Multi-Year Accessibility Plan

1. INTRODUCTION

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

Since adopting its first Multi-Year Accessibility Plan, the Company has made accessibility an integral part of its policies, employment practices, customer service, and communications. Accessibility considerations are incorporated into recruitment, accommodation, return-to-work planning, employee training, and the delivery of information and services.

This Multi-Year Accessibility Plan outlines the Company's ongoing commitment to identifying, removing, and preventing barriers for people with disabilities in accordance with the *Accessibility for Ontarians with Disabilities Act*, 2005 (AODA) and the *Integrated Accessibility Standards Regulation* (IASR). The Plan also identifies the actions the Company will take to maintain compliance and continuously improve accessibility over the next five years.

Accessibility Highlights

Since implementing its first Multi-Year Accessibility Plan, Ellwood Construction has:

- developed and implemented Accessibility, Accessible Customer Service, Accommodation, Return-to-Work, and Transitional Modified Work Plan policies;
- integrated accessibility into recruitment, hiring, accommodation, and return-to-work processes;
- established procedures for providing accessible formats and communication supports upon request;
- implemented individualized workplace emergency response procedures where required;
- provided AODA and Human Rights Code training to employees and those responsible for developing Company policies;
- incorporated accessibility considerations into website management and public communications; and
- established processes for receiving and responding to accessibility feedback.

2. PURPOSE

Ellwood Construction's Multi-Year Accessibility Plan ("Accessibility Plan") outlines strategies and actions that will identify, remove, and prevent barriers for people with disabilities and meet Ellwood Construction's obligations under the *Integrated Accessibility Standards Regulation (*"IASR"*)* pursuant to the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

This Multi-Year Accessibility Plan will be posted on Ellwood Construction's website and will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

3. STATEMENT OF COMMITMENT

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. The Company is committed to meeting the needs of people with disabilities in a timely manner by providing a barrier-free environment for all stakeholders, including our clients/customers, employees, job applicants, suppliers, visitors, and any other individual who enters our premises, job sites, or accesses our information. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *AODA* and Ontario's accessibility laws. Where the complete removal of barriers is unattainable, the Company will attempt to accommodate persons with a disability in an appropriate and effective manner.

The Company is committed to meeting its current and ongoing obligations under the *Ontario Human Rights Code* respecting non-discrimination.

The Company understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute for or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

The Company is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

4. SCOPE

This Accessibility Plan applies to all staff, including but not limited to employees, students, contractors and all other third parties involved in the operations of the company.

The Accessibility Plan outlines the Company's strategies to achieve accessibility generally and meet IASR requirements in the following areas:

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

5. INFORMATION AND COMMUNICATION

The Company is committed to making its information and communications accessible to persons with disabilities. The Company is committed to ensuring its information and communications are accessible to persons with disabilities. Information and communication systems will be designed and maintained in accordance with the AODA and the IASR.

a. Accessible Emergency Information

The Company will provide our customers, clients and employees with publicly available emergency information in an accessible way, upon request. The Company will take the following steps to ensure its customers, clients and employees are provided with accessible emergency information as per the AODA requirements:

- Provide publicly available emergency procedures/plans or public safety information in an accessible format
- Provide individualized workplace emergency response information to employees with disabilities when necessary.

b. Websites and Web Content

The Company is committed to ensuring that its Ontario-based websites and web content are accessible and comply with the requirements of the AODA and the IASR.

To support this commitment, the Company will:

- maintain its public website and web content in accordance with the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, or any successor standard adopted under the IASR, except where exemptions apply;
- consider accessibility requirements when developing, procuring, or significantly updating websites and digital content;

- periodically review website accessibility using appropriate accessibility evaluation tools and testing methods;
- work with third-party website developers and service providers to identify and correct accessibility barriers in a timely manner; and
- provide accessible formats and communication supports for web-based information, upon request, in accordance with the IASR.

