

#### Intent:

Emterra Group ("Emterra") has implemented an AODA Integrated Multi-Year Accessibility Plan outlining the policies and actions that we will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the Integrated Accessibility Standards, Ontario Regulation 191/11 set forth under the Accessibility for Ontarians with Disabilities Act, 2005.

#### **Statement of Commitment:**

Emterra is committed to providing a barrier-free environment for all stakeholders including residents, our customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005) and its associated standards and regulations.

Emterra understands that we have a responsibility for ensuring a safe, dignified and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training and best practices. In addition we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is shared effort, and as an organization, Emterra is committed to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans and training programs, please contact Emterra at any time.

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# PART I – General Requirements Requirement Description Action Status

Requirement	Description	Action	Status	Compliance
				Date
Establishment of Policies, Practices and Procedures	Every provider of goods or services shall establish policies, practices and procedures governing the provision of its goods and services for persons with disabilities. These must be consistent with the principles of dignity, independence; integrated provisions of services and equal opportunity, deal with the use of assistive devices allow the use of support persons and allow the use of service animals.	Emterra Group has an "Accessibility Standards for Customer Service Policy" that incorporates the requirements. These documents are available to the public and available in alternative formats by request.	Complete	January 1, 2012
Notice of temporary disruptions	If, in order to obtain, use, or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the provider and if there is a temporary disruption in those facilities or services in who or in part, the provider shall give notice of the disruption to the public.	Emterra Group has a process whereby it notifies any of its customers of any planned interruptions and to provide the customer with an estimated restoration time via notation on its website, customer service representatives and any means to meet its accessibility requirements for persons with disabilities.	Complete	January 1, 2012
Training for Staff	Every provider of goods or services shall ensure that their employees that deal with customers, suppliers, contractors, etc. receive training about the provision of its goods and services to persons with disabilities.	Emterra Group has a Mandatory Training Course that is taken by staff upon hiring and as required.	Ongoing. As new staff are hired, training is conducted.	January 1, 2012



Feedback Process for	Every provider of goods or services shall establish	The feedback process permits persons to	Complete	January 1, 2012
Providers of Goods	a process for receiving and responding to	provide their feedback in person, by		
or Services	feedback about the manner in which it provides	telephone, in writing or by email.		
	goods or services to persons with disabilities and			
	shall make information about the process readily			
	available to the public.			
Notice of Availability	Every designated public sector organization and	Posted on Emterra Group's website under	Complete	January 1, 2012
of Documents	every other provider of goods and services that	AODA		
	has at least 20 employees in Ontario shall notify			
	persons to who it provides goods or services that			
	the documents required by this Regulation are			
	available upon request.			
Establishment of	Every obligated organization shall develop,	Emterra Group has an Integrated Accessibility	Complete	January 1, 2014
Accessibility Policies	implement and maintain policies governing how	Standards Policy that is available to the public		
	the organization achieves or will achieve	in accessible formats upon request. The		
	accessibility through meetings its requirements	Policy includes Emterra Group's commitment		
	under the accessibilities standards referred to in	to meet the accessibility needs of persons		
	this Regulation.	with disabilities.		
Accessibility Plans	Large organizations shall,	Emterra Group's Multi-Year Accessibility Plan	Complete and	January 1, 2014
	(a) Establish, implement, maintain and	is available on Emterra Group's website.	ongoing.	
	document a multi-year accessibility plan,			
	which outlines the organization's	The plan will be reviewed every five years, or		
	strategy to prevent and remove barriers	sooner, as required.		
	and meets 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.		

#### **PART II – Information and Communications Standards**

Requirement	Description	Action	Status	Compliance Date
Feedback	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.	The feedback process permits persons with disabilities to provide their feedback.	Complete	January 1, 2015
Accessible Formats and Communications Support	Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communications support 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 changed to other persons.  The obligated organization shall consult with the person making the request in determining the	Emterra Group commits that it will provide persons with disabilities information about its goods and services in a manner that takes into account the person's disability at no extra cost upon request.  Emterra has established a business relationship with Ontario Interpreting Services at the Canadian Hearing Society <a href="https://www.chs.ca/services/ontario-interpreting-services">https://www.chs.ca/services/ontario-interpreting-services</a> to assist with customers that are deaf, deaf-blind or hearing impaired to handle accessibility for customers with	Complete	January 1, 2016



	suitability of an accessible format or communication support.			
	Every obligated organization shall notify the public about the availability of accessible formats and communications supports.			
Accessible Websites and Web Content	Organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines.	Internet website has been reviewed and an audit has been completed to ensure compliance.	Completed - ongoing	January 1, 2021
		Ongoing improvements will continue.		

