

**LA Fitness's Policies under the *Accessibility for Ontarians with Disabilities Act, 2005*  
(Ontario, Canada)**

**1. ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY**

**Applicability**

This policy applies to all persons who provide, on behalf of the LAF Canada Company, doing business as L.A. Fitness (the "Company"), goods, services or facilities directly to the public or to other organizations in **Ontario, Canada**, including employees, volunteers, agents, contractors and third parties (collectively referred to as "personnel" in this Accessibility Standards for Customer Service policy).

**Purpose**

The Company is committed to providing a barrier-free environment for its customers and to providing goods and services in a manner respectful of the dignity and independence of people with disabilities. This Accessibility Standards for Customer Service policy, which complies with the customer service requirements of Ontario, Canada's *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA"), memorializes our commitment to these goals.

**Principles**

The Company will ensure that this policy and any related practices or procedures are consistent with the following core principles.

- **Dignity.** People with disabilities should be treated as valued customers who are as deserving of effective and full service as other customers.
- **Independence.** Goods, services and facilities must be provided without the control or influence of others, and the freedom of people with disabilities to make their own decisions must be respected.
- **Integration.** People with disabilities must be able to benefit from services or products in the same place and the same or similar manner as other customers, whenever possible.
- **Equality of Opportunity.** People with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from goods, services and facilities.

**Providing Goods and Services to Persons with Disabilities**

The Company is committed to excellence in serving all of its customers, including those with disabilities, as demonstrated by its attention to the following.

## **Communication**

We will communicate with people with disabilities in ways that take into account their disability. We currently offer the following mediums of accessible communication: in person, at any Ontario club; by email, at [aoda@fitnessintl.com](mailto:aoda@fitnessintl.com); and by telephone, at each club's local number. Personnel will be trained to use these methods of communication as ways to facilitate interactions with people with various types of disabilities.

## **Assistive Devices**

Personnel will be introduced to various assistive devices that may be used by our customers with disabilities while accessing our goods, services and facilities. We will also ensure that such personnel are trained and familiar with the following devices and accommodations that are available on our premises for our customers: pool lifts, elevators, door-assist buttons, accessible washrooms, handrails, ramps, and signage.

## **Service Animals or Support Persons**

Service animals are welcome on the publicly accessible parts of our premises, free of charge, when accompanying people with disabilities, unless such animals are otherwise excluded by law (in which case we will explain the exclusion and explore alternative measures of accommodation). If it is not readily apparent that an animal is a service animal, we may ask for a letter from a regulated health professional confirming that the person needs the service animal for reasons relating to their disability.

Likewise, support persons may enter our publicly accessible spaces during normal business hours, free of charge, as long as they are accompanying persons with disabilities. In the event we require a person with a disability to be accompanied by a support person for health or safety reasons, we will, before making such a decision:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

We will ensure that relevant personnel are trained to appropriately interact with any person with a disability who is accompanied by a service animal or a support person.

## **Notice of Temporary Disruption**

In the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities, we will post a notice at the entrance that identifies the unavailable facility or service, the reason for the disruption, the expected duration of the disruption, and alternative facilities or services, if available. Information about disruptions will also be posted on the Company's website under "News."

## **Training and Record Keeping**

We will ensure that all employees and volunteers (if any) at an LA Fitness club in Ontario, and persons who participate in developing LA Fitness's policies in Ontario, and other persons who provide goods, services or facilities on behalf of LA Fitness in Ontario, are appropriately trained. Training will be provided as soon as practicable after hiring or engagement, on commencement of new or additional duties that require training, and on an ongoing basis when changes are made to applicable policy, practices or procedures. Training will include:

- a review of the AODA's purpose, the requirements of the customer service standard, and this policy;
- a primer on interacting and communicating with persons with disabilities;
- direction on how to interact with persons who use assistive devices or who require the assistance of a service animal or a support person;
- instruction on how to use assistive devices provided by the Company; and
- instruction on how to assist a person with a disability who is experiencing difficulty accessing the Company's premises, goods or services.

The Company will maintain accurate and up-to-date training records, which shall include the dates of training and the number of individuals to whom the training was provided.

## **Feedback Process**

We welcome feedback from the public regarding this policy and its implementation. Feedback regarding the way the Company provides goods, services and facilities to people with disabilities can be made:

- in person at any club in Ontario;
- by email via [aoda@fitnessintl.com](mailto:aoda@fitnessintl.com); or
- in writing to LAF Canada Company, c/o Fitness International, LLC, 3161 Michelson Drive, Suite 600, Irvine, California 92612, USA ATTN: Compliance Counsel.

Upon request, the Company will arrange for reasonable alternative feedback processes to ensure that such process is accessible.

Feedback will be directed to the Company's Compliance Counsel or to Human Resources, as appropriate. Individuals providing feedback can expect a response within 30 business days of receipt.

