

# **Accessibility Policy and Multi-Year Accessibility Plan for American Eagle Outfitters Canada and aerie**

In 2005, the government of Ontario set the goal of a “barrier-free Ontario” for people with disabilities by creating the *Accessibility for Ontarians with Disabilities Act* (“the Act” or “AODA”). Regulations were created which set out the steps that organizations, including **American Eagle Outfitters Canada and aerie (“American Eagle and aerie”)**, must take to meet this laudable goal. These Regulations cover accessibility standards in customer service, information and communications, employment, transportation and the built environment.

**American Eagle and aerie** are committed to helping Ontario become more accessible. **American Eagle and aerie** have already complied with Regulation 429/07 – Accessibility Standards for Customer Service – by creating internal policies, practices and procedures which recognize the role **American Eagle and aerie** will play in making Ontario more accessible. These initiatives included the creation of a training program for employees on the AODA and how to provide accessible services. **American Eagle and aerie** have also developed a feedback process, via its website ([www.ae.com](http://www.ae.com)) and in hard-copy form available at our stores to help ensure that we maintain our high level of accessibility.

This Multi-Year Accessibility Plan outlines the policies and actions that **American Eagle and aerie** will put and has put in place to comply with the remaining requirements of the *Act*.

## **Statement of Commitment**

**American Eagle and aerie** are committed to improving accessibility for individuals with disabilities. **American Eagle and aerie** are also committed to treating all people in a way that allows them to maintain their dignity and independence. **American Eagle and aerie** will continue to meet the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Act* and its Regulations.

## **Barrier Assessment**

In accordance with AODA and **American Eagle’s and aerie’s** goal of providing an inclusive workplace, this Multi-Year Accessibility Plan seeks to eliminate and prevent barriers to accessibility. Typical barriers experienced by individuals with disabilities include physical, communication and technology, attitudinal and systemic barriers.

## **Accessible Emergency Information**

**American Eagle and aerie** are committed to providing its customers, clients and the general public with publicly available emergency information, in an accessible way, upon request. **American Eagle and aerie** will also provide disabled employees with individualized emergency response information when necessary.

### **Implementation Timeframe:**

Effective immediately and ongoing.

## **Training**

**American Eagle and aerie** will provide training to employees on Ontario's accessibility laws and on the *Human Rights Code* ("the *Code*") as it relates to people with disabilities. Training will be provided in a way that best suits the duties of **American Eagle and aerie** employees.

**American Eagle and aerie** will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws:

- **American Eagle and aerie** will review current training materials to determine whether any existing training materials can be built upon and used for *AODA* training;
- **American Eagle and aerie** will provide Customer Service Training for all employees who deal with members of the public and/or any other third parties (as required by section 6 of the Customer Service Standard, O. Reg. 429/07);
- **American Eagle and aerie** will provide online training materials to explain:
  - (1) The requirements of the accessibility standards referred to in the Integrated Standard, O. Reg. 119/11; and
  - (2) The requirements of the *Code* as it pertains to persons with disabilities (as required by section 7 of the Integrated Standard, O. Reg. 119/11); and,
- **American Eagle and aerie** will post accessibility training materials onto its internal online portal for internal use of all employees;
- **American Eagle and aerie** will continue to provide training as required under *AODA* for all new employees and/or if there is a substantial change to American Eagle's policy.

### **Implementation Timeframe:**

Effective immediately and ongoing.

## Kiosks

**As of January 1, 2019 there are no interactive devices in use. American Eagle and aerie** will take the following steps to ensure employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks:

- **American Eagle's and aerie's** Store Operations and IT departments will be consulted and trained on considering the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.
- Project Management processes will be augmented with accessibility criteria.
- **American Eagle's and aerie's** Store Operations and IT departments will be consulted when procuring self-service kiosks, to ensure that accessibility features will be incorporated into the procurement process.
- Employees will be trained to assist individuals with accessibility features on all self- service kiosks.

## Information and Communications

**American Eagle and aerie** are committed to meeting the communication needs of people with disabilities. We will consult with disabled customers to determine their specific information and communication needs.

**American Eagle and aerie** will take the following steps to make sure all publicly available information is made accessible upon request by **January 1, 2016**:

- **American Eagle and aerie** will provide customers with information in an accessible format, upon request; and,
- **American Eagle and aerie** will respond to such requests as soon as practicable.

**American Eagle and aerie** will take the following steps to make any new website and new web content conform to WCAG 2.0, Level A by **January 1, 2014**:

- all new **American Eagle and aerie** websites will be assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level A;
- all new **American Eagle and aerie** web content will be assessed and evaluated for accessibility conformance;
- if conformance with WCAG 2.0 Level A is an issue, **American Eagle and aerie** will consult with its internal IT department/an external consultant regarding necessary changes to its new website and new web content so as to come into compliance;
- **American Eagle and aerie** will engage services of an external website consultant to implement improvements to its website and web content so as to meet the compliance standards, if its internal IT department is unable to do so;
- **American Eagle and aerie** will review any changes to ensure compliance.

