

Brookfield Properties

Accessibility Policy

Business Owner: Kristina Schwartz, SVP, Operations & Sustainability

1. SCOPE

This Accessibility Policy applies to all employees of Brookfield Properties (Brookfield) who work in Ontario.

2. PURPOSE

This policy serves to communicate and establish Brookfield Properties' commitment to accessibility under the AODA, and is intended to benefit persons with disabilities as defined in the *Human Rights Code* and the AODA.

3. POLICY

Brookfield Properties is committed to the removal and prevention of barriers to accessibility, and to meeting the accessibility needs of its employees, tenants, customers, members of the public, and other third parties who have disabilities, in a timely manner. In keeping this commitment, Brookfield Properties will meet or exceed the applicable requirements of accessibility legislation, including Ontario's *Accessibility for Ontarians with Disabilities Act (AODA)*, and related regulations.

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* ("the AODA") is to establish accessibility standards for persons with disabilities with respect to the provision of goods, services, facilities, information and communication, employment, buildings, structures, and premises.

Brookfield Properties will follow the procedures established in our accessibility policies listed below to provide accessible customer service, information and communications, employment practices, and public spaces to all employees, tenants, visitors to our properties, and the general public.

- Brookfield Properties Accessibility Policy & Multi-Year Accessibility Plan
- Customer Service Accessibility Standard Policy
- Design of Public Spaces Standard Policy

As a further commitment to accessibility, Brookfield Properties will conduct an annual review of our accessibility policies and require action items owners to sign off on the Brookfield Properties Accessibility Policy and Multi-Year Accessibility Plan. A copy of the annual review will be made available to all Brookfield Properties employees via the Brookfield Properties Intranet, and to the general public upon request.

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4. RESPONSIBILITIES

The following responsibilities have been prepared to assist Brookfield Properties team members in understanding their role in the implementation of the Brookfield Properties Accessibility policy.

SVP, Operations & Sustainability (Policy Owner)

- a) When required, provide information, instruction, support and assistance to all staff to ensure full understanding of the Policy at all our properties.
- b) Review the Policy yearly to ensure continuous compliance with the Accessibility for Ontarians with Disabilities Act and update as per any changes in legislation.

SVP, Human Resources

- a) Provide proper information on the Accessibility for Ontarians with Disabilities Act and its associated regulations and standards to all management and new staff.
- b) Ensure that the applicable training for new front line staff is scheduled and provided.
- c) Ensure the Employment Standards under the AODA are implemented.

VP, Construction Services

- a) Ensure the Built Environment / Design of Public Spaces Standard under the AODA is adhered to where required.

Director, Security & Life Safety

- a) Ensure the emergency procedures, plans, response and any related information under the AODA's Customer Service Standard and Integrated Accessibility Standard are implemented.

General Manager, or Property Designate

- a) Provide information, instruction, support and assistance to all applicable staff to ensure full application of the Brookfield Properties Accessibility Policy and Customer Service Accessibility Standard Policy at all our properties.
- b) Ensure properties are fully accessible with regards to provision of customer service as outlined in the Accessibility for Ontarians with Disabilities Act.
- c) Ensure training of new staff is conducted and educational programs for management provided when needed to maintain understanding of the AODA, our Brookfield Properties Accessibility Policy and our Customer Service Accessibility Standard Policy.

Designated Manager/Supervisor

- a) Understand, communicate and enforce the Brookfield Properties Accessibility Policy, Customer Service Accessibility Standard Policy, procedures, and applicable legislation.
- b) Ensure that contractors employed by the company adhere to the Policy and have all required training documentation for their employees readily available.

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- c) Address all feedback relating to accessibility and, where possible to do so, take immediate corrective action for resolution of issues relating to accessibility.
- d) Record each specific incident and the corrective action taken.
- e) When requested to do so by a government officer, provide any records upon request which demonstrate compliance (i.e. customer complaints and corrective action taken, etc.)

