



The Home Depot of Canada Inc.

Accessibility Policies

Contents

	Ontario
Accessibility Standards for Customer Service Policy	2
Integrated Accessibility Standards Policy	9
Multi-Year Accessibility Plan	14
	Manitoba
Accessibility Standards for Customer Service Policy.....	22



The Home Depot of Canada Inc.
ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY

1. INTRODUCTION

The *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) became law on June 13, 2005. Under this legislation, the government of Ontario is in the process of developing accessibility standards that identify, remove and prevent barriers for people with disabilities in key areas of daily living. These standards apply to private and public organizations across Ontario, including The Home Depot.

The goal of the Act is to create a more accessible Ontario, by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with disabilities.

The Accessible Customer Service Standard (the “Standard”) has been established under the Act to ensure goods and services are, where at all possible, equally accessible to every member of the public.

At The Home Depot Canada, we are committed to providing an environment that is, and feels, accessible for all people. In alignment with our core values of Respect for all People and Excellent Customer Service, we are committed to providing barrier-free, exceptional customer service to all, including persons with disabilities.

2. ASSOCIATES AFFECTED

This policy applies to all associates who deal with members of the public or third parties in Ontario.

This policy also applies to all persons responsible for the development, implementation, or oversight of The Home Depot Canada’s policies, practices and procedures.

3. DEFINITIONS

- i. **Disability** – Defined under the Act as:
 - any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing,

- includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- a condition of mental impairment or a developmental disability,
 - a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - a mental disorder, or
 - an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
- ii. **Assistive Device** – Any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living.
- iii. **Service animal** – An animal is a service animal for a person with a disability, if:
- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.
- iv. **Support person** – A person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services.

4. CORE PRINCIPLES OF THE POLICY

We endeavour to ensure that the Policy and related practices, policies and procedures are consistent with the following four (4) core principles:

- i. **Dignity** – Persons with disabilities must be treated as valued customers as deserving of service as any other customer.
- ii. **Equality of Opportunity** – Persons with disabilities should be given an opportunity equal to that given to others to obtain, use and benefit from our goods and services.
- iii. **Integration** – Wherever possible, persons with disabilities should benefit from our goods and services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, goods and services will, to the extent possible, be provided in another way that takes into account the person's individual needs and aligns with the four (4) core principles.

- iv. **Independence** – Goods and services must be provided in a way that respects the independence of persons with disabilities. To this end, we will always be willing to assist a person with a disability, but will not do so without the express permission of the person.

5. PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES

I. Policies, Practices and Procedures

The Home Depot Canada shall make all reasonable efforts to ensure that its policies, practices and procedures that impact the delivery of its goods and services to the public or to other third parties, are consistent with the principles of dignity, equality of opportunity, integration and independence as defined above.

To this end, The Home Depot Canada has developed this Policy and amended its following customer service related policies:

- HS-045-S-2.1E: Dogs and Other Domestic Pets Standard
- We have also made amendments to the following practices:
- Included alt-tags on all images within our website so that they will be compatible with reading software: www.homedepot.ca

II. Communication

a. Accessible Mediums of Communication

The Home Depot strives to communicate with members of the public in a manner that is accessible. Mediums of communication currently employed include:

- i. www.HomeDepot.ca: A website that provides information in clear plain language in both written and auditory format, and that can easily be navigated and understood by customers using accessibility software
- ii. Web forms on the Company website to provide feedback to key departments and personnel within the Home Depot
- iii. Certain, key signage in store locations that provides information in Braille
- iv. Certain, key signage in store locations in large, clear, and high contrast lettering
- v. Associates in store trained in serving a wide range of customers, including persons with disabilities.

b. Communicating with Persons with disabilities

The Home Depot Canada strives to communicate with persons with disabilities in a manner that takes into account the disability. Approaches for communication are set out in our accessibility training program: Serving Customers with Disabilities. All persons to whom this

policy applies will receive training on how to interact and communicate with persons with various types of disabilities.

III. Assistive Devices

Persons with disabilities are permitted, where possible, to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our goods and services.

If there is a physical, technological, or other type of barrier that prevents the use of an Assistive Device on our premises, we will first endeavour to remove that barrier. If we are not able to remove the barrier, we will ask the person how he or she can be accommodated and what alternative methods of service would be more accessible to him/her. We will make our best efforts to provide an alternative means of assistance for the person with a disability.

