

WILLIAMS-SONOMA, INC.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT – ACCESSIBILITY POLICY AND MULTI-YEAR ACCESSIBILITY PLAN

Part 1: Introduction

WSI's Commitment to an Inclusive and Accessible Work Environment

Williams-Sonoma Canada Inc. ("WSI") is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting 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 Integrated Accessibility Regulation (the "ISAR") of the Accessibility for Ontarians with Disabilities Act ("AODA").

WSI Inclusion & Diversity Vision

"We will create and nurture a global company culture where we confidently bring our authentic selves to work every day; where the only criteria for advancement are the quality of our work, the contributions we make to our teams and the business, and our ability to lead; and where our individual differences – whatever they may be – are valued, explored and appreciated."

WSI's Commitment to Accommodation

WSI is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause WSI undue hardship.

Part 2: Accessibility at Williams-Sonoma Canada Inc.

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations to ensure their workplaces and services are fully accessible to the public and employees, including persons with disabilities.

This Accessibility Policy and Multi-Year Accessibility Plan outlines the actions that WSI has and will put in place to improve opportunities for people with disabilities, and will be implemented in accordance with the time frames set out in the ISAR. In addition to this Accessibility Policy and Multi-Year Accessibility Plan, WSI also has a separate policy regarding accessible customer service.

The objective of the Accessibility Policy and Multi-Year Accessibility Plan is to support WSI's compliance with the AODA and the ISAR and WSI's commitment to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

Barrier Assessment

In accordance with the AODA and with WSI's commitment to treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for WSI's associates to develop to their full potential, our plan seeks to prevent and remove barriers to accessibility for persons with disabilities.

A "barrier" is anything that prevents a person with a disability from full participating in all aspects of society because of his or her disability. Typical barriers to accessibility encountered by persons with disabilities include Physical / Architectural, Attitudinal, Informational/Communication, Systemic, and Technological barriers.

Barrier Definitions:

1. **Physical/Architectural:** design elements of a building or a space that cause problems for persons with disabilities.
2. **Attitudinal:** our perceptions of, and how we interact with, persons with disabilities.
3. **Informational/Communication:** things/situations that make it difficult for a person with a disability to give, receive or understand information.
4. **Systemic:** organizational policies or practices that (often unwittingly) restrict the participation of persons with disabilities.
5. **Technological:** poor or inexistent technology system that can prevent people from accessing information. Common tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.

Part 3: WSI Accessibility Policy

Emergency Information and Procedures

WSI is committed to providing customers with publicly available emergency information in an accessible way upon request. We will also provide individualized workplace emergency response information to employees with disabilities if we are made aware of the need for accommodation.

Training

WSI has provided, and will continue to provide, training to employees, volunteers, and other staff members who provide goods, services or facilities on behalf of WSI, on the requirements set out in the IASR and on the Ontario *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the applicable staff.

Feedback Processes

WSI has taken, and will continue to take, reasonable steps to ensure that its existing feedback processes are accessible to people with disabilities upon request.

Accessible Formats

WSI is committed to meeting the communication needs of people with disabilities. We will take reasonable steps to ensure that all publicly available information controlled by WSI is provided in an accessible way upon request. WSI will also consult with the person making the request to determine his or her information and communication needs.

Employment

WSI is committed to fair and accessible employment practices. We will take reasonable steps to implement the following actions:

- WSI will notify the public and staff that, when requested, it will accommodate people with disabilities during the recruitment and assessment processes and when people are hired;
- WSI will develop and put in place a process for developing individual accommodation plans for employees with disabilities;
- WSI will develop and put in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and
- WSI will ensure the accessibility needs of employees with disabilities are taken into account if using performance management, career development and advancement, or redeployment processes.

WSI will also take reasonable steps to prevent and remove other accessibility barriers that are identified.

Design of Public Spaces

WSI will meet the Design of Public Spaces Standards when building or making major modifications to public spaces, including:

- Exterior paths of travel and related elements, like sidewalks, ramps, and stairs;
- Accessible off street parking; and
- Service-related elements, such as service counters, fixed queuing lines and waiting areas.

We will also put reasonable procedures in place to prevent service disruptions to accessible parts of these public spaces and to deal with temporary disruptions when accessible elements required under these Standards are not in working order. In the event of a service disruption, WSI will notify the public of the service disruption and alternatives available.