All Employees

- a) Attend applicable training sessions.
- b) Understand and comply with the applicable requirements of the Customer Service Accessibility Standard Policy.
- c) Understand and comply with all applicable requirements of the AODA and its standards and regulations.

5. PROCEDURES

Implement the actions and policies outlined below in the Brookfield Properties Multi-Year Accessibility Plan:

Brookfield Properties Multi-Year Accessibility Plan

2012

Year	Standard	Requirement	Actions	Owner
2012	Customer Service	Develop accessible customer service policies, practices and procedures (s.3)	<ul style="list-style-type: none"> • Brookfield Properties AODA Customer Service policy developed and implemented in 2011. 	SVP, Operations & Sustainability
2012	Customer Service	Give notice of temporary disruption in service, reason for disruption, expected duration and any available alternatives (s.5)	<ul style="list-style-type: none"> • All Brookfield Properties locations were advised to adhere to this policy • Brookfield Properties has developed poster templates for temporary service disruptions. 	SVP, Operations & Sustainability
2012	Customer Service	Train employees who interact with the public or other third parties on your behalf and employees who are involved in developing policies, practices and procedures (s.6)	<ul style="list-style-type: none"> • All Brookfield Properties employees trained in 2011-2012. 	SVP, Human Resources
2012	Customer Service	Develop a process for feedback on how goods or services are provided to people with disabilities. Make information about the process readily available to the public. (s.7)	<ul style="list-style-type: none"> • Accessibility feedback process developed and implemented in 2011. • AODA section added to the website, including accessible floor plans and customer feedback form. • Generic email address established for external feedback. 	SVP, Operations & Sustainability
2012	Customer Service	File an accessibility report with the Government of Ontario to document compliance (s.11)	<ul style="list-style-type: none"> • Customer service accessibility compliance report filed with the Government of Ontario online in September 2012. 	SVP, Operations & Sustainability
2012	IASR - Employment	Provide individualized workplace emergency response information to employees who have a disability, if the	<ul style="list-style-type: none"> • Security creates individual response plans for persons identified through HR. 	Director, Security & Life Safety

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Brookfield Properties Multi-Year Accessibility Plan

Year	Standard	Requirement	Actions	Owner
		disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability (s. 27)	<ul style="list-style-type: none"> Procedures depend on the nature of the disability and specifics of the work environment. 	SVP, Human Resources
2012	IASR - Information & Communications	Make emergency procedures, plans or public safety information available in an accessible format or with appropriate communication supports, upon request. (s.13)	<ul style="list-style-type: none"> Emergency procedures are made available in a variety of formats including audio and visual. Upon request, security teams will work to address any concerns and provide information in other formats including personal training sessions on request. 	Director, Security & Life Safety

2014

Year	Standard	Requirement	Actions	Owner
2014	IASR	Develop IASR accessibility policy (s.3)	<ul style="list-style-type: none"> Revised existing AODA policy to encompass both the Customer Service standard and the IASR 	SVP, Operations & Sustainability
2014	IASR	Develop multi-year accessibility plan (s.4)	<ul style="list-style-type: none"> Multi-year accessibility plan that incorporates all AODA requirements has been developed. 	SVP, Operations & Sustainability
2014	IASR	Incorporate accessibility features when designing, procuring, or acquiring self-service kiosks. (s.6)	<ul style="list-style-type: none"> Memo issued to all properties advising of the compliance requirement and best practices for kiosk design Memo issued to our kiosk suppliers advising of this requirement Accessibility options must be presented for all new kiosk proposals 	SVP, Operations & Sustainability

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Year	Standard	Requirement	Actions	Owner
2014	IASR – Information & Communications	Make NEW internet websites and web content conform with the Web Content Accessibility Guidelines (WCAG) 2.0, at Level A (s.14)	<ul style="list-style-type: none"> Website audit conducted - engaged Accessibility Advantage to perform an audit of the Brookfield Properties website Audit action plan developed for all items identified Investigation of high priority website audit report recommendations Audit report provided to external website design company for consideration. 	SVP, Operations & Sustainability
2014	IASR	File an IASR accessibility report with the Government of Ontario every 3 years to document compliance (s.86)	<ul style="list-style-type: none"> IASR compliance report filed online in October 2014. 	SVP, Operations & Sustainability

