incorporate into the Company's website project management a requirement that all new websites and web content conform with the WCAG 2.0 Level AA.
- **Enterprise Holdings** will assess and evaluate all public websites and public web content in Ontario for conformance with accessibility standards.

- If not in conformance with WCAG 2.0 Level AA, **Enterprise Holdings** will consult with its internal IT department and external consultants, as needed, regarding necessary changes to bring to the websites and web content into compliance.
- **Enterprise Holdings** will engage the services of an external website consultant will be engaged to make the above improvements to the websites and web content to the extent the internal IT department is unable to make the necessary changes.
- **Enterprise Holdings** will ensure that necessary improvements to the website and/or web content are made by the internal IT department or third party provider.

Implementation Timeframe:

By January 1, 2021 and ongoing as applicable.

Feedback

Enterprise Holdings has taken or will take the following steps to ensure existing feedback processes are accessible to persons with disabilities upon request by **January 1, 2015**:

- **Enterprise Holdings** will identify all existing feedback processes and accessibility barriers pertaining to these processes.
- **Enterprise Holdings** will ensure processes are accessible by making available the accessibility feedback process to customers, employees and third parties requesting accessible formats of the feedback process.
- **Enterprise Holdings** will make the feedback process accessible on its website(s).
- **Enterprise Holdings** will advise customers and clients that feedback can be given in person, by mail, by phone, by fax or by e-mail to:

Chief Accessibility Officer – Enterprise Holdings
 280 Attwell Drive
 Etobicoke, ON M9W 5B2
 Telephone: (416) 679-7481
 Facsimile: (833) 811-4173
 E-mail: chiefaccessibilityofficer@ehi.com

- **Enterprise Holdings** will respond to all requests for alternate accessible formats of feedback processes in a timely manner and make known the supports that are available to facilitate the submission of feedback.
- **Enterprise Holdings** will commit to responding to feedback as soon as practicable.

Enterprise Holdings has established a process for receiving and responding to feedback about the manner in which it provides goods, services or facilities to persons with disabilities and the feedback process itself. **Enterprise Holdings** will advise the public, via its website, that such feedback process is available and that the Company has prepared a document describing the accessibility feedback process, which is available on request. Such document specifies the actions that **Enterprise Holdings** will take if a complaint is received. Such document is available on request.

Enterprise Holdings will ensure that the accessibility feedback process is itself accessible to persons with disabilities.

Enterprise Holdings will provide its customers and members of the public with information in an accessible format upon request. **Enterprise Holdings** will respond to such requests within 72 hours.

Implementation Timeframe:

By January 1, 2015 and ongoing as applicable.

Employment

Enterprise Holdings is committed to fair and accessible employment practices that attract and retain persons with disabilities. This includes ensuring accessibility through all stages, practices and policies of the employment cycle.

Enterprise Holdings has taken or will take the following steps by **January 1, 2016** to notify the public and staff that it will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- **Enterprise Holdings** will include a statement in any job advertisements that **Enterprise Holdings** will hire individuals with disabilities and will provide accommodations during the recruitment process.
- If a job applicant requests accommodation, **Enterprise Holdings** will consult with the individual and make adjustments that best suit his/her accessibility needs due to disability in relation to the materials or processes to be used and to the extent required by law.
- **Enterprise Holdings** will confirm, in any interview, that it will hire individuals with disabilities.
- **Enterprise Holdings** will notify successful applicants of its policies for accommodating employees with disabilities in any offer letter.
- **Enterprise Holdings** will include in the **Enterprise Holdings** “New Hire Orientation” training program a section on accessibility and the *Code*, as appropriate.
- **Enterprise Holdings** will advise current employees of the policies on accessibility and the *Code* that are accessible on the Company’s Intranet Portal “the Hub”.
- **Enterprise Holdings** will advise employees when any changes are made to the above policies.
- **Enterprise Holdings** will review existing policies and procedures, and where necessary, augment processes for persons with disabilities.

