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Accessibility Multi-Year Plan and Policy

Introduction and Statement of Commitment

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA), which requires that Ontario be fully accessible to those with disabilities by 2025.

The Accessibility Multi-Year Plan and Policy ensures that Pomerleau, Inc. is compliant with the Customer Service and Integrated Accessibility Standards Regulation (IASR) associated with the act. This plan will be reviewed and updated at least once every five (5) years, or sooner as required.

Pomerleau is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence, and we are committed to meeting their needs in a timely manner.

We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the AODA and Ontario's accessibility laws.

Scope

This policy applies to employees of Pomerleau's offices in Ontario.

Definitions

Disability

In accordance with Human Rights legislation, a disability is defined as follows:

- Any degree of physical disability, infirmity, malformation or disfiguration caused by bodily injury, birth defect or illness and includes but is not limited to:
 - Diabetes mellitus:
 - Epilepsy;
 - A brain injury;
 - Any degree of paralysis;
 - Amputation;
 - Lack of physical coordination;
 - Blindness or visual impediment;
 - Deafness or hearing impediment;

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- Muteness or speech impediment or;
- Physical reliance of a guide dog or other service animal, or on a wheelchair or other remedial appliance or device.
- A condition of mental impairment or a developmental disability;
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder or:
- An injury or disability for which benefits were claimed or received under the insurance planestablished under the Workplace Safety and Insurance Act, 1997.

If there are additional inclusions the Company will immediately recognize the inclusions under the various provincial Human Rights Codes or legislation.

Barrier

A barrier is anything that prevents a person with a disability from fully taking part in society because of that disability. Some barriers include:

- Physical barriers (e.g. a step at the entrance to the building or a door that is too heavy to be openedby an individual with limited upper body mobility and strength);
- Architectural barriers (e.g. a hallway or door that is too narrow for a wheelchair or scooter);
- Information or communication barriers (e.g. a publication that is not available in large print for people with visual impairment);
- Attitudinal barriers (e.g. ignoring a customer in a wheelchair; assuming people with a disability cannot perform a certain task when in fact they can);
- Technological barriers (e.g. a website that is not accessible for people who require the use of screen readers);
- Barriers created by policies or practices (e.g. not allowing animals on the premises; excluding or removing individuals who require the use of service animals).

Training

We are committed to training staff in Ontario's accessibility laws and aspects of the Ontario Human Rights Code (OHRC) that relate to persons with disabilities. To this end, we will continue to:

- Train employees on the requirements of the IASR and other disability-related obligations as they are under OHRC legislation.
- Maintain records of the dates when training is completed and the individuals who completed the training.
- Train new employees in Ontario within three months of employment. Employees will also be trained should any changes be made to the plan or legislation.



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Information and Communications

We will always communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports. Furthermore, to support individuals with disabilities in accordance with the law, we will continue to:

- Ensure all public content meet Web Content Accessibility Guidelines (WCAG) 2.0 AA website requirements;
- Have a statement on our website about the availability of accessible formats and communication supports and, upon request, provide or arrange for the provision of accessible formats in a timely manner;
- Ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Feedback, complaints or questions on our processes, plan, and policy, and requests for accommodation can be sent to Human Resources via:

Email: AODA@pomerleau.ca

Fax: (416) 207-9636

Mail: Attn: Human Resources, 185 The West Mall, Suite 1100, Toronto, ON, M9C 5L5, CANADA

Phone: (416) 207-0848 #6044

Employment

Recruitment

With regards to accommodation in the recruitment process, we will continue to:

- Specify in job postings, in recruitment materials, and with regards to interviews, assessments, and testing, that accommodation is available for applicants with disabilities
- When making offers of employment, notify successful applicants of policies for accommodating employees with disabilities.
- Include information about this policy in training provided to employees, and to provide this information to new employees as soon as practicable after hiring.
- Provide updated information on accommodations policies to employees when changes occur.
- Consult with employees and candidates to determine the suitability of a format or support.

Documented Individual Accommodation Plans / Return to Work Process

Pomerleau works with a third-party insurance provider to facilitate the return to work process. This process includes documentation of any adjustments to duties or the work environment that are related to an individual's disability status. An employee may also request accommodation at any time to initiate the process of creating an individual accommodation plan. As pertains to the return to work process and the



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documentation of individual accommodation plans, we commit to:

- Ensuring participation of the employee requiring the individual accommodation plan.
- Requesting outside medical evaluation to determine if accommodation can be achieved and what supports are needed.
- Ensuring a high level of privacy.
- Conducting regular reviews and making updates as needed. Providing reason for denial if applicable.
- Providing Individual Accommodation Plans in a format that takes into account the needs of the employee.
- And if required, including individualized workplace emergency response information.

Performance Management, Career Development & Redeployment

Any activity related to performance management, career development and advancement, or redeployment will support the accessibility needs of employees with disabilities by taking into account individual accommodation plans.

Changes to existing policies

We will modify or remove an existing policy that does not respect and promote the dignity and independence of people with disabilities.

Responsibility

- Executive Vice-President, Talent, Culture and Leadership: Responsible for ensuring the implementation of the policy, training, and compliance to it.
- Each employee has a responsibility to abide by the terms of this Policy

