



Accessibility Policy

Centurion Accessibility Plan and Policies

The Accessibility Plan applies to all the companies, entities, and limited partnerships under the Centurion umbrella, including but not limited to Centurion Apartment Real Estate Investment Trust (“REIT”), Centurion Property Associates Inc. (“CPAI”), Centurion Asset Management Inc. (“CAMI”), and Centurion Financial Trust (“CFiT”). A complete list of all applicable companies, entities and limited partnerships covered by this Plan is available upon request.

Statement of Commitment

Centurion is committed to meeting its obligations under the Accessibility for Ontarians with Disabilities Act (the “AODA” or the “Act”) and the related Integrated Accessibility Standards Regulations (the “IASR”). Building on Centurion’s Accessibility Customer Service Policy, Centurion is committed to ensuring equal access and participation for people with disabilities. Centurion is committed to treating all people in a way that allows them to maintain their dignity and independence as we believe in integration and equal opportunity. Centurion is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility.

Centurion understands that obligations under the Act do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law. Centurion is committed to Excellence in serving and providing goods, services, or facilities to all customers including those with disabilities. Centurion ensures that our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for individuals with disabilities.

Assistive Devices

Individuals with disabilities may use their personal assistive devices when accessing Centurion’s goods, services and/or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern, or may not be permitted for other reasons, Centurion will consult with the individual to utilize other measures to ensure that the person with a disability can access our goods, services and/or facilities.

We ensure that during an Employee’s onboarding experience, they are made familiar with any assistive devices that we have available on site that may be used by individuals with disabilities while accessing our goods, services and/or facilities.

Accessible Emergency Information

Centurion is committed to providing the customers and clients with publicly available emergency information in an accessible way upon request. We also provide Employees with disabilities with individualized emergency response information when necessary.

Training

Centurion provides training related to Employees, Investors and Residents with disabilities and the AODA to all Employees in Ontario within thirty (30) days of hire. Revised training will be provided in the event of any changes to legislation, procedures, policies, and/or practices.

Centurion provides Employees with access to the Absorb Learning Management System to complete the Disabilities in the Workplace training module. The training that Centurion provides highlights all areas that are covered in this policy and that are required by the AODA, including but not limited to the following:

- How to interact and communicate with persons with various types of disability;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability; and
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services, or facilities.

Centurion also provides additional training to Employees on accessibility as it relates to their specific roles such as training on our policies related to customer service standards and alternate ways to provide customer service to those individuals with disabilities.

Training will be provided in a way that best suits the needs of Employees.

Information and Communications

Centurion is committed to meeting the communication needs of people with disabilities. We consult with individuals with disabilities to determine their information and communication needs and adapt our services to best accommodate all requests made. When requested, Centurion will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports in a timely manner that takes into account the individuals accessibility needs and at a cost that is no more than the regular cost charged to other persons.

Centurion will consult with the individual making the request in determining the suitability of an accessible format and/or communication support. Should Centurion determine that information and/or communications are unconvertible, Centurion shall provide the requestor with an explanation as to why the information and/or communications are unconvertible and a summary of the unconvertible information and/or communications.

Centurion notifies the public about the availability of accessible formats and communication supports by posting a statement on its website and all public job postings.

The Use of Service Animals

When accompanied by a service animal, the Employee, Investor or Resident will be allowed to access Centurion's premises and no fee will be charged. Centurion understands that any "no pet" policy does not apply to the use of service animals. The owner of the service animal will be responsible for the care and control of the animal at all times when on Centurion's premises and Centurion reserves the right to request documentation (template, letter, or form) from a regulated health professional that confirms that the Employee, Investor or Resident needs the service animal for reasons related to a disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or vest, or when it helps the individual perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario

- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will explain why the animal is excluded and discuss with the individual another way of providing our goods, services and/or facilities to them.

The Use of Support Persons

If an Employee, Investor or Resident with a disability is accompanied by a support person, Centurion will ensure that both persons are allowed to enter the premises together and that the Employee, Investor or Resident is not prevented from having access to the support person at any time.

Feedback

Centurion provides its Employees, Investors and Residents with the ability to provide feedback on the services Centurion provides, including the services and accommodations provided to those persons with disabilities. Employees, Investors and Residents are able to provide feedback by phone at 1-888-236-7767 or by visiting our websites at: <https://www.cpliving.com/contact> and <https://centurion.ca/contact-us>. Centurion will supply alternative accessible methods of providing feedback such as in person, by phone, email or regular mail upon request. If an Employee, Investor or Resident wishes to provide feedback on site or in person, the feedback should be provided to a Centurion Management Employee.

Employees, Investors and Residents who provide formal feedback will receive acknowledgement of their feedback and a description of any actions taken as a result of their concern or complaint within one (1) calendar month.