All persons to whom this policy applies will receive training on various Assistive Devices that may be used by persons with disabilities while accessing The Home Depot goods and services.

IV. Accessibility at Our Premises

The following facilities and services are offered at some of The Home Depot stores to which the Policy applies to enable persons with disabilities to obtain, use or benefit from its goods and services:

- Scooter with a basket
- Manual wheelchair

In addition, each The Home Depot store offers one-on-one support from associates to access products or to respond to questions

All persons to whom this policy applies will receive training on identifying facilities or services made available on The Home Depot premises to assist persons with disabilities to obtain, use or benefit from The Home Depot goods and services.

V. Service Animals

Persons with disabilities may enter premises owned and/or operated by The Home Depot accompanied by a Service Animal and keep the Service Animal with them if the public has access to such premises and the Service Animal is not otherwise excluded by law.

All persons to whom this Policy applies will receive training on how to interact with persons with disabilities accompanied by a Service Animal.

VI. Support Persons

A person with a disability may enter premises owned and/or operated by The Home Depot Canada with a Support Person and have access to the Support Person while on the premises.

The Home Depot Canada may require a person with a disability to be accompanied by a Support Person where it is necessary to protect the health and/or safety of the person with a disability or the health and/or safety of others on the premises.

All persons to whom this Policy applies will receive training on how to interact with persons with disabilities who are accompanied by a Support Person.

VII. Notice of Temporary Disruption

The Home Depot Canada will notify customers if there is a planned or unexpected disruption of a service that persons with disabilities use to access its goods and services. The notice will be posted in a conspicuous location at the applicable premises. If the disruption relates to accessibility of content on www.homedepot.ca, or our customer care line, notification will be posted on the home page of The Home Depot website.

The notice will include the following information:

- i. That a facility or service is unavailable
- ii. The anticipated duration of the disruption
- iii. The reason for the disruption
- iv. Alternative facilities or services, if available.

6. TRAINING AND RECORDS

The Home Depot Canada will provide training, and ongoing training as required under the Standard to all persons to whom this Policy applies.

Training will include:

- i. A review of the purpose of the Act and requirements of the Standard
- ii. A review of the Policy
- iii. How to interact and communicate with persons with various types of disabilities
- iv. How to interact with persons with disabilities who use an Assistive Device or require the assistance of a Service Animal or Support Person
- v. How to use equipment or devices made available on our premises to assist persons with disabilities to obtain, use or benefit from our goods and services

- vi. What to do if a person with a disability is having difficulty accessing our premises and/or services.

Training will be provided to all persons to whom this Policy applies as soon as practicable after he or she is assigned the applicable duties.

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of the Standard.

7. FEEDBACK PROCEDURE

The Home Depot Canada welcomes and appreciates feedback regarding this Policy and its implementation. Feedback can be provided in the following ways:

- i. In person at any The Home Depot store
- ii. By telephone to our Customer Care team at: 1-800-668-2266
- iii. In writing to:
Customer Care
900 – 1 Concorde Gate
Toronto, ON
M3C 4H9
- iv. Electronically to customercare_Canada@homedepot.com

Where possible, we will respond to feedback within five (5) business days of the date that it is received.

In certain circumstances, specific action may be required to effectively address feedback, including but not limited to conducting an internal investigation and/or review of The Home Depot policies, practices and procedures. In such circumstances the customer will receive an acknowledgement that their feedback has been received within five (5) business days and The Home Depot Canada will respond as soon as is practicable thereafter. In any event, feedback will be provided to the appropriate policy or procedure owner and any required changes will be made within a reasonable period of time.

8. DOCUMENTATION TO BE MADE AVAILABLE

This Policy, and related practices and protocols, shall be made available to any member of the public upon request.

Notification of same shall be posted on The Home Depot Canada website and at a conspicuous place at each premise to which this Policy applies.

9. FORMAT OF DOCUMENTS

The Home Depot Canada will provide documents, or the information contained in documents, required to be provided under the Standard, to a person with a disability in a format that takes the person's disability into account.