## **Documentation**

This Accessibility Standards for Customer Service policy shall be available to members of the public upon request, and, as soon as practicable, in a format that takes into account a

person's disability, if applicable. Notification of the availability of this documentation will be posted in a conspicuous place at each of our Ontario locations.

### **Modifications**

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no change will be made to this policy before considering the impact on people with disabilities. Any policy of the Company that does not respect and promote the dignity of people with disabilities will be modified or terminated.

### **Questions/Clarification**

This policy exists to achieve service excellence to customers with disabilities. Any employee with a question about this policy, or its associated practices or procedures, should contact Human Resources.

## **2. INTEGRATED ACCESSIBILITY STANDARDS REGULATION POLICY: STATEMENT OF COMMITMENT, POLICY AND MULTI-YEAR PLAN**

### **Applicability**

This policy and plan formalizes the commitment of LAF Canada Company, doing business as L.A. Fitness (the “Company”), to accessibility, and outlines those steps that the Company will take to remove barriers and improve opportunities for people with disabilities in Ontario, Canada through compliance with Ontario’s Integrated Accessibility Standards Regulation (the “Integrated Standard”).

### **STATEMENT OF COMMITMENT:**

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. The Company believes in integration and equal opportunity, is committed to meeting the needs of people with disabilities in a timely manner by making reasonable accommodations for such individuals, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

### **POLICY AND PLAN:**

#### **General**

1. The Company provides training on the requirements of the Integrated Standard and on the Ontario Human Rights Code as it relates to people with disabilities. The Company takes steps to ensure that training is provided to all of our employees, volunteers and those persons who develop our policies and provide goods, services or facilities on our behalf, including by:
  - developing and consolidating training materials that address the requirements of the Integrated Standard, including information about achieving certain accessibility standards by 2021 and on the disability-related regulations obligations under the *Human Rights Code*;
  - reviewing the duties of those individuals that require training, and tailoring the training to be appropriate for such duties;
  - scheduling the training such that it is delivered as soon as practicable, including ensuring that new employees are trained as soon as practicable after being hired and that employees are trained when the Company’s accessibility policies materially change;
  - delivering the training via a method that is appropriate for the audience and the needs of the Company; and
  - keeping a record detailing those employees that were trained and when.

At this time, the Company does not self-service utilize kiosks. However, should the use of self-service kiosks become a part of the Company's business in the future, we will ensure that our employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.

### **Information and Communication**

The Company is committed to meeting the communication needs of people with disabilities.

1. The Company ensures that our existing processes for receiving and responding to feedback are accessible to people with disabilities upon request by:
  - providing multiple methods for feedback, such as in writing or via email, telephone or in person; and
  - considering and implementing, as appropriate, those accessible formats or communication supports required elsewhere in the Integrated Standard.
2. The Company ensures that, upon request, it will provide or arrange for the provision of publicly available information that is in respect of our goods, services or facilities in an accessible format and at a cost that is not more than that charged to others by:
  - consulting with the person making the request to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and the Company's capability;
  - providing the accessible format or communication support in a timely manner and at no additional cost; and
  - notifying the public about the availability of accessible formats and communication supports.
3. The Company generally does not make its emergency procedures, plans or public safety information public. However, if the Company does so in the future, it will provide such information in an accessible way, as soon as practicable upon request.
4. The Company met the communication needs of people with disabilities by ensuring that, as of January 1, 2014, any new websites and content on those sites materially conformed with, at a minimum, WCAG 2.0, Level A by:
  - liaising with our Information Technology department to determine whether the website is compliant; and
  - determining whether the Information Technology department can upgrade the website and content internally, or if third party assistance is required.
5. Starting January 1, 2021, the Company has ensured that all websites and content within its control materially conform with WCAG 2.0, Level AA, except for success criteria 1.2.4

Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded), by January 1, 2021, by:

- liaising with our Information Technology department to determine whether the website is compliant; and
  - determining whether the Information Technology department can upgrade the website and content internally, or if third party assistance is required.
6. Additionally, and as noted in Part 1 above, in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities, including any accessible elements in public spaces, we will post a notice that identifies the unavailable facility or service, the reason for the disruption, the expected duration of the disruption, and alternative facilities or emergency services, if available. Information about disruptions will also be posted on the Company's website under "News."

