

Multi-year Plan/Accessibility Policy 2024

(Updated May 2024)

As part of Peto MacCallum's (PML) commitment to accessibility, our multi-year accessibility plan outlines our strategy and the actions that have been and will be implemented to prevent and remove barriers and to meet the requirements under the Accessibilities for Ontarians with Disabilities Act (AODA). This evolving plan will be updated at least once every five years.

Our multi-year accessibility plan focuses on our initiatives in respect of the AODA's Accessibility Standards including:

- Information and Communications
- Employment
- Policies and training
- Design of Public Spaces
- Customer Service
- Feedback

Information and Communication

In accordance with the AODA's Information and Communication Standard, PML has:

- Ensured internet websites and web content conform with Level A of the World Wide Web Consortium Content Accessibility Guidelines (WCAG) 2.0 by 1 January 2014. (Completed in 2013)
- Ensured PML notifies the public and provides, on request, accessible formats and supports for people with disabilities in a timely manner and at no additional cost to others by 1 January 2016. (Completed in 2015)
- Ensured conformation with Level AA of the WCAG 2.0 as required by the standard by 1 January 2021. (Completed in 2020)

Employment

PML is committed to fair and accessible employment practices.

In accordance with the **AODA's Employment Standards**, PML ensures inclusiveness of its employment processes for recruitment, retention and development, including:

- Provision of accessible formats and communication supports that take into account an employee's accessibility needs
- Taking employees' disabilities and accommodation needs into account in respect of the recruitment process, assessment & selection process besides performance management and career development while in employment.
- Inform its employees of the policies and any updates used to support employees with disabilities, including policies on the provision of jobs accommodations that take into account an employee's accessibility needs due to disability. The new employee welcome package includes this information.
- Maintain a written process for the development of documented **individual accommodation plans for employees with disabilities**.

- The process for the development of documented individual accommodation plans will include the following elements:
 - The employee requesting accommodation will be able to participate in the development of the individual accommodation plan and will be assessed on an individual basis.
 - The employee may ask a bargaining agent or other workplace representative to participate in the process.
 - PML reserves the right to request an evaluation by an outside medical or other expert, at our expense, to assist the Company in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
 - All necessary steps will be taken to protect the employee's personal information.
 - The manager will give the employee in an accessible format (if required), a copy of the individual accommodation plan.
- In addition, the plans will include individualized workplace emergency response information (where required) and identify any other accommodation that is to be provided.
- Individual accommodation plans will be reviewed when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when PML reviews its general emergency response policies.
- If an employee's request for a documented individual accommodation plan is denied, the following steps will be followed:
 - A detailed letter from the Vice President (Administration) outlining the reasons for denial will be presented to the employee in a reasonable amount of time.
 - This letter and all pertinent documentation will be stored in the employee's personnel file.
- Individual accommodation plans shall, if requested, include any information regarding accessible formats and communication supports provided.
- PML will develop and provide appropriate training to managers and colleagues responsible for supporting the individual accommodation process.
- Provision of **individualized workplace emergency response information** to employees with a disability, if the disability is such that the individualized information is necessary and PML is aware of the need for accommodation due to the employee's disability. PML will provide this information as soon as practicable after becoming aware of the need for accommodation.
 - Where the employee requires assistance, PML will, with the consent of the employee, provide the workplace emergency response information to the person designated by PML to provide assistance to the employee.
 - PML will review the individualized workplace emergency response information when the employee moves to a different location in the company, when the employee's overall accommodation needs or plans are reviewed and when PML reviews its general emergency response policies.
 - The process of development of documented individual emergency plans will include the following elements:

