ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi-Year Plan

The company maintains ongoing processes to review and update this Multi-Year Accessibility Plan and to ensure that it is implemented in compliance with the Accessibility for Ontarians with Disabilities Act, 2005.

Part I – GENERAL REQUIREMENTS

Section	Initiative	Accessibility Requirement	Action	Status
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation.	- The company has developed and implemented an Integrated Accessibility Standards (IASR) Policy specific to the organization. - This policy is publicly available and will be made available in accessible format where requested.	Completed, with processes in place for ongoing compliance
4	Accessibility Plans	4.(1) Large organizations shall, a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years.	- Plan has been created and will be updated as needed. - Posted to website as per legislation.	Completed, with processes in place for ongoing compliance

Section	Initiative	Description	Action	Status
7	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	- Employees will be provided with a review of all applicable AODA policies and appropriate training as it relates to their specific roles upon hire.	Completed, with processes in place for ongoing compliance

PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	- Customers and the public may submit their feedback or inquiry through the company Feedback Form. - Feedback and requests will be handled on a case-by-case basis.	Ongoing, with processes in place for ongoing compliance
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons. 12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	- The company will consult with the person to determine their accessibility needs and arrange for a suitable and alternative format/communication support in a timely manner. The request will be facilitated through the department in which it affects (e.g. sales, customer service, etc.). - The company will explore and assess suitable options following consultation with the individual to determine their needs. - Requests will be handled on a case-by-case basis.	Ongoing, with processes in place for ongoing compliance

12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	- The policy and our plan have been posted on the company website which notifies the public about the availability of accessible formats and communication supports.	Completed, with processes in place for ongoing compliance
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites 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, and shall do so in accordance with the schedule set out in this section.	- Internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and WCAG 2.0 Level AA (excluding live captioning and audio description). - The company continues to actively assess accessibility of existing website organization and content.	Completed, with processes in place for on-going compliance

PART III – Employment Standard

Section	Initiative	Description	Action	Status
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	- The company has an accessibility statement included on job postings notifying potential applicants of our commitment to provide suitable accommodation to candidates taking part in all aspects of the selection process, upon request.	Completed, with processes in place for on-going compliance
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.	- Upon initial contact, the selected applicant will be informed that accommodations are available as it relates to the materials or processes to be used. - The company will work with the selected applicant to provide an acceptable alternative where possible. - Requests will be handled by Human Resources and hiring managers as needed.	Completed, with processes in place for on-going compliance
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	- Notification will be provided to all new hires as part of their orientation package.	Completed, with processes in place for on-going compliance

25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. 25.(3)Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	- The company will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment. - All changes will be communicated to employees. The updated policies will be posted on the company Intranet.	Completed, with processes in place for on-going compliance

26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.	- In determining the suitability of an accessible format or communication support, the company will consult with the employee making the request. - Prior to providing the information needed to perform one's job or information generally available in the workplace, employees requiring accessible formats or communication supports will be requested to notify Human Resources so that alternate arrangements may be made. - Upon receiving a request, Human Resources will work with the employee and any individuals responsible for providing the information (e.g. the employee's manager or supervisor) to deliver a suitable accessible format or communication support.	Completed, with processes in place for on-going compliance

Section	Initiative	Description	Action	Status
27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	- Where an employee discloses a disability such that the individualized information is necessary, the company will share emergency information with the employee and determine the most appropriate and effective workplace. response during an emergency - Manager and HSE Manager to handle on case-by-case basis.	Completed, with processes in place for on-going compliance
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	- Where individualized emergency response information is required for an employee and the employee requires assistance, the company will obtain the employee's consent to only share the emergency information with the individual(s) who will help them. The details of the employee's medical condition or disability will remain confidential. - Manager and HSE Manager to handle on case-by-case basis.	Completed, with processes in place for on-going compliance

27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	- The process for providing emergency information will include alternative formats where needed and will be completed in a timely manner upon receipt of the request or becoming aware of the need for an individualized plan. - Manager and HSE Manager to handle on case-by-case basis.	Completed, with processes in place for on-going compliance
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	- The emergency information will be reviewed with the employee if they move to another work location, if their accommodation needs change or when emergency response procedures change. - Manager and HSE Manager to handle on case-by-case basis.	Completed, with processes in place for on-going compliance
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	- Accommodation plans to be determined on a case-by-case basis taking into consideration the employee's disability and need for accommodation.	Completed, with processes in place for on-going compliance

28		28 (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee's personal. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.	- When the need for an accommodation is recognized, information will be collected on the employee's functional abilities to help determine if/how the employee's needs can be accommodated. - Employees requesting individual accommodation plans may participate in the development of the plan. - After identifying the most appropriate accommodation(s), the details will be documented in a written plan in accordance with the requirements of the IASR, including but not limited to: 1) what accommodation(s) will be provided; 2) how to make information accessible to the employee including accessible formats and communication supports; 3) employee emergency information and/or emergency response plan (if applicable); 4) when the plan will be reviewed and updated. - The employee will be provided with a copy of the individual accommodation plan in an accessible format (if requested), or written reasons for denying accommodation. - The frequency with which the accommodation plan will be reviewed and updated will be agreed upon. If the accommodation is no longer appropriate, the situation will be reassessed and the plan will be updated. - The accommodation plan will also be reviewed and updated if the employee's work location or position changes, or if the nature of the employee's disability changes.	Completed, with processes in place for on-going compliance

Section	Initiative	Description	Action	Status
29	Return to Work Process	29.(1) Every employer, other than an employer that is a small organization, (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and (b) shall document the process. (2) The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and (b) use individual documented accommodation plans, as described in section 28, as part of the process.	- The company maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. - After identifying the most appropriate accommodation, the company will implement use of individual documented return to work plans for non-occupational illnesses, injuries or disabilities.	Completed, with processes in place for on-going compliance
30	Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	- Where applicable, the company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management. - Manager and Human Resources to handle on a case-by-case basis.	Completed, with processes in place for on-going compliance

31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	- Where applicable, the company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when providing career development and advancement to employees. - Manager and Human Resources to handle on a case-by-case basis.	Completed, with processes in place for on-going compliance
32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	- As part of the redeployment process, the company will incorporate the accessibility needs and accommodation plans of any employee that is being redeployed to an alternate position and/or department. Human Resources will oversee the redeployment process; however, new and/or amended reporting hierarchies will be reviewed to determine who is to be involved with and informed of any accessibility plans and requirements.	Completed, with processes in place for on-going compliance