10. QUESTIONS ABOUT THIS POLICY

For more information about the Policy or for questions regarding The Home Depot policies, practices and procedures for accessible customer service, please contact:

- i. Any The Home Depot store
- ii. By telephone to our Customer Care team at: 1-800-668-2266
- iii. In writing to:
Customer Care
900 – 1 Concorde Gate
Toronto, ON
M3C 4H9
- iv. Electronically to customercare_Canada@homedepot.com



The Home Depot of Canada Inc.
INTEGRATED ACCESSIBILITY STANDARDS POLICY

1.0 PURPOSE

The purpose of this policy is to set out the requirements of the Integrated Accessibility Standards Regulation (IASR) Ontario Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

The Home Depot of Canada Inc. (“The Home Depot” or “Company”) endeavors to regularly ensure and implement accessibility standards in all of its practices.

This policy is not intended to replace or supersede The Home Depot’s Accessibility Standards for Customer Service Policy, required by *Ontario Regulation 429/07*.

2.0 THE HOME DEPOT COMMITMENT

The Home Depot has eight core values that guide the beliefs and actions of all associates on a daily basis. These values are the fabric of the Company’s unique culture, and include doing the right thing, respect for all people and excellent customer service. Through our values, the Company is committed to ensure a fully accessible environment for all persons with disabilities, and will continue to build upon and improve its practices in addition to ensuring that it meets the accessibility needs of persons with disabilities in a timely manner, consistent with the specific requirements of the Act and its regulations.

This policy will be implemented in accordance with the time frames established by the Regulation.

3.0 GENERAL REQUIREMENTS

3.1 Multi-Year Accessibility Plan

The Home Depot will develop, maintain and document a Multi-Year Accessibility Plan outlining the Company’s strategy to prevent and remove barriers from its workplace and to meet its requirements under the Regulation.

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on The Home Depot's website. Upon request, The Home Depot will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

3.2 Self-Service Kiosk

The Home Depot shall have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

3.3 Training Associates and Volunteers

The Home Depot will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- a) All its associates and volunteers;
- b) All persons who participate in developing The Home Depot's policies; and,
- c) All other persons or third parties who provide goods, services or facilities on behalf of The Home Depot.

Trainings on the requirements shall be appropriate to the duties of the associates, volunteers and other persons. Trainings will continue on an ongoing basis as new associates, volunteers and other persons are hired. Associates will be trained when changes are made to the accessibility policy.

The Home Depot will keep a record of the training it provides.

4.0 INFORMATION AND COMMUNICATIONS STANDARDS

4.1 Feedback

The Home Depot will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

4.2 Accessible Formats and Communication Supports

Upon request, The Home Depot will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

The Home Depot will consult with the person making the request in determining the suitability of an accessible format or communication support.

This does not apply to products and product labels, unconvertible information or communications and information that the Company does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the Company shall provide the person requesting the information or communication with:

- a) An explanation as to why the information or communication is unconvertible; and
- b) A summary of the unconvertible information or communications

4.3 Emergency Information

When The Home Depot prepares emergency procedures, plans or public safety information and makes the information available to the public, the information will be available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

4.4 Accessible Websites and Web Content

The Home Depot shall make their internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA, except where this is impracticable.

5.0 EMPLOYMENT STANDARDS

5.1 Recruitment

The Home Depot will notify its associates and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

5.2 Recruitment, Assessment or Selection Process

The Home Depot 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.

If a selected applicant requests an accommodation, The Home Depot will 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.

5.3 Notice to Successful Applicants

When making offers of employment, The Home Depot will notify the successful applicant of its policies for accommodating associates with disabilities.

5.4 Informing Associates of Supports

The Home Depot will continue to inform its associates of its policies (and any updates to those policies) used to support associates with disabilities, including policies on the provision of job accommodations that take into account an associate's accessibility needs due to disability. This information will be provided to new associates as soon as practicable after commencing employment.

5.5 Accessible Formats and Communication Supports for Associates

Upon the request of an associate with a disability, The Home Depot will consult with the associate to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other associates.

In determining the suitability of an accessible format or communication support, The Home Depot will consult with the associate making the request.

5.6 Workplace Emergency Response Information

The Home Depot will provide individualized workplace emergency response information to associates who have a disability, if the disability is such that the individualized information is necessary, and if The Home Depot is aware of the need for accommodation due to the associate's disability. The Home Depot will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the associate requires assistance, The Home Depot will, with the consent of the associate, provide the workplace emergency response information to the person designated by The Home Depot to provide assistance to the associate.