- The employee requesting the accommodation will be able to participate in the development of the individual accommodation plan and will be assessed on an individual basis.
 - PML reserves the right to request an evaluation by and outside medical or competent expert, at its expense, to assist the company in determining if accommodation can be achieved and if so, how accommodation can be achieved.
 - All necessary steps will be taken to protect the employee's personal information.
- Ensuring processes are in place to support employee workplace accommodation requests following absences from work due to a disability.
 - The **return-to-work process** will outline the steps PML will take to facilitate the return to work and document individual accommodation plans as a part of the process.
 - The employee and manager will work together to share information (gathering process) and find the most appropriate accommodation. To this end,
 - The manager would
 - Provide information on return to work
 - Find resolutions to any problem/problems with treatment (if requested)
 - Maintain contact with the employee
 - Ensure work practices are safe for returning employee
 - Provide assistance with identifying accommodations
 - Assist with analyzing the demands of each job task
 - The employee would
 - Get and follow appropriate medical treatment
 - Provide updates about progress, including their functional ability to perform the job.
 - Share with their health care provider with the return-to-work information
 - Other participants, in the process, would include health care provider/providers, union/workplace representative/representatives, and health & safety professional/professionals
 - Upon identifying the most appropriate accommodation, safety considerations and any transitional measure, develop the details in a written return to work plan.
 - Based on the situation, the employee may:
 - Return to the original position
 - Return to the original position with accommodation/accommodations on a temporary or permanent basis.
 - Return to an alternative position on a temporary or permanent basis
 - The return-to-work plan should be attached to the employee's individual accommodation plan.

- Regular review of the return-to-work plan after implementation by the manager and the employee would have to be done to ensure that it remains effective. When accommodation is no longer appropriate, they would reassess the situation by gathering relevant information and update the plan as may be necessary.
- This return to work will not replace or override any other return to work process created by or under any other statute (example, The Workplace Safety Insurance Act 1997)

Policies and Training

PML has and will continue to implement policies and practices and training initiatives in accordance with the AODA by taking the following steps:

- Implementing a policy outlining our commitment to accessibility for clients (implemented 1 January 2012)
- Training for our people on accessibility in the provision of services to our clients (implemented 1 January 2012)
- Implementing a statement of our organization's commitment to meet the accessibility needs of persons with disabilities in a timely manner and in compliance with the AODA's Integrated Accessibility Standards (implemented as of 1 January 2014)
- Training for our people on accessibility standards and human rights legislation, as it pertains to people with disabilities (implemented as of 1 January 2015)

Training will be provided in a way that best suits the nature of our people's work.

PML will ensure training is ongoing when new employees join the company by including it in their welcome package and making it mandatory before they start working.

Design of Public Spaces

As of May 2024, PML does not have any plans for new construction or significant redevelopment of its owned Ontario offices to which the Design of Public Spaces Standard of the Integrated Accessibility Standards Regulation is applicable.

For any future plans on owned premises to which this Standard would be applicable, PML will

- Review possible architectural and physical barriers within the premises
- Work with external consultants & persons with disabilities to suggest and implement solutions to improve identified areas with barriers to accessibilities
- Comply with the required responsibilities under this Standard

PML will also put in place procedures to prevent service disruption to accessible elements of its public spaces as required under the Design of Public Spaces Standard. In the event of a service disruption affecting these accessible elements, PML will notify the public of such service disruption and any available alternatives.

Customer Service

PML's Accessible Customer Service Policy reiterates PML's commitment to providing services to people with disabilities that respect their dignity, independence and rights of equal opportunity and access.

All persons with disabilities are permitted to use assistive devices, service animals and support persons. Requests for accommodation will be reviewed on a case-by-case basis and every effort will be made to accommodate such requests.

Notice will be provided, when it is known, that there will be disruption with facilities or services on which people with disabilities rely.

Policies, practices and procedures related to providing accessible services will be available to the public upon request.

PML will endeavor to ensure its documents or the content of its documentation are made accessible through an alternate format, provided upon request and accommodating individual needs.

PML achieved compliance with the AODA's Customer Service Standard by 1 January 2012.

PML submitted its annual report confirming compliance with this standard as of 31 December 2012 and will continue to ensure compliance with the Accessible Customer Service Standard.

Feedback

Receiving feedback from our employees, clients and the public is an important part of our commitment to accessibility. Details are available on our website, as well as in our Commitment to Accessibility Policy on www.petomacallum.com. We will continue to monitor and respond to feedback promptly.

For more information on this accessibility plan, please contact us:

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Accessible formats of this document are available free upon request.