



## **MARRIOTT HOTELS OF CANADA** **MULTI-YEAR ACCESSIBILITY PLAN**

*Created: January 1, 2014*  
*Last Update: June 28, 2021*

Marriott Hotels of Canada (the “Company”) strives to provide excellent service to all its patrons and to ensure access to its goods, services and facilities in a manner that respects the dignity and independence of its patrons with disabilities. This Multi-Year Accessibility Plan (the “Plan”) outlines Marriott Hotels of Canada’s commitment to accessibility, integration and equal opportunity. Please refer to Appendix A for a list of all legal entities under Marriott Hotels of Canada.

### **Statement of Commitment**

**Marriott Hotels of Canada** is committed to the *Accessibility for Ontarians with Disabilities Act*, its regulations, standards and all other relevant legislation concerning accessibility.

**Marriott Hotels of Canada** is committed to providing an accessible environment in which all individuals have equal access to our facilities and services in a way that respects the dignity and independence of persons with disabilities. This includes creating and fostering inclusive and positive attitudes that are considerate and accommodating to all individuals, including persons with disabilities. Our commitment is to provide all customers, including those living with disabilities, the same opportunity to access our services in the same place and in a similar way to all others.

### **Purpose**

This purpose of this Plan is to outline the policies, procedures and actions that **Marriott Hotels of Canada** will put in place to make its premises and services accessible to patrons with disabilities. This Policy is intended to meet the requirements of *Ontario Regulation 191/11* (the “Regulation”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and the *Ontario Human Rights Code*.

### **Accessible Emergency Information and Workplace Emergency Response Information**

**Marriott Hotels of Canada** has prepared an accessible Individualized Workplace Emergency Response and Information Form and can provide accessible emergency information upon request.

### **Implementation Timeframe:**

Effective June 30, 2021 and ongoing as applicable.

## **Training**

**Marriott Hotels of Canada** has developed a training program, pursuant to the Company's Accessibility policy, to ensure all current and new staff are knowledgeable on Ontario's accessibility laws, as applicable, and on the *Human Rights Code* ("the *Code*") as it relates to people with disabilities.

- **Marriott Hotels of Canada** has determined the training requirements of the accessibility standards referred to under the Regulation and on the *Code* as it pertains to persons with disabilities;
- **Marriott Hotels of Canada** will utilize its training resources to determine appropriate training methods and delivery;
- **Marriott Hotels of Canada** will maintain training dates and other information regarding who has been trained, including the number of individuals to whom the training has been provided;
- **Marriott Hotels of Canada** will ensure training is provided on any related policy changes.

### **Implementation Timeframe:**

Effective January 1, 2012 and ongoing as applicable.

## **Information and Communications**

### ***Accessible Formats and Communication Supports***

**Marriott Hotels of Canada** has taken or will take the following steps to make sure all publicly available information is made accessible upon request.

- **Marriott Hotels of Canada** will respond to requests in a timely manner that takes into account the person making the request's accessibility needs due to disability.
- **Marriott Hotels of Canada** will consult with the person making the request in determining the suitability of an accessible format or communication support.
- **Marriott Hotels of Canada** will have a process in place for persons with disabilities to be provided with information and communication in an accessible format and provide such information or explain, in writing, when an accessible format is not feasible and why.
- **Marriott Hotels of Canada** will train staff who may receive requests for accessible information on how to manage requests and obtain accessible formats.
- **Marriott Hotels of Canada** will provide publicly available information at a cost that is no more than the regular cost charged to other persons.
- **Marriott Hotels of Canada** will notify the public about the availability of accessible formats and communications supports.

### **Implementation Timeframe:**

By January 1, 2016 and ongoing as applicable.

### *Websites*

**Marriott Hotels of Canada** has taken steps to ensure all new websites and new web content developed in Ontario conform with WCAG 2.0, Level A.

**Marriott Hotels of Canada** will take the following steps to make any Ontario-based public websites and web content conform to WCAG 2.0, Level AA.

- **Marriott Hotels of Canada** will incorporate into the Company's website project management a requirement that all new Ontario-based websites and web content conform with the WCAG 2.0 Level AA.
- **Marriott Hotels of Canada** will assess and evaluate all Ontario-based public websites and public web content in Ontario for conformance with accessibility standards.
- If not in conformance with WCAG 2.0 Level AA, **Marriott Hotels of Canada** will consult with its internal IT department and external consultants, as needed, regarding necessary changes to bring to the websites and web content into compliance.
- **Marriott Hotels of Canada** will engage the services of an external website consultant who will be engaged to make the above improvements to the websites and web content to the extent the internal IT department is unable to make the necessary changes.
- **Marriott Hotels of Canada** will ensure that necessary improvements to the Ontario-based website and/or web content are made by the internal IT department or third party provider.

### **Implementation Timeframe:**

By January 1, 2021 and ongoing as applicable.

### *Feedback*

**Marriott Hotels of Canada** has implemented accessible feedback procedures pursuant to the Accessibility Policy.

- **Marriott Hotels of Canada** will advise customers and clients that feedback can be given in person, by mail, by phone, by fax or by e-mail to:  
[CanadaApplicationAccommodation@marriott.com](mailto:CanadaApplicationAccommodation@marriott.com)  
905-366-5227
- **Marriott Hotels of Canada** has established a process for receiving and responding to feedback about the manner in which it provides goods, services or facilities to persons with disabilities and the feedback process itself.
- **Marriott Hotels of Canada** will advise the public that such feedback process is available and that the Company has prepared a document describing the accessibility feedback process, which is available on request. Such document specifies the actions that **Marriott Hotels of Canada** will take if a complaint is received. Such document is available on request.
- **Marriott Hotels of Canada** will make known the supports that are available to facilitate the submission of feedback.
- **Marriott Hotels of Canada** will commit to responding to feedback as soon as practicable.

