

ACCESSIBILITY POLICY AND MULTI-YEAR ACCESSIBILITY PLAN

SUBJECT: Accessibility Policy and Multi-Year accessibility Plan	DISTRIBUTION: All Divisions	AUTHORIZATION: Mike Kirchmair, Chief Financial Officer
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This multi-year accessibility plan and policy outlines the policies and actions that Great Gulf Group of Companies has in place and continues to take such actions to improve opportunities for people with disabilities.

Statement of Commitment

Great Gulf Group of Companies is committed to treating people with disabilities in a manner that respects their dignity and independence and to ensuring equal access and participation for people with disabilities. We are committed to doing so by preventing and removing barriers to accessibility and provide alternative ways to meet the accessibility needs of persons with disabilities in a timely manner. Great Gulf Group of Companies is committed to continuing to ensure our organization is compliant in accordance with Accessibility for Ontarians with Disabilities Act, 2005 ("AODA"), the Integrated Accessibility Standards, Ontario Regulation 191/11 ("IASR") and the Human Rights Code, R.S.O. 1990, c. H.19 ("HRC") as it pertains to people with disabilities.

Training

Great Gulf Group of Companies will continue to train employees, volunteers, and other persons on Ontario's IASR and on HRC as it relates to people with disabilities. Training will be appropriate to the duties of employees, volunteers, and other staff and as soon as practicable.

Action:

- Great Gulf Group of Companies will determine and ensure that appropriate training on the requirements of the IASR and HRC as it pertains to persons with disabilities, is provided to:
 - all employees or volunteers;
 - persons participating in the development and approval of Great Gulf Group of Companies' policies; and
 - other persons who provide goods, services and facilities on Great Gulf Group of Companies' behalf;
- Training will form part of new hire onboarding process;
- Training is available on an as-needed basis, as requested;
- Training will be tracked and recorded and records will be maintained on an on-going basis
- Great Gulf Group of Companies will continue to provide training in respect of any changes to its current customer service policies on an ongoing basis.

Required legislative compliance: January 1, 2015

Status: Completed and on-going

Kiosks

Great Gulf Group of Companies will continue to consider accessibility requirements when obtaining designing, procuring or acquiring self-service interactive electronic terminals for public use in Ontario that allows users to access services or products by advising affected employees to review accessibility requirements with the supplier, as required.

Required legislative compliance: January 1, 2014

Status: Completed and on-going

Information and Communication

Great Gulf Group of Companies continues to provide or arrange, upon request, the provision of accessible formats and communication supports to people with disabilities in a timely manner and that takes into account their disability and at a cost that is no more than the regular cost charged to other persons. Great Gulf Group of Companies will continue to consult with the person making such request to determine the suitability of an accessibility format or communication support. Great Gulf Group of Companies will also continue to notify the public about the availability of accessible formats and communication supports and will make available on its website a form to request such accessible formats. Great Gulf Group of Companies staff who receive such requests for accessible formats will be trained on how to manage requests and assist in obtaining accessible formats.

Accessible Emergency & Safety Information

In the event Great Gulf Group of Companies prepares emergency procedures, plans or public safety information and such information is made public, Great Gulf Group of Companies is committed to providing such information in an accessible format or with appropriate communication supports, as soon as practicable, upon request. Great Gulf Group of Companies will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and Great Gulf Group of Companies is aware of the need for accommodation due to the employee's disability.

Action:

- Great Gulf Group of Companies will continue to inform employees that Great Gulf Group of Companies is committed to providing accessible emergency response information as required and will continue to determine whether any new or current employees require same;
- Fire, safety and emergency response information that is publicly available, is available in accessible formats or with appropriate communication supports, upon request.

Required legislative compliance: January 1, 2012

Status: Completed and on-going

Feedback, Accessible Formats and Communication Supports

Great Gulf Group of Companies continues to be committed to ensuring that individuals with disabilities have the ability to access our feedback process.