2015

Year	Standard	Requirement	Actions	Owner
2015	IASR – Built Environment	Ontario Building Code contains updated accessibility requirements for new construction and renovations.	<ul style="list-style-type: none"> Brookfield Properties has met with a consultant (Accessibility Advantage) to review upcoming requirements and will ensure that our consultants adhere to the new standards where required. All Construction Project Managers have been trained. Detailed property audits have been conducted and high priority items identified for future consideration. 	VP, Construction Services

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Year	Standard	Requirement	Actions	Owner
2015	IASR	Train employees on the requirements of the IASR standard and on the Human Rights Code (s.7)	<ul style="list-style-type: none"> Brookfield Properties has taken the following steps to ensure employees were provided with the training needed to meet Ontario's accessible laws by January 1, 2015: <ul style="list-style-type: none"> Instructor led training provided for all employees by October 2015 All new hires are trained as part of employee orientation processes Training recording including summary spreadsheet/sign-in sheets is available upon request 	SVP, Human Resources
2015	IASR – Information & Communications	Have an accessible process in place for receiving and responding to feedback (s.11)	<ul style="list-style-type: none"> Upon request, we review the feedback process in question, identify alternate accessible formats and consult with the person who made the request in selecting a suitable accessible format 	SVP, Operations & Sustainability

2016

Year	Standard	Requirement	Actions	Owner
2016	IASR – Employment	General Recruitment: notify employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process. (s.22)	<ul style="list-style-type: none"> Brookfield Properties is committed to fair and accessible employment practices. When requested, Brookfield Properties will accommodate people with disabilities during the recruitment and assessment processes and when people are hired by: <ul style="list-style-type: none"> Providing accessibility statements on all job postings 	SVP, Human Resources

Brookfield Properties Multi-Year Accessibility Plan

Year	Standard	Requirement	Actions	Owner
			<ul style="list-style-type: none"> ○ Including accessibility statements in our Recruitment and Selection Policy 	
2016	IASR – Employment	<p>Recruitment, assessment and selection process: notify job applicants, when they are individually selected to participate in an assessment or selection process, which accommodations are available upon request in relation to the materials or processes to be used.</p> <p>If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability. (s.23)</p>	<ul style="list-style-type: none"> • Brookfield Properties is committed to fair and accessible employment practices. • When requested, Brookfield Properties will accommodate people with disabilities during the recruitment and assessment processes and when people are hired by: <ul style="list-style-type: none"> ○ Ensuring that all individuals responsible for recruiting advise all applicants over the phone or through email that accommodations are available upon request ○ Consulting and providing the applicant accommodation that takes into account their disability needs. 	SVP, Human Resources
2016	IASR – Employment	<p>Notice to Successful Applicants: when making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities. (s.24)</p>	<ul style="list-style-type: none"> • We include Brookfield Properties’ AODA policy regarding accommodation as part of our critical policies that all new employees sign off on as part of their offer packages. 	SVP, Human Resources
2016	IASR – Employment	<p>Informing employees of supports: inform employees of policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations.</p>	<ul style="list-style-type: none"> • Brookfield Properties’ AODA policy addresses the Company’s commitment and practices (i.e., job accommodation) in supporting employees with disabilities. 	SVP, Human Resources