### **Employment**

1. The Company is committed to fair and accessible employment practices. Currently, the Company:
  - notifies the public and our staff that we will make reasonable accommodations for people with disabilities during the recruitment process, either through our website, via a recruiter or the applicable job posting, as applicable;
  - notifies job applicants, when they are individually selected to participate in an assessment or selection process, that reasonable accommodations are available upon request in relation to the materials or processes to be utilized;
  - consults with job applicants who request accommodation to support them through the recruitment, selection and/or assessment process and take into account their needs, so that the accommodations provided are effective; and
  - notifies the successful applicant of the Company's policies for reasonably accommodating our employees with disabilities.
2. Currently, the Company informs our employees of the policies used to support employees with disabilities, including, but not limited to, policies on the provision of reasonable job accommodations that take into account an employee's accessibility needs due to disability, by:
  - consulting with our employees with disabilities to determine those accessible formats or communication supports that may be of assistance, and how such accommodation may be provided; and
  - providing the information as soon as practicable after commencement of employment, and updates whenever there is a change to the policies.

3. Currently, the Company provides individualized workplace emergency response information to our employees with disabilities, if any, if the disability is such that the individualized information is necessary, and the Company is aware of the need for reasonable accommodation. If an employee has a disability and may need help during an emergency, the employee should contact Human Resources.
4. The Company has developed and put in place a process for the creation of individual accommodation plans for those employees that have been absent from work due to a disability. See Exhibit A. This process was implemented by:
  - considering how employees with disabilities will participate in the development of their accommodation plan and what the plans may include;
  - establishing where the plans will be stored and what steps will be taken to protect the privacy of employee information; and
  - determining when and how the individual accommodation plans will be reviewed and updated.
5. The Company has developed and put in place a documented return to work process for those employees that have been absent from work due to a disability and require reasonable disability-related accommodation in order to return to work. This process outlines the steps that the Company will take to facilitate the return to work of the applicable employees and the use of individual documented accommodation plans. See Exhibit A.
6. The Company ensures, and will ensure, that it takes into account the accessibility needs of employees with disabilities (as well as their individual accommodation plans) when implementing its performance management process. This has been, and will be, achieved by:
  - reviewing an individual's accommodation plan to understand their needs and determine whether it should be adjusted to improve job performance;
  - providing performance-management related documents in accessible formats; and
  - providing informal and formal coaching and feedback in a manner that takes in account an employee's disability.
7. The Company takes into account the accessibility needs of its employees with disabilities (as well as their individual accommodation plans) when providing career development, advancement, or redeployment. This occurs through the consideration of what reasonable accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

### **Design of Public Spaces**

The Company may from time to time in Ontario, Canada develop or redevelop certain public spaces, as defined in the Design of Public Spaces Standard. Should it choose to do so, such development (or redevelopment) will be performed in accordance with applicable law. Further, the Company has in place preventative and emergency maintenance procedures with respect to accessible elements, including any in public spaces.

### **Going Forward**

The Company will consider accessibility in all aspects of its business and operations, and will endeavour to identify and remove accessibility barriers going forward.

The Company will review and update this accessibility plan at least once every five years.

### **For More Information:**

For more information on this accessibility policy and plan, please contact the Company's Compliance Counsel at:

- Mail: LAF Canada Company, c/o Fitness International, LLC, 3161 Michelson Drive, Suite 600, Irvine, California 92612, USA; ATTN: Compliance Counsel
- Telephone: 949-255-8200
- Email: [aoda@fitnessintl.com](mailto:aoda@fitnessintl.com)

Accessible formats of this document are available free upon request made to the Company's Compliance Counsel. This document is also posted on LA Fitness's public website.

## Exhibit A

### Individual Accommodation Plan and Return to Work Process

1. If an employee requires a disability-related accommodation (including in the event the employee is requesting an accommodation to return to work after a leave), the employee must call Human Resources to discuss potential reasonable accommodations.
2. When contacted by an employee who requires a disability-related accommodation, Human Resources will aim to accommodate the employee as reasonably as possible by:
  - Contacting the employee to discuss proposed accommodations (the employee requesting accommodation can participate in the development of any individual plan of accommodation by phone, in writing or by email);
  - Consulting with the employee, the employee's managers and the legal department, as necessary, to assess the employee's accommodation needs on an individual basis;
  - Notifying the employee in the event the Company elects to exercise its right to request an evaluation by an outside medical or other expert, at the Company's expense, to determine how reasonable accommodation can be achieved;
  - Permitting the employee's bargaining agent or other representative (if any) to participate in an accommodation plan, if a request to do so is made by the employee to Human Resources;
  - Keeping the employee's personal information confidential in accordance with Company policies and practices, including by restricting access to the employee's personnel files through both physical and technological means;
  - Providing any individual accommodation plan in an accessible format;
  - If requested or required, including in a plan of accommodation: (a) information regarding accessible formats and communication supports provided, (b) individualized workplace emergency response information and (c) any other accommodation measures provided
  - Upon the employee's request, reviewing and updating any accommodation plan will be reviewed and updated; and
  - Notifying the employee by phone or email if an accommodation plan is denied and why.
3. The Company will also take into account any accessibility needs of an employee who has notified the Company of his or her disabilities (and any applicable individual accommodation plan) when conducting any performance management or career development process.