The Home Depot will review the individualized workplace emergency response information when the associate moves to a different location in the organization, when the associate's overall accommodations needs or plans are reviewed, and, when The Home Depot reviews its general emergency response policies.

5.7 Documented Individual Accommodation Plans

A written process for the development and maintenance of documented individual accommodation plans shall be developed for associates with disabilities. If requested, these plans shall include information regarding accessible formats and communication supports.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

5.8 Return to Work Process

The Home Depot will maintain a documented return to work process for its associates 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 outline the steps The Home Depot will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the *Workplace Safety Insurance Act, 1997*).

5.9 Performance Management, Career Development and Advancement & Redeployment

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

6.0 BUILT ENVIRONMENT

The Home Depot will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, if ever applicable (namely relating to: exterior paths of travel, accessible parking and/or operating service). The Home Depot shall follow the enhanced Ontario's Building Code (including O. Reg 368/13, effective January 1, 2015) for new construction and major changes to existing features.

7.0 REVIEW PERIOD

This policy shall be reviewed annually and will be revised in light of any legislative or organizational changes.



**The Home Depot of Canada Inc.
MULTI-YEAR ACCESSIBILITY PLAN**

INTRODUCTION

Under the Accessibility for Ontarians with Disabilities Act (“AODA”), 2005, and specifically Regulation 191/11 “Integrated Accessibility Standards” (“IASR”), the Government of Ontario, Legislative Assembly, designated public sector and private sector organizations, including The Home Depot of Canada Inc. (“The Home Depot” or “Company”), are required to develop multi-year accessibility plans outlining their strategy to prevent and remove barriers, and to meet requirements under the Regulation. (O. Reg. 191/11, s.4)

This multi-year plan outlines The Home Depot’s strategy to prevent and remove barriers to address the current and future requirements of the IASR, and fulfill The Home Depot’s commitment as outlined in the Company’s IASR Policy.

1.0 SELF-SERVICE KIOSKS

The Home Depot will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. (O. Reg. 191/11, s.6)

Planned Action:

The Home Depot will consider and incorporate accessibility features when designing, procuring or acquiring self-service kiosk, except where it is not practicable to do so. Where The Home Depot has decided that it is not practicable to incorporate accessibility criteria and features, the Company will provide an explanation upon request.

Implementation Timeframe:

By January 1, 2014 and ongoing

2.0 TRAINING

The Home Depot will train:

- associates and volunteers;
- all persons who participate in developing the organization’s policies; and
- all other persons who provide goods, services or facilities on behalf of the organization,

on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code* as it pertains to persons with disabilities as well as any changes to the Company’s accessibility policies. The training shall be appropriate to the duties of the associates, volunteers and other persons. (O. Reg. 191/11, s. 7)

Planned Action:

The Home Depot will provide training to associates on the *Human Rights Code* and accessibility and removing barriers for persons with disabilities. In order to ensure the Company is in full compliance with the Regulation, The Home Depot will provide additional training to associates, volunteers and other persons as required by the IASR and will keep a training record including training dates and the number of individuals training was provided to.

Implementation Timeframe:

By January 1, 2015 and ongoing

3.0 INFORMATION AND COMMUNICATIONS

3.1 Feedback

The Home Depot will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities. (O. Reg. 191/11, s.11)

Planned Action:

The Home Depot will ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.

When accessible formats and communication supports for persons with disabilities are requested, The Home Depot will:

- Provide or arrange for the provision of such accessible formats and communication supports if practicable, or otherwise consider reasonable alternatives to achieve accessibility;
- Consult with the person making the request to determine the suitability of the accessible format or communication support;
- Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person’s accessibility needs due to disability;

- Notify the public about the availability of accessible formats and communication supports.

The Home Depot will review its feedback process set out in its Accessibility Standards for Customer Service policy to ensure that it is accessible to persons with disabilities by providing, or arranging for the provision of accessible formats and communications supports, upon request.

Implementation Timeframe:

By January 1, 2015 and ongoing

3.2 Accessible Formats and Communication Supports

Upon request, The Home Depot will provide or arrange for the provision of accessible formats and communications supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

The Home Depot will consult with the person making the request.