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Year	Standard	Requirement	Actions	Owner
		Information should be provided: - as soon as practicable after they begin their employment. - whenever there is a change to existing policies on the provision of job accommodations (s.25)	<ul style="list-style-type: none"> • This policy is distributed organizationally through communication and posting on Company intranet. • Brookfield Properties communicates all changes to existing policies through internal communication channels including posting on the Company intranet. 	
2016	IASR – Employment	In addition to the obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: - Information that is needed in order to perform the employee’s job; and - Information that is generally available to employees in the workplace (s.26)	<ul style="list-style-type: none"> • Brookfield Properties has a Request for Workplace Accommodation Form and Human Resources follows the Workplace Accommodation Policy which includes meeting with any employee requesting accessible formats and communication supports to ensure they receive job specific information and information that is generally available to employees in the workplace. 	SVP, Human Resources
2016	IASR – Employment	Documented Individual Accommodation Plans: develop a written process for the development of documented individual accommodation plans for employees with disabilities. (s.28)	<ul style="list-style-type: none"> • Brookfield Properties consults with employee and has a written process for the development of documented individual accommodation plans for employees with disabilities and follow the requirement as described in Section 28.2 and Section 28.3. 	SVP, Human Resources
2016	IASR – Employment	Return to Work Process: develop, document and have in place a return to work process for employees absent due to	<ul style="list-style-type: none"> • Brookfield Properties takes the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work 	SVP, Human Resources

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Year	Standard	Requirement	Actions	Owner
		disability who require a disability-related accommodation to return to work. (s.29)	<p>policies for employees that have been absent due to a disability:</p> <ul style="list-style-type: none"> ○ Brookfield Properties will develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and shall document the process. ○ Brookfield Properties shall also address the requirements under Section 29.2 and 29.3 when developing the return to work process. 	
2016	IASR – Employment	For performance management, career development and staff redeployment consider the accessibility needs and individual accommodation plans in the overall process (s.30-32)	<ul style="list-style-type: none"> ● Brookfield Properties takes the following steps to ensure the accessibility needs of employees with disabilities needs are taken into account if Brookfield Properties is using performance management, career development and redeployment processes: <ul style="list-style-type: none"> ○ Upon request, Brookfield Properties reviews and provides all information/documents and processes related to performance management to ensure the accessibility needs of employees with disabilities, as well as individual accommodation plans, when 	SVP, Human Resources

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Year	Standard	Requirement	Actions	Owner
			<p>using its performance management process in respect of employees with disabilities are being met.</p> <ul style="list-style-type: none"> ○ When applying/implementing any career development/advancement strategies, Brookfield Properties takes into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. ○ In the event that redeployment is used, Brookfield Properties takes into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. 	
2016	IASR – Information & Communications	Provide or arrange for the provision of accessible formats and communications supports, upon request. (s.12)	<ul style="list-style-type: none"> • Brookfield Properties ensures all publicly available information is made accessible upon request. • Brookfield Properties has sourced accessible format vendors and developed accessibility guidelines for documents produced in-house. 	SVP, Operations & Sustainability

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Year	Standard	Requirement	Actions	Owner
2016	IASR – Information & Communications	Notify the public about the availability of accessible formats and communication support. (s.12)	<ul style="list-style-type: none"> Brookfield Properties notifies the public via our website about the availability of accessible formats and communication support. 	SVP, Operations & Sustainability

2017

Year	Standard	Requirement	Actions	Owner
2017	IASR – Built Environment / Design of Public Spaces	<p>Meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:</p> <ul style="list-style-type: none"> - Recreational trails/beach access routes - Outdoor public eating areas like rest stops or picnic areas - Outdoor play spaces, like playgrounds in provincial parks and local communities - Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals - Accessible off street parking - Service-related elements like service counters, fixed queuing lines and waiting areas (s.80) 	<ul style="list-style-type: none"> Brookfield Properties meets the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include: <ul style="list-style-type: none"> o Recreational trails/beach access routes o Outdoor public eating areas like rest stops or picnic areas o Outdoor play spaces, like playgrounds in provincial parks and local communities o Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals o Accessible off street parking o Service-related elements like service counters, fixed queuing lines and waiting areas 	VP, Construction Services