**American Eagle and aerie** will take the following steps to make any public website and web content conform to WCAG 2.0, Level AA by **January 1, 2021**:

- **American Eagle's and aerie's** public website will be assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level A;
- all **American Eagle and aerie** public web content will be assessed and evaluated for accessibility conformance;
- if not in conformance with WCAG 2.0 Level A, **American Eagle and aerie** will consult with its internal IT department/an external consultant regarding necessary changes to bring to the website and web content into compliance;
- engage services of an external website consultant to make improvements of the website and web content, if its internal IT department is unable to make the necessary changes;
- implement necessary improvements to the website and content will be made and revised by **American Eagle and aerie** to ensure compliance.

**Implementation Timeframe:**

By January 1, 2014 and ongoing.

**Feedback**

**American Eagle and aerie** will take the following steps to make ensure existing feedback processes are accessible to people with disabilities upon request by **January 1, 2015**:

- make feedback forms accessible on **American Eagle's and aerie's** website;
- advise customers and clients that feedback can be given in person at our stores, or by mail, by phone or by e-mail:

AE Customer Service  
77 Hot Metal St.  
Pittsburgh, PA  
15203

Telephone - Customer Relations Line: 1-855-468-4333  
E-mail: [www.ae.com](http://www.ae.com) / Email us

- ensure public that supports are available to facilitate the submission of feedback;and,
- commit to responding to feedback as soon as practicable.

**American Eagle and aerie** will take the following steps to make sure all publicly available information is made accessible upon request by **January 1, 2016**:

- **American Eagle and aerie** will provide its customers and members of the public with information in an accessible format upon request.
- **American Eagle and aerie** will respond to such requests as soon as practicable.

**Implementation Timeframe:**

By January 1, 2016 and ongoing.

**Employment**

**American Eagle and aerie** are committed to fair and accessible employment practices.

**American Eagle and aerie** will take the following steps by **January 1, 2016** to notify the public and staff that it will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- include a statement in any job advertisements that **American Eagle and aerie** will hire individuals with disabilities and will provide accommodations during the recruitment process;
- if a job applicant requests accommodation, **American Eagle and aerie** will consult with the individual and make adjustments that best suit his/her needs to the extent required by law;
- confirm, in any interview, that **American Eagle and aerie** will hire individuals with disabilities;
- notify successful applicants of **American Eagle’s and aerie’s** policies for accommodating employees with disabilities in any offer letter;
- include in the **American Eagle and aerie** “New Hire Orientation” training program a section on accessibility and the *Code*, as appropriate;
- advise current employees of the policies on accessibility and the *Code*;
- advise employees when any changes are made to the above policies; and,
- review existing policies and procedures and where necessary, augment processes for people with disabilities.

**American Eagle and aerie** will take the following steps to develop and put in place a process for designing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- review existing policies and procedures and if necessary, augment processes for people with disabilities on the development of accommodation plans and return to work processes.

**American Eagle and aerie** will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if **American Eagle and aerie** uses performance management, career development and redeployment processes:

- review existing policies and procedures amend where necessary.

**American Eagle and aerie** will take the following steps to prevent and remove other accessibility barriers identified:

- assess, review, and alter (if required) policies and procedures to ensure compliance with the *AODA*.

**Implementation Timeframe:**

By January 1, 2016 and ongoing.

**Design of Public Spaces**

**American Eagle and aerie** will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to its facilities in public spaces. Public spaces at **American Eagle and aerie** include:

- Service-related elements like service counters, fixed queuing lines and waiting areas
- Note: Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps and accessible pedestrian signals as well as accessible off street parking are not applicable

**Implementation Timeframe:**

By January 1, 2017 and ongoing.

**Service Disruptions**

**American Eagle and aerie** have put procedures in place to prevent service disruptions to its accessible parts of its public spaces.

In the event of a service disruption, **American Eagle and aerie** will notify the public of the service disruption and alternatives available.

**Implementation Timeframe:**

Effective immediately and ongoing.

**Policy Review**

The Multi-Year Accessibility Plan is a tool for **American Eagle and aerie** to communicate its accessibility initiatives internally and to the public. **American Eagle and aerie** will review and update this Plan at least once every five (5) years. Dates of compliance will be maintained in a separate spread sheet. The first version of this Plan was reviewed on **January 1, 2019**. The next review is scheduled for January, 2024.

**Implementation Timeframe:**

By January 1, 2019 and ongoing.

**For more information**

For more information on this accessibility plan, please contact Nicole Moose at:

- Telephone: 570-710-6252
- Email: [moosen@ae.com](mailto:moosen@ae.com)

Please note accessible formats of this Multi-Year Plan are available free upon request to our Customer Relations Line: 1-855-468-4333.