The Home Depot will notify the public about the availability of accessible formats and communication supports. (O. Reg. 191/11, s.12)

Planned Action:

The Home Depot will develop a procedure relating to accessible formats and communications supports for persons with disabilities and notify the public about the availability of accessible formats and communication supports.

In addition to the above, and in accordance to O.Reg.191/11, s.13, if The Home Depot prepares emergency procedures, plans or public safety information and makes the information available to the public, the Home Depot will provide this information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Implementation Timeframe:

By January 1, 2016 and ongoing (however, the emergency procedures section will be available by January 1, 2012 and ongoing).

3.3 Accessible Websites and Web Content

The Home Depot's Internet websites, including web content, will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where impracticable. (O.Reg. 191/11, s. 14)

Planned Action:

The Home Depot will ensure that its Internet websites are developed in accordance with the WCAG as required by the Regulation.

The Home Depot will ensure all new material posted to its websites conforms to WCAG as required by the Regulation.

Implementation Timeframe:

- By January 1, 2014, new internet websites and web content on those sites will conform to WCAG 2.0 at level A unless this is impracticable.
- By January 1, 2021, all public websites and web content will conform to WCAG 2.0 at level AA unless this is impracticable.

4.0 EMPLOYMENT**4.1 Recruitment Process**

The Home Depot will notify its associates and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. (O. Reg. 191/11, s.22)

The Home Depot will 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. (O.Reg.191/11, s. 23(1))

The Home Depot will consult with applicants requesting accommodation, and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's accessibility needs due to disability. (O. Reg. 191/11, s. 23(2))

When making offers of employment, The Home Depot shall notify the successful applicant about its policies for accommodating associates with disabilities. (O. Reg. 191/11, s.24)

Planned Action:

Notice about available accommodations will be set out in internal and external communications relating to recruitment.

The Home Depot will continue to advise job applicants when they are selected to participate in an assessment or selection process, about the availability of accommodations.

Applicants requesting accommodation will continue to be consulted about their needs and appropriate accommodation will be provided.

All offers of employment shall include reference to The Home Depot's accommodation policies.

Implementation Timeframe:

January 1, 2016 and ongoing

4.2 Informing Associates of Supports

The Home Depot will inform its associates of its policies, or changes to its policies, used to support its associates with disabilities, including job accommodation policies. (O. Reg. 191/11, s. 25(1))

The Home Depot will provide this information to new associates as soon as practicable. (O. Reg. 191/11, s. 25(2))

The Home Depot will provide updated information to its associates whenever there is a change to existing policies on the provision of job accommodations that take into account an associate's accessibility needs due to disability. (O. Reg. 191/11, s. 25(3))

In consultation with an associate requesting accommodation, the Company will provide accommodation supports, including accessible formats and communication supports, needed for the associate to perform their job and that is generally available to associates in the workplace. (O. Reg. 191/11, s.26)

Planned Action:

The Home Depot will review its existing accommodation policies and make any necessary changes to ensure full compliance with the Regulation.

The Home Depot will continue to inform associates of relevant policies and policy changes.

The Home Depot will continue to respond to individual accommodation requests.

Implementation Timeframe:

January 1, 2016 and ongoing

4.3 Workplace Emergency Response Information

If The Home Depot is aware that an associate needs accommodation with respect to workplace emergencies, individualized workplace emergency response information will be provided to the associate as soon as practicable. (O. Reg. 191/11, s. 27(1))

If the associate requires assistance in an emergency, with the associate's consent The Home Depot will provide the workplace emergency response information to a person designated to provide assistance to the associate. (O. Reg. 191/11, s. 27(2))

Individualized workplace emergency response information will be updated when the associate moves to a different location, and when overall accommodations needs or plans or general emergency response policies are reviewed. (O. Reg. 191/11, s. 27(3))

Planned Action:

The Home Depot will review its existing workplace emergency procedures and update them, if necessary, to ensure compliance with this Accessibility Plan and the Regulation.

The Home Depot will advise associates to provide notice of any accommodation needs with respect to workplace emergencies.

If appropriate and in consultation with associates needing accommodation, the Company will continue to prepare and provide associates with individualized workplace emergency response information. The Home Depot will continue to keep a confidential record of individualized workplace emergency response information requests and responses.

The Home Depot will designate individuals to assist associates needing accommodation during workplace emergencies and, with the consent of the affected associate, may provide the individualized workplace emergency response information to the designated individual.