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2021

Year	Standard	Requirement	Actions	Owner
2021	IASR – Information & Communications	ALL internet websites and web content must conform with WCAG 2.0 Level AA with exceptions (s. 14): - Live Captions - Audio Descriptions	<ul style="list-style-type: none"> • Provided compliance requirements to external web design team for implementation 	SVP, Operations & Sustainability

For More Information	For more information on this accessibility plan, please contact Brookfield Properties at: <ul style="list-style-type: none"> • Phone: N/A • Email: accessibility@brookfield.com
For Accessible Formats	Accessible formats of this document are available free upon request from: accessibility@brookfield.com

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6. RELATED FORMS & POLICIES

- Brookfield Properties Accessibility Policy Statement Sign Off
- Customer Service Accessibility Standard Policy
- Design of Public Spaces Standard Policy
- Accessibility Policy
- Accessibility Feedback Form
- Accessibility Corrective Action Form
- Sample multi-year accessibility plan template:
http://www.mcass.gov.on.ca/en/mcass/publications/accessON/policies_over50/appendix_a.a.spx

7. LEGISLATION

Province	Relevant Legislation
Ontario	Accessibility for Ontarians with Disabilities Act, 2005, SO 2005, c 11 Accessibility Standards for Customer Service, O Reg 429/07 Integrated Accessibility Standards, O Reg 191/11

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Brookfield Accessibility Policy Statement

January 2024

At Brookfield Properties, we expect everyone to be treated with courtesy, made to feel welcome, and have their need for accommodation, if any, respected.

Brookfield Properties is committed to the removal and prevention of barriers to accessibility, and to meeting the accessibility needs of its employees, tenants, customers, members of the public, and other third parties who have disabilities, in a timely manner. In keeping this commitment, Brookfield Properties will meet or exceed the applicable requirements of accessibility legislation, including Ontario's *Accessibility for Ontarians with Disabilities Act (AODA)*, and related regulations.

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Senior Vice President, Human Resources

Senior Vice President, Operations & Sustainability

Vice President, Construction Services

Director, Security & Life Safety

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Appendix A: Accessible Format Guidelines for Brookfield Documents

Upon request, Brookfield Properties will follow the guideline below to ensure publicly available information is made accessible.

1. Identify an appropriate accessible or alternate format – work with the requestor to identify an appropriate means of communicating the information (i.e. braille, large format, sharing the information verbally, etc.).
2. Consult vendor list and obtain quotes – if an alternate version is required, the vendor list below may provide a useful starting point for obtaining multiple quotes.
3. Establish and communicate a time frame to the requestor – once a format and vendor have been selected, ensure to communicate an estimated date of delivery to the requestor.
4. Provide accessible format document to requestor

Accessible Format Vendors

Vendor Name	Description
Accessibil-IT	Converts your PDFs into accessible versions for people who have visual or cognitive disabilities https://www.accessibilit.com/
All Languages Limited	Offers limited ASL interpreting services (not all interpreters are certified) https://www.alllanguages.com/
Canadian Association of Sign Language Interpreters (CASLI)	The only certifying body for ASL Interpreters in Canada https://www.casli.ca/
Canadian Hearing Services (CHS)	Can provide an initial assessment, help you select communications devices, set up a digital media captioning service or provide any custom accessibility advice, service or audit, custom fit to organizations or individual needs. https://www.chs.ca/page/accessibility-services
Centre for Equitable Library Access (CELA)	Public library services for Canadians with print disabilities, provides an overview of accessible reading formats https://celalibrary.ca/help/accessible-formats
T-Base Communications	Produces braille and large print as options alongside other accessible online offerings such as accessible PDF and web accessibility (located in Ottawa, but can serve all Canadian locations) http://tbase.com/
Braille It (Calgary)	Braille printing services for business cards, documents, etc. http://www.brailleit.ca/braille_it
Accessible Printing (Toronto)	Braille transcription for documents, business cards, reports, invoices http://www.accessibleprinting.com/
Crawford Tech (Toronto)	Document accessibility services, braille, large print and accessible PDF http://www.crawfordtech.com/