Action:

- Great Gulf Group of Companies will continue to provide and/or arrange for the provision of accessible formats of information and communication supports as requested;
- Great Gulf Group of Companies will continue to consult with persons making information and/or communication support requests to determine the suitability of the accessible format and/or communication support;
- Great Gulf Group of Companies will continue to ensure feedback, accessible formats and/or any communication support(s) requested are available in more accessible formats upon request by individuals with disabilities and at a cost no more than the regular cost charged to other persons;
- Feedback forms and Alternative Format Request forms are available in an accessible format, taking the person's disability needs into account, upon request;
- Great Gulf Group of Companies will respond to the feedback in a timely manner and in an accessible format.

Required legislative compliance: January 1, 2015

Status: Completed and on-going

Accessible Websites and Website Content

Great Gulf Group of Companies continues to be committed to making publicly available information accessible upon request. Great Gulf Group of Companies' website and web content conform with WCAG 2.0 Level AA.

Required legislative compliance: January 1, 2021

Status: Completed

Employment

Great Gulf Group of Companies is committed to ensuring our employment practices are fair and accessible by removing any barrier that prevents or hinders the recruitment process. We will also ensure the accessibility needs of employees with disabilities are taken into account if or when using performance management, career development and redeployment processes.

Action:

- Recruitment:
 - potential candidates, employees, staff and the public are notified via our website, in job postings or verbally that Great Gulf Group of Companies accommodates people with disabilities during the recruitment and assessment process;
 - applicants are notified when they are selected for an interview that accessible accommodation can be provided, accommodations are available upon request in relation to the materials or processes to be used;
 - Great Gulf Group of Companies shall consult with the applicant to arrange suitable accessible accommodation taking into account the applicants accessibility needs;
 - When Great Gulf Group of Companies notifies the successful applicant of its policies for accommodating employees with disabilities when making offers of employment.

- Informing Employees of Supports and Accessible Formats:
 - Great Gulf Group of Companies will inform its new and existing employees of its policies, and any changes to same, used to support employees with disabilities, including, job accommodations taking into account the employee's accessibility needs;
 - Great Gulf Group of Companies will provide accessible workplace information to employees and staff upon request via email and on its intranet and is available in accessible formats upon request;
 - Great Gulf Group of Companies will consult with employees with disabilities when requested, to provide accessible formats and communication supports for information required to assist employees perform their job and that is generally available to employees in the workplace.
- Workplace Emergency Response Information:
 - Individualized workplace emergency response information is available for employees who have a disability, who have disclosed an accessibility need and/or who have requested it as soon as practicable;
 - Great Gulf Group of Companies will continue to review individualized workplace emergency response processes when individual accommodation/needs change, if/when employee relocates inter-company, and when Great Gulf Group of Companies will generally review and/or update its general emergency response policy.
- Individual Accommodation Plans:
 - Great Gulf Group of Companies will develop individual accommodation plans for employees with disabilities in a format that takes into account the employee's accessibility needs due to disability, which process shall include:
 - The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
 - The means by which the employee is assessed on an individual basis.
 - The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
 - 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.
 - The steps taken to protect the privacy of the employee's personal information.
 - 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 employee.
 - The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability;
 - Great Gulf Group of Companies will ensure Individual accommodation plans shall:
 - include any information regarding accessible formats and communications supports provided, if requested;
 - include individualized workplace emergency response information, as described, if required; and
 - identify any other accommodation that is to be provided.

- Great Gulf Group of Companies will continue to ensure when providing performance management, career development or advancement and/or redeployment, Great Gulf Group of Companies shall take into account the accessibility needs of the employee with disabilities and any individual accommodation plan.
- **Return to Work:**
 - Great Gulf Group of Companies has established and will continue to implement and improve plans and processes in place for employees absent from work due to a disability and require disability-related individual accommodation plans and/or return to work plans where appropriate; The return to work process shall,
 - 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
 - use documented individual accommodation plans as part of the process.

Required legislative compliance: January 1, 2016

Status: Completed and on-going

Design of Public Spaces

Great Gulf Group of Companies will continue to meet its AODA requirements with respect to the design of public spaces in the event we newly construct or redevelop any public space on or after January 1, 2017.

Action:

- Great Gulf Group of Companies will continue to ensure the requirements under the Design of Public Spaces Standards (Accessibility Standards for Built Environment) are followed by any parties involved internally and any third parties requested to construct or redevelop any public space

Required legislative compliance: January 1, 2017

Status: Completed and on-going

* Accessible formats of this information are available for free upon request.