The Company will notify the public that accessible formats and communication supports are available upon request for information published on its website.

c. Feedback from Customers and Employees

The Company is committed to ensuring that its processes for receiving and responding to feedback are accessible to persons with disabilities.

Feedback regarding accessibility, including customer service, employment practices, facilities, and the Company's website, is welcomed and encouraged. Upon request, the Company will provide or arrange for accessible formats and communication supports to enable individuals to provide feedback and receive responses in a manner that meets their accessibility needs.

When accessible formats or communication supports are requested, the Company will:

- consult with the individual making the request to determine the most appropriate accessible format or communication support;
- provide or arrange for accessible formats and communication supports in a timely manner;
- provide accessible formats and communication supports at no additional cost to the individual; and
- notify the public that accessible formats and communication supports are available upon request.

Feedback may be submitted through any of the following methods:

Mail
Human Resources Manager
Ellwood Construction
2075 Great Northern Road
Sault Ste. Marie, ON P3B 0C3

Telephone
(705) 688-4436

Email
hr@corpservices.ca

In Person
Natalie Parent
Human Resources Manager
2075 Great Northern Road
Sault Ste. Marie, ON P3B 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

Individuals may also provide feedback through designated Company representatives at any provincially regulated Ontario location.

d. Accessible Formats and Communication Supports

The Company will provide accessible formats and communication supports for publicly available information and workplace information, upon request, in accordance with the AODA.

- Post on our website that we can provide information in accessible formats upon request.
- Ensure that the information is provided in a timely manner, at no extra cost, and that the person making the request is consulted in order to determine the appropriate format or support.
- Train all staff in the availability of communications in accessible formats and to whom requests should be forwarded.
- Ensure that specific people (Human Resources, Health & Safety, Marketing) are aware of the importance of responding to information requests.

6. EMPLOYMENT

The Company is committed to fair, equitable, and accessible employment practices throughout the employment lifecycle. The Company will continue to identify, remove, and prevent barriers in recruitment, hiring, accommodation, return to work, career development, and other employment-related processes in accordance with the AODA, the IASR, and the Ontario Human Rights Code.

a. Recruitment and Selection

The Company is committed to providing an accessible recruitment and selection process for applicants with disabilities.

To support this commitment, the Company will:

- notify employees and the public that accommodations are available for applicants with disabilities throughout the recruitment process;

- include accommodation statements in job postings and on the Company's careers website;
- notify applicants selected to participate in interviews, testing, or other assessment processes that accommodations are available upon request;
- consult with applicants requesting accommodation and provide or arrange suitable accommodations that take into account their accessibility needs;
- notify successful candidates of the Company's policies for accommodating employees with disabilities when making offers of employment;
- inform new and existing employees of policies that support employees with disabilities and communicate updates whenever those policies are revised; and
- provide training to hiring managers and others involved in recruitment to ensure accessibility requirements are consistently applied.

b. Workplace Emergency Response Information

Where the Company is aware that an employee has a disability and, due to the nature of that disability, the Company's standard workplace emergency response procedures would not adequately protect the health and safety of the employee, the Company will provide individualized workplace emergency response information as soon as practicable.

Where an employee who receives individualized workplace emergency response information requires assistance during a workplace emergency, the Company will, with the employee's consent, provide the relevant emergency response information to the person designated to assist the employee.

The Company will review the individualized workplace emergency response information:

- whenever the employee moves to a different work location within the organization;
- when the employee's overall accommodation needs or transitional modified work plan are reviewed or updated; and
- whenever the Company reviews or revises its general workplace emergency response procedures.

c. Accommodation Plans and Return to Work

The Company will maintain documented processes for developing transitional modified work plans and facilitating the safe and timely return to work of employees who are absent due to a disability.