Notice of Availability of Documents

Centurion notifies Employees, Investors and Residents that any documents related to the Customer Service Standards and AODA are available upon request and in alternative forms if needed. Notification is provided by including this information in Centurion's Employee Handbook, posting the information on Centurion's website, as well as on all job postings that are displayed on Centurion's website and/or any other job board. Centurion will consult with the individual making the request to determine the suitability of the format and/or communication support, and will provide the accessible format in a timely manner and, at no additional cost to the individual.

Accessible Websites and Web Content

Centurion's websites and content on such websites conform with World Wide Web Consortium Web Content Availability Guidelines (WCAG) 2.0 Level AA.

Feedback, Accessible Formats and Communication Supports

- Centurion has a statement on its websites (www.cpliving.com and www.centurion.ca) about the availability of accessible formats and communication supports and, upon request, provides or arranges for the provision of accessible formats in a timely manner; and
- Centurion ensures that the processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.

Notice of Temporary Disruption

In the event of any planned or unexpected temporary disruptions to facilities or services that Employees, Investors or Residents with disabilities rely on to access or use Centurion services or facilities, Centurion will ensure that Employees, Investors and/or Residents are notified promptly.

In the event that a notification needs to be posted, Centurion will post the notice on-site in a conspicuous location, as well as on our website and online Resident portal. The notice will include the following information:

- Services or facilities that are disrupted or unavailable;
- Alternative services, facilities if applicable; and
- The length of time the disruption is expected to last.

Employment

Centurion is committed to fair and accessible employment practices. We take the following steps to notify the public and Employees that, when requested, Centurion will accommodate people with disabilities during the recruitment and assessment processes and when individuals are hired:

- On its websites and on job postings, Centurion specifies that accommodations are available for applicants with disabilities;
- Informs applicants selected to participate in an assessment or selection process that accommodations are available during the recruitment process, upon request, in relation to materials and processes to be used;
- Upon request, consults with the applicant and arranges for suitable accommodation; and
- Notifies the successful applicant, when making offers of employment, of its policies for accommodating Employees with disabilities.
- Informs Employees and new hires as soon as practical of Centurion's policies to support Employees with disabilities and keeps Employees up to date on changes to these policies; and
- Upon request from an Employee with a disability, and further to consultation with the Employee, provides for suitable accessible formats and communication supports for information needed by the Employee to perform their job, and information that is generally available to Employees.

We have taken the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for Employees that have been absent due to a disability:

- Developed a written process for the development of individual accommodation plans; and
- Developed and documented a return to work process for Employees who have been absent due to a disability; the process outlines the steps Centurion will take to facilitate the Employee's return to work, using the Employee's individual accommodation plan as part of that process.

Centurion takes the following steps to ensure the accessibility needs of Employees with disabilities are taken into account during Centurion's Assessment Performance Incentive Program ("APIP") process:

- Centurion takes into account the accessibility needs of Employees with disabilities and any individual accommodation plans that are in place when utilizing Centurion's performance management processes, considering career development and advancement opportunities, and redeployment of its Employees with disabilities.

When needed, Centurion will also provide customized emergency information to assist an Employee with a disability during an emergency. With the Employee's consent, we will provide workplace emergency information to a designated person who will provide assistance to that Employee during an emergency. Centurion will provide the information as soon as practicable after becoming aware of the need for accommodation due to the Employee's disability and will review the individualized workplace emergency response information when the Employee moves to a different working location, when the Employee's overall accommodations needs and/or plans are reviewed, and when Centurion reviews its general emergency response policies.

Self-Service Kiosks

Centurion will ensure that all self-service kiosks for providing access to services have the necessary features in order to be accessible to those with disabilities.

Design of Public Spaces

Centurion will meet the accessibility standards for the design of public spaces when constructing and/or redeveloping applicable public spaces. Centurion will ensure that, from January 1, 2017, any public spaces including service counters and off-street parking that it constructs or redevelops, meet the requirements as required in the Integrated Accessibility Standards Regulation (ON 191/11). We will ensure that these legal provisions are met on sites that are occupied by Centurion and sites or properties that it manages, owns and operates to ensure that contractors performing such construction or redevelopment adhere to these requirements. This includes and is not limited to:

Off-Street Parking

- New off-street parking should and will have the required Type A (minimum 3400 mm wide); and
- Type B (minimum 2400 mm wide) parking spots along with access aisle (minimum 1500 mm wide) and the required signage.

Service Counters

- New service counters should and will have sufficient height (between 680-865mm) and depth of at least 250mm below the service counter to allow people who use wheelchairs from a seated position to approach and use the counter. If more than one service counter is available, a sign will be posted denoting accessible service counter.

Changes to Existing Policies

Centurion will review all policies and those that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for individuals with disabilities will be modified or removed.

Centurion will continue to review legislative requirements in regard to the Accessibility for Ontarians with Disabilities Act, to ensure continued compliance as new requirements are introduced.

For More Information

For more information on this accessibility plan and Centurion's Accessible Customer Service Policy, please contact:

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Alternate and accessible formats of all documents found on our websites are available upon request by contacting Centurion by phone at 1-888-236-7767 or by visiting our websites at: <https://www.cpliving.com/contact> and <https://centurion.ca/contact-us>