

## **Commitment Statement & Purpose**

Genesco is committed to identifying and meeting the accessibility needs of persons with disabilities in an effective, appropriate and timely manner through compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and the *Human Rights Code* (Ontario) (“Code”).

Genesco is committed to developing an inclusive, barrier-free environment that is guided by the principles of the AODA, including the Customer Service Standards and the Integrated Accessibility Standards, which include dignity, independence, integration (except when alternate measures are necessary to meet the needs of people with disabilities) and equal opportunity.

The purpose of this Policy is to set out the principles that guide Genesco on our path to accessibility for persons with disabilities through compliance with the AODA and the Code.

## **Application and Scope**

This Policy applies to all Ontario-based Genesco employees (including persons who participate in developing Genesco’s policies), volunteers and persons who provide goods, services, or facilities on behalf of Genesco in Ontario and/or at our premises in Ontario.

## **Definitions**

Terms set out in this Policy shall have the defined meaning set out in the AODA.

## **Requirements**

### **1. Accessibility Policy & Commitment Statement**

Genesco will maintain this Policy to describe the principles that guide our path to accessibility as an organization and identify what Genesco will do to meet the requirements of the AODA. This Policy is posted on our website. Upon request, Genesco will provide a copy of this Policy in an accessible format.

### **2. Multi-Year Accessibility Plan**

Genesco has developed and will maintain a Multi-Year Accessibility Plan (the “Plan”) that outlines Genesco’s strategy to prevent and remove barriers from our workplace and meet its requirements under the Integrated Accessibility Standards. The Plan will be reviewed and updated at least once every five years. The Plan is posted on our website. Upon request, Genesco will provide a copy of the Plan in an accessible format.

### **3. Provision of Service to Persons with Disabilities**

Genesco will provide its services and communicate with customers, members of the public and applicable third parties to whom we provide goods and services in Ontario, including at our Ontario premises, in a manner that takes into account a person's disability and is compliant with the AODA.

Genesco is committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our Ontario premises that are open to the public and other applicable third parties, to the extent permitted by law. Genesco will ensure that all employees and others who deal with the public and applicable third parties at Genesco's Ontario premises are properly trained in how to interact with persons with disabilities who are accompanied by a service animal. Genesco is also committed to providing access to the parts of its premises that are open to the public and other applicable third parties to the support persons of persons with disabilities.

Persons with disabilities will be permitted to obtain, use or benefit from Genesco's services through the use of their own assistive devices. It is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

#### **4. Notice of Temporary Disruption**

Genesco will provide appropriate parties with notice in the event of a planned or unexpected disruption in services provided by Genesco which are usually used by persons with disabilities, if any. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

#### **5. Self-Service Kiosks**

Although Genesco currently does not use self-service kiosks, we will have regard to the accessibility for persons with disabilities should we design, procure or acquire self-service kiosks in Ontario by considering what accessibility features could be built into kiosks to best meet the needs of our customers and clients.

#### **6. Training**

Genesco will provide training to:

- all of our Ontario-based employees and volunteers,
- all persons who participate in developing Genesco's policies applicable in Ontario,
- and all other persons who provide goods, services or facilities on behalf of Genesco in Ontario,

on the requirements of the accessibility standards referred to in the Integrated Accessibility Standards and the Customer Service Standard, and on the Code as it pertains to persons with disabilities. Training will be provided as soon as practicable. Training will also be included as part of orientation for all new hires. The training provided will take into consideration and be appropriate to the duties of those receiving the training. Genesco will also provide training, on an ongoing basis, with respect to changes made to this Policy, if any.

Records of the training provided will be maintained and will include: (i) the dates on which training was provided and (ii) the number of individuals to whom training is provided.

Where third parties are engaged to perform services in Ontario on behalf of Genesco, we may require that such third parties provide an acknowledgment that their principals, employees, agents and volunteers receive any applicable training required by the AODA.

## **7. Information and Communications**

### ***Feedback:***

Genesco is committed to establishing and maintaining a process for receiving and responding to feedback about accessibility for persons with disabilities in Ontario. Feedback regarding accessibility issues can be made to Genesco by sending an email to [accommodation@genesco.com](mailto:accommodation@genesco.com). Inquiries will be addressed as soon as practicable after receipt.

Genesco will continue to ensure that our 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.

### ***Accessible formats and communication supports:***

Upon request, Genesco will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, including employees, in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons. Genesco will consult with the person making the request for an accessible format or communication support when determining the suitability of an accessible format or communication support. Genesco will continue to advise the public about the availability of accessible formats and communication supports with respect to its feedback processes through a notification on our company website.

### ***Accessible websites and web content:***

Genesco will ensure that any websites that our Ontario entity controls directly or through a contractual relationship that allows the Ontario entity to modify the content, including web content, on such sites, conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, except where meeting the requirement(s) is not practicable.

### ***Emergency Procedure, Plans, or Public Safety Information:***

Genesco does not currently have emergency response procedures, plans and public safety information that it makes available to the public in Ontario. In the event that we do make such information available in the future, Genesco will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons. Genesco will consult with the person making the request when determining the suitability of an accessible format or communication support.

## **8. Employment**

Genesco's policies and practices are intended to build an inclusive and accessible work environment that is free from discrimination and harassment.

### ***Recruitment and Hiring:***

In our recruitment processes, Genesco will advise our employees and the public about the availability of accommodation for applicants with disabilities. Genesco will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used and will work with the applicant to address any requests for accommodation up to the point of undue hardship.

### ***Informing Employees of Supports:***

We will notify our employees of Genesco's policies (and any updates to those policies) for supporting employees with disabilities, including our policies regarding the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new hires as soon as practicable after they commence employment.

### ***Workplace Emergency Response Information:***

Genesco will provide individualized workplace emergency response information to employees with disabilities where the disability is such that individualized information is necessary and Genesco is aware of the need for accommodation. Where an employee who receives individualized workplace emergency response information requires assistance, Genesco will designate a person to provide assistance and, with the employee's consent, Genesco will provide the workplace emergency response information to such person.

Genesco will review individualized workplace emergency response information, at minimum, whenever the employee moves to a different location within Genesco, the employee's overall accommodation needs or plans are reviewed, or Genesco reviews its general emergency response policies.

### ***Documented Individual Accommodation Plans:***

Genesco will develop and maintain a written process for the development of documented individual accommodation plans for employees with disabilities. If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans. Additionally, the plans will include individualized workplace emergency response information (where required). Plans will also identify any other accommodation that is to be provided.

### ***Return to Work Process:***

Genesco will develop and maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process will, as part of the process, outline the steps that Genesco will take to facilitate the return to work and will include documented individual accommodation plans. We note that this return to work process will not replace or override any other return to work process created by or under any other statute (for example, *the Workplace Safety Insurance Act, 1997*).

### ***Performance Management, Career Development and Advancement & Redeployment:***

Genesco will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.