**Implementation Timeframe:**

By January 1, 2015 and ongoing as applicable.

**Employment**

*Hiring*

**Marriott Hotels of Canada** has taken or will take the following steps to notify the public and staff that it will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.

- **Marriott Hotels of Canada** will include a statement in any job advertisements that **Marriott Hotels of Canada** will hire individuals with disabilities and will provide accommodations during the recruitment process.
- If a job applicant requests accommodation, **Marriott Hotels of Canada** will consult with the individual and make adjustments that best suite his/her accessibility needs due to disability in relation to the materials or processes to be used and to the extent required by law.
- **Marriott Hotels of Canada** will confirm, in any interview, that it will hire individuals with disabilities.
- **Marriott Hotels of Canada** will notify successful applicants of its policies for accommodating employees with disabilities in any offer letter.
- **Marriott Hotels of Canada** will include in the **Marriott Hotels of Canada** “New Hire Orientation” training program a section on accessibility and the *Code*, as appropriate.
- **Marriott Hotels of Canada** will advise current employees of the policies on accessibility and the *Code* that are accessible on the Company’s Internal Communication boards and Intranet Portal.
- **Marriott Hotels of Canada** will advise employees when any changes are made to the above policies.
- **Marriott Hotels of Canada** will review existing policies and procedures, and where necessary, augment processes for persons with disabilities.

**Implementation Timeframe:**

By January 1, 2016 and ongoing as applicable.

*Individual Accommodation Plans*

**Marriott Hotels of Canada** has developed and implemented a process for designing Individual Accommodation Plans (“IAP”) and a return-to-work process for employees that have been absent due to a disability.

- The process to develop an IAP will include the following:
  - The manner in which the employee can participate in the development of the IAP;
  - The means by which an employee is to be assessed on an individual basis;

- Identification of accommodation(s) to be provided;
- Timelines for the provision of accommodation(s);
- The manner in which the employee can request the participation of a representative;
- How **Marriott Hotels of Canada** may request an evaluation by outside medical or other expert, at the Company's expense, to assist with determining necessary accommodation(s) and how to achieve said accommodation(s);
- Steps to be taken to protect the privacy of the employee's personal information;
- The frequency with which the IAP will be reviewed and updated and the manner in which this will be done;
- If an accommodation is denied, the manner in which the reasons for denial are to be provided to the employee; and
- The means of providing accessible formats or communication supports that take into account the employee's accessibility needs due to disability.
- The return-to-work process shall:
  - Outline the steps that **Marriott Hotels of Canada** will take to facilitate the return to work of employees who were absent because their disability required them to be away from work;
  - Use the IAPs outlined above as part of the process.

**Implementation Timeframe:**

By January 1, 2016 and ongoing as applicable.

**Service Disruptions**

**Marriott Hotels of Canada** has put procedures in place to prevent and respond to service disruptions. The response is set out in the Company's Accessibility Policy.

**Implementation Timeframe:**

Effective immediately and ongoing as applicable.

**Policy Review**

The Multi-Year Accessibility Plan is a tool for **Marriott Hotels of Canada** to communicate its accessibility initiatives internally and to the public. **Marriott Hotels of Canada** will update and review this Plan at least once every five (5) years, and update it as appropriate. The Plan is next scheduled to be reviewed no later than **January 1, 2024**. The Plan will be posted on the Company's website.

**Implementation Timeframe:**

By January 1, 2024 and ongoing as applicable.

### **For more information**

For more information on this accessibility plan, please contact the Marriott Hotels of Canada Human Resources department.

Telephone: 905-366-5227

Email: [CanadaApplicationAccommodation@marriott.com](mailto:CanadaApplicationAccommodation@marriott.com)

Please note accessible formats of this Multi-Year Accessibility Plan are available free upon request. We will consult with customers with disabilities making the request to determine the suitability of an accessible format or communication support provided.

### **Appendix A**

#### List of Legal Entities Under Marriott Hotels of Canada

- Sheraton Gateway LP (Sheraton Gateway Hotel in Toronto International Airport)
- Sheraton Centre Toronto Limited Partnership (Sheraton Centre Toronto Hotel)
- Starwood Canada, ULC (The Westin Harbour Castle, W Toronto, The Westin Ottawa)
- Luxury Canada, ULC (The St. Regis Toronto)
- Domain Hospitality Corporation (Delta Hotels Waterloo)
- Luxury Hotels International of Canada, ULC (Delta Hotels Toronto, Marriott Downtown at CF Toronto Eaton Centre, Delta Hotels Ottawa City Centre, Toronto Airport Marriott, Residence Inn Gravenhurst Muskoka Wharf, Toronto Marriott Markham, Canada Regional Office, Sarnia CEC)
- 2566305 Ontario Inc. (Delta Hotels Sault Ste. Marie Waterfront)
- Fifty Stone Road West (Guelph) Limited Partnership (Delta Hotels Guelph Conference Centre)
- TB Properties LP (Delta Hotels Thunder Bay)
- CYM Toronto GP Inc., Kingsett Real Estate Growth LP No. 5 (Courtyard Toronto Downtown)
- The Ritz Carlton Hotel Company of Canada LTD c/o the Ritz-Carlton Toronto (The Ritz-Carlton Toronto)
- Toronto Standard Condominium Corporation No. 2279 (The St. Regis Toronto Residences)
- Toronto Standard Condominium Corporation No. 2165 (The Ritz-Carlton Toronto Residences)