Implementation Timeframe:

By January 1, 2012 and ongoing

4.4 Individual Accommodation Plans

The Home Depot will establish a written process for the development of documented individual accommodation plans for associates with disabilities. (O.Reg191/11, s. 28(1))

Planned Action:

The Home Depot will establish an accommodation policy, which provides accommodation plans for associates with disabilities, to ensure full compliance with the IASR. The elements of the policy relating to individual accommodation plans shall include:

- The manner in which an associate requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the associate is assessed on an individual basis.

- The manner in which The Home Depot can request an evaluation by an outside medical or other expert, to assist the Company in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- The steps taken to protect the privacy of the associate's personal information with respect to accommodation.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the associate.
- The means of providing the individual accommodation plan in a format that takes into account the associate's accessibility needs due to disability.

Individual accommodation plans will:

- If requested, include relevant information regarding accessible formats and communications supports to be provided;
- If required, include individualized workplace emergency response information; and
- Identify any other accommodation that is to be provided.

Implementation Timeframe:

By January 1, 2016 and ongoing

4.5 Return to Work

The Home Depot will develop, implement and document a return to work process for its associates who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. (O. Reg. 191/11, s. 29(1))

The Return to Work process will outline the steps the Company will take to facilitate the return to work, and will include documented individual accommodation plans as part of the process. (O. Reg. 191/11, s. 29(2))

Planned Action:

The Home Depot's return to work process for associates who have been absent from work due to disability and who required disability-related accommodations to return to work is currently set out in its Worker Reintegration Process.

The Home Depot will review and amend its existing policy relating to associates with disabilities returning to work to ensure full compliance with this Accessibility Plan and the Regulation.

Implementation Timeframe:

By January 1, 2016 and ongoing

4.6 Performance Management, Career Development and Advancement, and Redeployment

The Home Depot will take into account the accessibility needs of associates with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to associates, or when engaging in associate redeployment. (O. Reg. 191/11, ss.30 to 32)

Proposed Action:

The Home Depot will continue to ensure that managers are aware of their responsibility to take into account the accessibility needs of associates with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to associates, or when engaging in associate redeployment.

Implementation Timeframe:

By January 1, 2016 and ongoing

5.0 DESIGN OF PUBLIC SPACES STANDARD

The Home Depot will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces, if ever applicable (namely relating to: exterior paths of travel, accessible parking and/or operating service). The Home Depot shall follow the enhanced Ontario Building Code (O. Reg. 368/13) for new construction and major changes to existing features. (O. Reg. 413/12)

Proposed Action:

The Home Depot will ensure that accessibility standards are incorporated when building new stores or making major modifications to public spaces.

Implementation Timeframe:

By January 1, 2017 and ongoing for the Design of Public Spaces (however, the Ontario Building Code is effective January 1, 2015)

INTRODUCTION

The Accessibility for Manitobans Act (AMA) is legislation which provides a proactive process to remove barriers affecting persons with disabilities and many other citizens. The Government of Manitoba is committed to making Manitoba more inclusive for everyone.

Accessibility standards are building blocks for making real, measurable and effective changes to accessibility. Each standard will outline specific requirements and timelines for organizations that have a responsibility to eliminate barriers.

The first accessibility standard focuses on customer service. The Accessible Customer Service Standard (the “Standard”) has been established to ensure accessible customer service is provided when all persons who are reasonably expected to seek to obtain, use or benefit from a good or service have the same opportunity to obtain, use or benefit from the good or service.

At The Home Depot Canada, we are committed to providing an environment that is, and feels, accessible for all people. In alignment with our core values of Respect for all People and Excellent Customer Service, we are committed to providing barrier-free, exceptional customer service to all, including persons with disabilities.

DEFINITIONS

DISABILITY – Manitoba law prohibits discrimination against individuals based on various characteristics including physical or mental disability or related characteristics or circumstances, including reliance on a service animal, a wheelchair, or any other remedial appliance or device.

The focus of this legislation is on obstacles to full participation in society rather than on the condition or state of an individual, since discrimination based on disability may be based as much on perceptions, stereotypes and social constructs as the existence of actual functional limitations.