#### PART III – Employment Standards

Requirement	Description	Action	Status	Compliance Date
Recruitment – General	Every employer shall notify its employees and the public about the available of accommodation for applicants with disabilities in its recruitment process.	External website and internal website updated to notify employees and the public of availability of accommodation.  Career site has been updated to notify applicants and the public of availability of accommodation upon request.  Every Ontario job posting advises applicants that accommodation is available upon request.	Complete	January 1, 2016



Recruitment,	During a recruitment process, an employer shall	Correspondence or notification to applicants	Complete	January 1, 2016
Assessment or Selection Process	notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are	selected for interviews or further assessment include availability of accommodation.		
	available upon request in relation to the materials or processes to be used.	Suitable accommodation will be discussed with a selected applicant, upon request.		
	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.			
Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Offer letters are updated to address this requirement.	Complete	January 1, 2016
Informing Employees of Supports	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.	Employees will be informed of any changes to relevant policies.	Ongoing – when relevant policies change employees will be updated.	January 1, 2016
	Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.			



	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 a disability.			
Accessible Formats and Communication Supports for Employees	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.  The employer shall consult with the employee making the request in determining the suitability for an accessible format or communication support.	Policies and processes have been amended to incorporate these requirements. If an employee raises that he/she has disability, Emterra Group will ensure accommodation is provided, upon request.	Complete and ongoing as needed.	January 1, 2016
Workplace Emergency Response Information	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.	Emterra Group has a process in place for providing individualized emergency response information.	Complete	January 1, 2012



	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.			
	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.			
	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.			
Documented Individual Accommodation Plans	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	Emterra Group's Accommodation for People with Disabilities Policy and Program, Return to Work Policy/Program and associated processes deal with these individual accommodation plan requirements.	Complete	January 1, 2016



	The process for the development of documented	
	individual accommodation plans shall include the	
	following elements:	
	(a) The manner in which an employee	
	requesting accommodation can	
	participate in the development of the	
	individual accommodation plan.	
	(b) The means by which the employee is	
	assessed on an individual basis.	
	(c) 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.	
	(d) 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.  (e) The steps taken to protect the privacy of	
	the employee's personal information.	
	(f) The frequency with which the individual	
	accommodation plan will be reviewed	
1	accommodation plan will be reviewed	



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	and updated and the manner in which it			
	will be done.			
	(g) If an individual accommodation plan is denied, the manner in which the reasons			
	for denial will be provided to the			
	employee.			
	(h) The means of providing the individual			
	accommodate plan in a format that takes			
	into account the employee's accessibility			
	needs due to disability.			
	Individual accommodation plans shall:			
	(a) if requested, include any information			
	regarding accessible formats and			
	communications supports provided, as			
	described in "Accessible formats and			
	Communication Supports for Employees";			
	(b) if required, include individualized			
	workplace emergency response			
	information, as described in the section			
	"Workplace Emergency Response			
	Information"; and			
	(c) identify any other accommodation that is			
	to be provided.			
Return to Work	Every employer, other than an employer that is a	Emterra Group has a return to work	Complete	January 1, 2016
Process/Program	small organization,	process/program for employees that require		
	(a) shall develop and have in place a return	accommodation due to a disability.		
	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.  The return to work process shall,			
	<ul> <li>(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</li> <li>(b) use individual documented accommodation plans, as described in the section "Documented Individual Accommodation Plans", as part of the process</li> </ul>			
	The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.			
Performance Management	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 providing career development and advancement to is employees with disabilities.	Emterra Group's Performance Management Program has been amended to incorporate these requirements.	Complete	January 1, 2016



Career Development and Advancement	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.	Any developmental plans or advancement opportunities will accommodate employees with disabilities.	Complete	January 1, 2016
Redeployment	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.	Redeployment is used or will be used for represented union staff and the collective agreements, when renegotiated, will incorporate that accessibility needs are considered when placement arises from redeployment.	Complete	January 1 ,2016