These processes include:

- involving employees in the development of their transitional modified work plans;
- considering medical or other expert information where appropriate;
- protecting the confidentiality of personal information;

- providing accommodation plans in accessible formats, upon request;
- reviewing accommodation plans as required to ensure they continue to meet the employee's needs;
- incorporating individualized workplace emergency response information, where applicable; and
- using transitional modified work plans to support the return-to-work process for employees returning from disability-related absences.

The Company's Return-to-Work and Accommodation Policy and Program outline the procedures for developing, implementing, reviewing, and maintaining transitional modified work plans and return-to-work plans.

d. Performance Management, Career Development and Redeployment

The Company will take the accessibility needs of employees with disabilities and any individualized accommodation plans into account when:

- managing employee performance;
- providing career development and advancement opportunities;
- considering promotions or transfers; and
- redeploying employees within the organization.

7. 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 will continue to meet the requirements of the Accessibility Standards for Customer Service under the AODA.

To support this commitment, the Company will continue to:

- provide accessible customer service to all individuals interacting with the Company;
- communicate with persons with disabilities in ways that take their disability into account;
- permit the use of assistive devices, service animals, and support persons, except where otherwise prohibited by law;
- provide notice of temporary disruptions to facilities or services used by persons with disabilities, where applicable;
- provide accessible formats and communication supports upon request and in a timely manner;
- ensure employees and others who interact with the public or participate in the development of Company policies receive accessibility training as required under the AODA; and
- maintain processes for receiving and responding to accessibility-related feedback.

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

8. GENERAL REQUIREMENTS

The Company will continue to meet the general requirements of the AODA and the IASR.

The Company will:

- maintain and review its accessibility policies on a regular basis;
- review and update this Multi-Year Accessibility Plan at least once every five years;
- make the Multi-Year Accessibility Plan available to the public and provide it in an accessible format upon request;
- provide required 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;
- maintain records of accessibility training as required by the IASR; and
- file Accessibility Compliance Reports with the Province of Ontario as required.

9. DESIGN OF PUBLIC SPACE

Where the Company constructs or redevelops public spaces that are subject to the Design of Public Spaces Standard under the IASR, those spaces will be designed and maintained in accordance with the applicable accessibility requirements.

The Company will establish procedures for addressing preventative maintenance and temporary disruptions affecting accessible elements in public spaces, where applicable.

10. ACCESSIBILITY COMPLIANCE REPORTING

The Company will continue to file Accessibility Compliance Reports with the Province of Ontario as required under the AODA and will maintain records demonstrating compliance with applicable accessibility standards.

11. QUESTIONS AND COMMENTS

Questions, feedback, or requests for accessible formats or communication supports relating to this Multi-Year Accessibility Plan or the Company's accessibility initiatives may be submitted using any of the following methods.

The Company will acknowledge and respond to requests in a timely manner and, where practicable, within seven (7) business days.

Mail
Human Resources Manager
Ellwood Construction
2075 Great Northern Road
Sault Ste. Marie, ON P3B 0C3

Telephone
(705) 688-4436

Email
nparent@corpservices.ca

In Person (Corporate Office)
Natalie Parent
Human Resources Manager
2075 Great Northern Road
Sault Ste. Marie, ON P3B 0C3

Accessible formats and communication supports for this document and other publicly available Company information are available upon request and will be provided in a timely manner at no additional cost.

12.SUPPORTING DOCUMENTS

- Accessibility Policy
- Accessible Customer Service Policy
- Return to Work and Accommodation Policy

13.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/

14. REVISION HISTORY

This plan will be reviewed at least once every five years, or sooner if legislative requirements or organizational changes warrant an earlier review.

REV NO.	APPROVAL DATE (YYYY-MM-DD)	AUTHOR	APPROVER	COMMENTS
01	2021-06-01	C. Heystee	M. Gran| M. Croskery	Initial document.
02	2026-08-27	N. Parent	M. Gran| M. Croskery	Comprehensive review and update to reflect current legislative requirements, organizational practices, and ongoing accessibility commitments.

This Multi-Year Accessibility Plan is available in accessible formats upon request.