A person need not have to demonstrate that they are disabled for all purposes or at all times in order to experience discrimination on the basis of disability in a given situation. A disability may not only be a condition that is visible (for example, a physical limitation), but can also be hidden from view (for example, learning disabilities). In some cases, these invisible disabilities may be readily identified objectively (e.g. H.I.V./A.I.D.S., Hepatitis C, and other communicable or infectious conditions).

Some medical conditions can also go through phases where symptoms are readily detectable, and through other phases where they are asymptomatic or in remission. Other disabilities may be more difficult to observe (for example, chronic fatigue syndrome or major depression). Because non-evident disabilities are not “seen”, many are not well understood by society. This can lead to reluctance to acknowledge the existence of the disability, stereotyping, stigma and prejudice.

ASSISTIVE DEVICE – Any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living.

SERVICE ANIMAL – means an animal that has been trained to provide assistance to a person with a disability that relates to that person's disability.

SUPPORT PERSONS – means, in relation to a person who is disabled by a barrier, a person who accompanies the person to (a) support the person obtaining, using or benefiting from a good or service provided by an organization; or (b) assist the person in addressing their communication, mobility, personal care or medical needs.

ASSOCIATES AFFECTED

This policy applies to all associates who deal with members of the public or third parties in Manitoba.

This policy also applies to all persons responsible for the development, implementation, or oversight of The Home Depot Canada’s policies, practices and procedures.

CORE PRINCIPLES OF THE POLICY

We endeavour to ensure that the Policy and related practices, policies and procedures are consistent with the following four (4) core principles:

- v. **Dignity** – Persons with disabilities must be treated as valued customers as deserving of service as any other customer.
- vi. **Equality of Opportunity** – Persons with disabilities should be given an opportunity equal to that given to others to obtain, use and benefit from our goods and services.
- vii. **Integration** – Wherever possible, persons with disabilities should benefit from our goods and services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, goods and services will, to the extent possible, be provided in another way that takes into account the person’s individual needs and aligns with the four (4) core principles.

- viii. **Independence** – Goods and services must be provided in a way that respects the independence of persons with disabilities. To this end, we will always be willing to assist a person with a disability, but will not do so without the express permission of the person.

PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES

VIII. Policies, Practices and Procedures

The Home Depot Canada shall make all reasonable efforts to ensure that its policies, practices and procedures that impact the delivery of its goods and services to the public or to other third parties, are consistent with the principles of dignity, equality of opportunity, integration and independence as defined above.

To this end, The Home Depot Canada has developed this Policy and amended its following customer service related policies:

- HS-045-S-2.1E: Dogs and Other Domestic Pets Standard
We have also made amendments to the following practices:
- Included alt-tags on all images within our website so that they will be compatible with reading software: www.homedepot.ca

IX. Communication

c. Accessible Mediums of Communication

The Home Depot strives to communicate with members of the public in a manner that is accessible. Mediums of communication currently employed include:

- vi. www.HomeDepot.ca: A website that provides information in clear plain language in both written and auditory format, and that can easily be navigated and understood by customers using accessibility software
- vii. Web forms on the Company website to provide feedback to key departments and personnel within the Home Depot
- viii. Certain, key signage in store locations that provides information in Braille
- ix. Certain, key signage in store locations in large, clear, and high contrast lettering
- x. Associates in store trained in serving a wide range of customers, including persons with disabilities.

d. Communicating with Persons with disabilities

The Home Depot Canada strives to communicate with persons with disabilities in a manner that takes into account the disability. Approaches for communication are set out in our accessibility training program: Serving Customers with Disabilities. All persons to whom this policy applies will receive training on how to interact and communicate with persons with various types of disabilities.

X. Assistive Devices

Persons with disabilities are permitted, where possible, to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our goods and services.

If there is a physical, technological, or other type of barrier that prevents the use of an Assistive Device on our premises, we will first endeavor to remove that barrier. If we are not able to remove the barrier, we will ask the person how they can be accommodated and what alternative methods of service would be more accessible for them. We will make our best efforts to provide an alternative means of assistance for the person with a disability.

Assistive devices should not be touched without first receiving permission to do so and asking the person for instructions as to how assistance can be provided.

All persons to whom this policy applies will receive training on various Assistive Devices that may be used by persons with disabilities while accessing The Home Depot goods and services.