Enterprise Holdings will develop and put in place a process for designing Individual Accommodation Plans (“IAPs”) and a return-to-work process for employees that have been absent due to a disability:

- The process to develop an IAP will include the following:
 - The manner in which the employee can participate in the development of the IAP;
 - The means by which an employee is to be assessed on an individual basis;
 - Identification of accommodation(s) to be provided;
 - Timelines for the provision of accommodation(s);

- The manner in which the employee can request the participation of a representative;
 - How **Enterprise Holdings** may request an evaluation by outside medical or other expert, at the Company's expense, to assist with determining necessary accommodation(s) and how to achieve said accommodation(s);
 - Steps to be taken to protect the privacy of the employee's personal information;
 - The frequency with which the IAP will be reviewed and updated and the manner in which this will be done;
 - If an accommodation is denied, the manner in which the reasons for denial are to be provided to the employee; and
 - The means of providing accessible formats or communication supports that take into account the employee's accessibility needs due to disability.
- The return-to-work process shall:
 - Outline the steps that **Enterprise Holdings** will take to facilitate the return to work of employees who were absent because their disability required them to be away from work;
 - Use the IAPs outlined above as part of the process; and
 - IAPs may also include information regarding accessible formats and communication supports or workplace emergency response information.

Enterprise Holdings will take the following steps to ensure the accessibility needs of persons with disabilities are taken into account if **Enterprise Holdings** uses performance management, career development and advancement, and/or redeployment processes or systems:

- **Enterprise Holdings** will review existing policies and procedures and amend where necessary to ensure compliance with the *IASR*.
- **Enterprise Holdings** will make, where required and practicable, documents related to performance management or career development and advancement or redeployment available in accessible formats or with communication supports upon request.
- **Enterprise Holdings** will update an IAP, with the employee's participation, if appropriate, in the event that the employee is promoted or redeployed by the Company.

Implementation Timeframe:

By January 1, 2016 and ongoing as applicable.

Design of Public Spaces

Enterprise Holdings shall incorporate accessibility into public spaces on its premises that are newly constructed or redeveloped on and after **January 1, 2017**:

- **Enterprise Holdings** will ensure that the Company follows the existing requirements outlined in the Design of Public Spaces Standards (Accessibility Standards for the Built Environment) under the *IASR* for outdoor public use.

- **Enterprise Holdings** will provide maintenance and restoration of Company owned public spaces by ensuring procedures are in place for preventative and emergency maintenance of accessible elements in public spaces and that procedures are in place for dealing with temporary disruptions when accessible elements required under this section are not in working order.

Public spaces at **Enterprise Holdings** include:

- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps and accessible pedestrian signals;
- Accessible off street parking; and,
- Service-related elements like service counters, fixed queuing lines and waiting areas.

Implementation Timeframe:

By January 1, 2017 and ongoing as applicable.

Service Disruptions

Enterprise Holdings has put procedures in place to prevent service disruptions, including to the accessible parts of its public spaces.

In the event of a service disruption, **Enterprise Holdings** will notify the public of the service disruption. **Enterprise Holdings** will ensure that any notice to the public includes the reason for the disruption, its anticipated duration and any alternative facilities or services that are available. The Company will also prepare a document setting out the steps to be taken in connection with a temporary disruption and, upon request, provide a copy of that document. Notification to the public of the availability of this document, upon request, will also occur.

Implementation Timeframe:

Effective immediately and ongoing as applicable.

Policy Review

The Multi-Year Accessibility Plan is a tool for **Enterprise Holdings** to communicate its accessibility initiatives internally and to the public. **Enterprise Holdings** will update and review this Plan at least once every five (5) years, and update it as appropriate. The Plan is next scheduled to be reviewed no later than **January 1, 2024**.

Implementation Timeframe:

By January 1, 2024 and ongoing as applicable.

For more information

For more information on this accessibility plan, please contact the Chief Accessibility Officer at:

Telephone: (416) 679-7481

Email: chiefaccessibilityofficer@ehi.com

Please note accessible formats of this Accessibility Policy and Multi-Year Accessibility Plan are available free upon request. We will consult with customers with disabilities making the request to determine the suitability of an accessible format or communication support provided.