Part 4: WSI Multi-Year Accessibility Plan

Part I: General Requirements

INITIATIVE	ISAR REQUIREMENT	ACTION	STATUS	COMPLIANCE DATE
1.1 Establishment of Accessibility Policies	Every obligated organization shall develop, implement and maintain policies governing how the organization achieves	<ul style="list-style-type: none"> • Policy complete and posted on WSI internal intranet (Store Wide Web) 	Completed	January 1, 2014

	or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.			
1.2 Accessibility Plans	<p>Large organizations shall,</p> <p>(a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>(c) review and update the accessibility plan at least once every five years.</p>	<ul style="list-style-type: none"> • Understand requirements of the ISAR • Develop policies and procedures, multi-year accessibility plan with feedback from stakeholders • Attend AODA workshops • Develop AODA committee who will to meet until compliance deadlines have all been met 	Completed	January 1, 2014
1.3 Training	<p>Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<ul style="list-style-type: none"> • Develop training program to educate associates and managers on AODA legislation, ISAR and Human Rights Code and roll out to all WSI associates in Ontario • Assess training needs (e.g., separate training for managers and associate levels) • Determine vehicle to deliver training (e.g., online, in-person) • Training will be mandatory • Determine what accessible formats currently exist and what accessible functions may be incorporated in the training design • Determine mechanism for managing and tracking completion of training 	Completed (and ongoing)	January 1, 2015

Part II: Information and Communication Standards

INITIATIVE	ISAR REQUIREMENT	ACTION	STATUS	COMPLIANCE DATE
2.1 Feedback	Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	<ul style="list-style-type: none"> • Review/Update current process for requesting for accessible formats • Update current process for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual • Develop understanding of current accessible formats and information and communication and technology tools available at WSI to adequately respond to requests for accessible formats that take into consideration the requestor's disability needs 	Completed	January 1, 2015
2.2 Accessible Formats & Communication Supports	2.2.1 Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.	<ul style="list-style-type: none"> • Review accessible formats and communication, technology supports currently available at WSI • Review current process for requesting accessible formats and communication supports • As needed, update current process for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual 	Completed	January 1, 2016

		<ul style="list-style-type: none"> Develop communication strategy for educating WSI associates on the availability of and process for requesting accessible formats and communication supports 		
	2.2.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> Understand functionality of accessible formats and communication supports available to better consult on requests for accessible formats that take into account the individual's disability needs Develop a process for responding to, approving or declining a request 	Completed	January 1, 2016
	2.2.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> Incorporate language in marketing materials and website to advise that, in accordance with AODA, accessible format may be made available on request 	Completed	January 1, 2016

Part III: Employment Standard

INITIATIVE	ISAR REQUIREMENT	ACTION	STATUS	COMPLIANCE DATE
3.1 Recruitment, General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<ul style="list-style-type: none"> Review of all mechanisms for posting WSI positions (website, online, campus posting) Incorporate language on postings and WSI career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available 	Completed	January 1, 2016

3.2 Recruitment, Assessment or Selection Process	3.2.1 During the recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.	<ul style="list-style-type: none"> • Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request • Encourage and provide more diversity-related training to Talent Attraction on how to engage in conversations to solicit and handle accommodation requests, in accordance with AODA 	Completed	January 1, 2016
	3.2.2 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.	<ul style="list-style-type: none"> • Educate Talent Team on inclusive selection strategies developed by Ontario Human Rights Commission and on how to implement and request support for accommodation related requests, in accordance with AODA • Review of recruitment process to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA 		
3.3 Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities	<ul style="list-style-type: none"> • Incorporate in offer letter a section regarding WSI's accessibility policies and where to access additional information 	Completed	January 1, 2016
3.4 Informing Associates of Supports	3.4.1 Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of	<ul style="list-style-type: none"> • Develop change and communication strategy to educate and advise WSI associates on WSI's 	Completed	January 1, 2016