XI. Accessibility at Our Premises

The following facilities and services are offered at some of The Home Depot stores to which the Policy applies to enable persons with disabilities to obtain, use or benefit from its goods and services:

- Scooter with a basket
- Manual wheelchair

In addition, each The Home Depot store offers one-on-one support from associates to access products or to respond to questions.

All persons to whom this policy applies will receive training on identifying facilities or services made available on The Home Depot premises to assist persons with disabilities to obtain, use or benefit from The Home Depot goods and services.

XII. Service Animals

Persons with disabilities may enter premises owned and/or operated by The Home Depot accompanied by a Service Animal and keep the Service Animal with them if the public has access to such premises and the Service Animal is not otherwise excluded by law.

All persons to whom this Policy applies will receive training on how to interact with persons with disabilities accompanied by a Service Animal.

XIII. Support Persons

A person with a disability may enter premises owned and/or operated by The Home Depot Canada with a Support Person and have access to the Support Person while on the premises.

The Home Depot Canada may require a person with a disability to be accompanied by a Support Person where it is necessary to protect the health and/or safety of the person with a disability or the health and/or safety of others on the premises.

All persons to whom this Policy applies will receive training on how to interact with persons with disabilities who are accompanied by a Support Person.

XIV. Notice of Temporary Disruption

The Home Depot Canada will notify customers if there is a planned or unexpected disruption of a service that persons with disabilities use to access its goods and services. The notice will be posted in a conspicuous location at the applicable premises and on The Home Depot website. If the disruption relates to accessibility of content on www.homedepot.ca, or our customer care line, notification will be posted on the home page of The Home Depot website.

The notice will include the following information:

- v. that a facility or service is unavailable;
- vi. the anticipated duration of the disruption;
- vii. the reason for the disruption; and
- viii. alternative facilities or services, if available.

TRAINING AND RECORDS

The Home Depot Canada will provide training, and ongoing training as required under the Standard to all persons to whom this Policy applies. Training will include:

- vii. a review of the purpose of the Act and requirements of the Standard;
- viii. a review of the Policy;

- ix. how to interact and communicate with persons with various types of disabilities;
- x. how to interact with persons with disabilities who use an Assistive Device or require the assistance of a Service Animal or Support Person;
- xi. how to use equipment or devices made available on our premises to assist persons with disabilities to obtain, use or benefit from our goods and services; and
- xii. what to do if a person with a disability is having difficulty accessing our premises and/or services.

Training will be provided to all persons to whom this Policy applies as soon as practicable after they are assigned the applicable duties.

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of the Standard.

FEEDBACK PROCEDURE

The Home Depot Canada welcomes and appreciates feedback regarding this Policy and its implementation. Feedback can be provided in the following ways:

- v. in person at any The Home Depot store;
- vi. by telephone to our Customer Care team at: 1-800-668-2266;
- vii. in writing to:
Customer Care
400 – 1 Concorde Gate
Toronto, ON
M3C 4H9; or
- viii. electronically to customercare_Canada@homedepot.com.

Where possible, we will respond to feedback within five (5) business days of the date that it is received.

In certain circumstances, specific action may be required to effectively address feedback, including but not limited to conducting an internal investigation and/or review of The Home Depot policies, practices and procedures. In such circumstances the customer will receive an acknowledgement that their feedback has been received within five (5) business days and The Home Depot Canada will respond as soon as is practicable thereafter. In any event, feedback will be provided to the appropriate policy or procedure owner and any required changes will be made within a reasonable period of time.

DOCUMENTATION TO BE MADE AVAILABLE

This Policy, and related practices and protocols, shall be made available to any member of the public upon request.

Notification of same shall be posted on The Home Depot Canada website and at a conspicuous place at each premise to which this Policy applies.

FORMAT OF DOCUMENTS

The Home Depot Canada will provide documents, or the information contained in documents, required to be provided under the Standard, to a person with a disability in a format that takes the person's disability into account.

QUESTIONS ABOUT THIS POLICY

For more information about the Policy or for questions regarding The Home Depot policies, practices and procedures for accessible customer service, please contact:

- v. any The Home Depot store
- vi. by telephone to our Customer Care team at: 1-800-668-2266
- vii. in writing to:
Customer Care
400 – 1 Concorde Gate
Toronto, ON
M3C 4H9; or
- viii. electronically to customercare_Canada@homedepot.com.