ACCESSIBILITY POLICY

1. PURPOSE

Ellwood Construction (the Company) is committed to fostering an inclusive and accessible workplace and providing an environment where employees, applicants, customers, contractors, suppliers, visitors, and members of the public are treated with dignity, independence, integration, and equal opportunity.

The Company is committed to identifying, removing, and preventing barriers for persons with disabilities and meeting its obligations under the *Accessibility for Ontarians with Disabilities Act*, 2005 (AODA), the I*ntegrated Accessibility Standards Regulation* (IASR), and the Ontario Human Rights Code.

This policy establishes the Company's commitment to accessibility and provides the framework for achieving compliance with applicable accessibility legislation.

2. SCOPE

This policy applies to all employees, volunteers (where applicable), students, contractors, and to any individual or organization that provides goods, services, or facilities on behalf of Ellwood Construction.

3. MULTI-YEAR ACCESSIBILITY PLAN

Ellwood Construction maintains a Multi-Year Accessibility Plan in accordance with the AODA.

The Multi-Year Accessibility Plan outlines the Company's strategies and ongoing commitments relating to:

- Information and Communication
- Employment
- Customer Service
- General Requirements
- Design of Public Spaces
- Accessibility Compliance Reporting

The Multi-Year Accessibility Plan is available on the Company's website and in accessible formats upon request. It will be reviewed at least once every five years.

4. ACCESSIBLE CUSTOMER SERVICE

The Company is committed to providing goods, services, and facilities in a manner that respects

the dignity, independence, integration, and equal opportunity of persons with disabilities.

The Company maintains an ***Accessible Customer Service Policy*** that outlines the practices and procedures used to meet the requirements of the AODA and the IASR.

The Accessible Customer Service Policy is available on the Company's website and in accessible formats upon request.

5. TRAINING

The Company will provide accessibility training to employees, volunteers (where applicable), persons who participate in developing Company policies, and others who provide goods, services, or facilities on the Company's behalf, as required by the IASR.

Training will be provided as soon as practicable after hire or assignment of duties and whenever accessibility policies or legislative requirements change.

The Company will maintain records of accessibility training, including the dates training was completed and the individuals who received it.

6. FEEDBACK PROCESS

The Company welcomes feedback on our efforts to ensure accessible customer service to people with disabilities. Those wishing to ask questions or provide feedback to the Company regarding this policy or other AODA initiatives may contact us through the following methods.

Mail
Human Resources Manager
Ellwood Construction
2075 Great Northern Road
Sault Ste. Marie, ON P6B 0C3

Telephone
(705) 688-4436

Email
hr@corpservices.ca

In Person (Corporate Office)
Natalie Parent
Human Resources Manager
2075 Great Northern Road
Sault Ste. Marie, ON P6B 0C3

In situations where you prefer to stay anonymous, feedback can also be sent through our EthicsPoint hotline. The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose.

Online https://secure.ethicspoint.com/domain/media/en/gui/74594/index.html
Telephone: 1-844-994-2318

Accessible formats and communication supports are available upon request and will be provided in a timely manner at no additional cost.

7. DEFINITIONS

Unless otherwise defined in this policy, terms shall have the meanings assigned to them under the *Accessibility for Ontarians with Disabilities Act,* 2005 (AODA), the I*ntegrated Accessibility Standards Regulation* (IASR), and the Ontario Human Rights Code.

For the purposes of this Policy:

Accessible Format: An alternative format that enables a person with a disability to access information. Examples include large print, electronic formats compatible with screen readers, audio formats, Braille, or other formats that meet an individual's accessibility needs.

Assistive Device: Any device, equipment, technology, or other instrument used by a person with a disability to assist with daily living, communication, mobility, personal care, medical needs, or access to goods, services, or facilities. Examples include, but are not limited to, wheelchairs, walkers, hearing aids, communication devices, oxygen tanks, white canes, and other mobility or adaptive equipment.

Barrier: As defined in the *AODA*, anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. Barriers may include physical, architectural, information or communication, attitudinal, technological, policy, or practice barriers.

Communication Support: Supports that assist a person with a disability in accessing or communicating information. Examples include captioning, plain language, sign language interpretation, reading information aloud, or other methods appropriate to the individual's needs.

Disability: As defined in the Ontario Human Rights Code and the AODA, includes the following:

a) Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect, or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
b) A condition of mental impairment or a developmental disability,
c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
d) A mental disorder, or
e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Transitional Modified Work Plan: A documented plan developed collaboratively between the Company and an employee with a disability that outlines workplace accommodations necessary to enable the employee to perform the essential duties of their position and participate fully in the workplace.

Service Animal: An animal accompanying a person with a disability where:

a) it is readily apparent that the animal is used by the person for reasons relating to their disability; or
b) the person provides documentation from a regulated health professional confirming that the animal is required for reasons relating to the disability.

Documentation may be provided by a regulated health professional authorized under Ontario law to provide such documentation.

Support Person: A person who accompanies a person with a disability in order to assist with communication, mobility, personal care, medical needs, or access to goods, services, or facilities.

8. RESPONSIBILITIES

Managers and Supervisors

- Support accessible employment practices.
- Respond to accommodation requests.
- Ensure accessibility requirements are considered in day-to-day operations.
- Escalate unresolved accessibility concerns to Human Resources when appropriate.

Employees

- Treat all persons with dignity and respect.
- Participate in required accessibility training.
- Report accessibility concerns or barriers to their supervisor, Human Resources or anonymously through our Ethics hotline.

9. SUPPORTING DOCUMENTS

- Multi-Year Accessibility Plan
- Accessible Customer Service Policy
- Return to Work and Accommodation Policy

10. REFERENCES

- *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, c. 11.
- *Integrated Accessibility Standards Regulation*, Ontario Regulation 191/11, made under the *Accessibility for Ontarians with Disabilities Act*, 2005.
- Ontario Human Rights Code, R.S.O. 1990, c. H.19.
- Government of Ontario – Accessibility in Ontario: What You Need to Know https://www.ontario.ca/page/accessibility-ontario-what-you-need-to-know

- Government of Ontario – Accessibility Rules for Businesses and Non-Profit Organizations https://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits
- Government of Ontario – Guide to the Integrated Accessibility Standards Regulation (IASR) (where applicable) https://www.ontario.ca/page/accessibility-laws
- Web Content Accessibility Guidelines (WCAG) 2.1 Level AA
- World Wide Web Consortium (W3C) https://www.w3.org/TR/WCAG21/

11. REVISION HISTORY

The Company is committed to developing policies that respect and promote the dignity and independence of people with disabilities. The Company retains the right to amend, modify or repeal this policy at any time; however, any such change will only be made after considering the impact on people with disabilities.

REV NO.	APPROVAL DATE (YYYY-MM-DD)	AUTHOR	APPROVER	COMMENTS
01	2022-11-15	C. Heystee	M. Gran|M. Croskery	Initial document.
02	2023-06-21	N. Parent	M. Gran|M. Croskery	Review & update content and template format.
03	2026-08-27	N. Parent	M. Gran|M. Croskery	Comprehensive review to align with updated Multi-Year Accessibility Plan.

This Accessibility Policy is available in accessible formats upon request.