	job accommodations that take into account an employee's accessibility needs due to disability	accessibility policies, plan and processes		
	3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> • Accessibility policies and processes to be incorporated into onboarding process for Ontario 		
	3.4.3 Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	<ul style="list-style-type: none"> • Develop process and strategy to communicate any policy changes by email and posting on Intranet 		
3.5 Accessible Formats and Communication Supports for Associates	3.5.1 In addition to its 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, <ul style="list-style-type: none"> (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace. 	<ul style="list-style-type: none"> • Educate associates on the availability of accessible format and communication supports; in accordance with AODA • Educate associates on process for requesting accessible formats and communication supports • Review current ergonomic assessment process to identify gaps and implement improvements as necessary 	Completed	January 1, 2016
	3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> • Develop a process for consulting with associates to determine accommodation needs (educate managers to have conversations) • Develop a process for advising associate of solution 		
3.6 Workplace Emergency Response Information	3.6.1 Every employer shall provide individualized workplace emergency response information to employees who have a	<ul style="list-style-type: none"> • Established process to provide people in Ontario who request, or for whom WSI is aware of the need for 	Completed	January 1, 2012

	<p>disability, if the 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.</p>	<p>accommodation due to the employee's disability, to receive individualized workplace emergency response information</p>		
	<p>3.6.2 If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p>	<ul style="list-style-type: none"> • WSI process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the WSI person to share the information with those designated to provide assistance in the event of an emergency 		
	<p>3.6.3 Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p>	<ul style="list-style-type: none"> • Upon request, the General Manager will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible 		
	<p>3.6.4 Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<ul style="list-style-type: none"> • WSI process for creating Individualized Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs 		
<p>3.7 Documented Individual Accommodation Plans</p>	<p>3.7.1 Employers, other than employers that are small organizations, shall develop and have in place a written process for the development</p>	<ul style="list-style-type: none"> • Review of current accommodation processes and practices 	<p>Completed</p>	<p>January 1, 2016</p>

	<p>of documented individual accommodation plans for employees with disabilities.</p>	<ul style="list-style-type: none"> • Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA 		
	<p>3.7.2 The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and 	<ul style="list-style-type: none"> • Develop documented plans that will incorporate the following elements: • Manner in which employee can request • Under which circumstances medical is required • Who will be assessing the medical provided • Work with HR to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests • Accommodation Plans will incorporate confidentiality requirements and outline when, to whom and what information may be shared • Educate WSI associates and Managers on the Accessibility policies and processes and procedures for requesting individual plans • Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA 		

	<p>updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
3.8 Return to Work Process	<p>3.8.1 Every employer, other than an employer that is a small organization,</p> <p>(a) shall 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</p> <p>(b) shall document the process.</p>	<ul style="list-style-type: none"> • Liaise with HR and LOA team to conduct a review of the current return to work process • Update and document return to work process based on gaps and compliance requirements 	Completed	January 1, 2016
	<p>3.8.2 The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use documented individual accommodation plans, as part of the process.</p>			
	<p>3.8.3 The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>			

3.9 Performance Management	<p>An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<ul style="list-style-type: none"> • Assess current performance review processes to ensure accessibility features are incorporated (i.e., forms accessible, conversations in plain text). • Ensure updated/new performance management processes to be rolled out incorporate accessibility features • Ensure training or communications to performance managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation 	Completed	January 1, 2016
3.10 Career Development & Advancement	<p>An employer that provides career development and advancement to its employees shall take 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.</p>	<ul style="list-style-type: none"> • Review of current training and professional development materials to determine accessibility features • Ensure all future developed training and materials are developed with accessibility features in mind • Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA • Track career progression of individuals with disabilities 	Completed	January 1, 2016
3.11 Redeployment	<p>An employer that uses redeployment shall take into</p>	<ul style="list-style-type: none"> • Review and update of current transfer and 	Completed	January 1, 2016

	account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	redeployment practices and processes to ensure accommodation plans are referenced <ul style="list-style-type: none"> • Educate General Managers to ensure redeployment efforts/activities take into account the employee's accommodation needs 		
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Part 5: Closing Statements

In accordance with the AODA and with WSI's objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for WSI's associates to develop to their full potential, the Accessibility Policy and Multi-Year Accessibility plan is posted on WSI's internal website and will be reviewed and updated at least every 5 years.

For the public:

If you have any questions, or have feedback related to WSI's Accessibility Policy and Multi-Year Accessibility Plan, please contact Williams- Sonoma Inc.'s HR Hotline **1-855-654-6474**

For WSI associates:

If you have any questions, or have feedback related to WSI's Accessibility Policy and Multi-Year Accessibility plan, please contact the HR Hotline **1-855-654-6474** (or your HR representative).