

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

THE MINTO GROUP INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

| Date of Last Review and Update By Human Resources: July 8, 2024 | | | | | |
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| Related: Ontario Integrated Accessibility Standards Policy and Accessible Client Service Plan – Ontario | | | | | |
| Part I – GENERAL REQUIREMENTS | | | | | |
| Section | Initiative | Description | Action | Status | Compliance Date |
| 3(1) | Establishment of Accessibility Policies | 3(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation. All policies must include a statement of organizational commitment to accessibility. | Minto has an AODA policy which is reviewed regularly. | Completed and Ongoing | December 2017 |
| 4(1)(a) | Accessibility Plans | 4(1) Large organizations shall: a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation. | This multi-year plan has been implemented and will be maintained. | Completed | Formally reissued September 2019 |
| 4(1)(b) | Accessibility Plans | 4(1) Large organizations shall: b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request. | This multi-year plan has been posted on Minto’s website. | Completed | Posted September 2019 |
| 4(1)(c) | Accessibility Plans | 4(1) Large organizations shall: c) review and update the accessibility plan at least once every five years. | The multi-year plan will be reviewed at least once every five years. | Completed and Ongoing | Last review June 2021 |

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| 6(2) | Self-Serve Kiosks | 6(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. | Minto will evaluate accessibility concerns for persons with disabilities when designing, procuring or acquiring self-service kiosks and will consider what accessibility features could be implemented to best meet the needs of customers and clients. | Completed and Ongoing | January 2014 |
| 7(1) | Training | 7(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to: (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization. | Minto utilizes e-learning to provide AODA compliance training to all employees, existing and new hires. | Completed and Ongoing | January 2017 |
| PART II – Information and Communications Standards | | | | | |
| 11(1) | Feedback | 11(1) 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 | Minto will monitor, review and continue to ensure that our processes for receiving and responding to feedback are provided in accessible formats and with communication supports, upon request. | Completed and Ongoing | January 2014 |

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| | | communications supports, upon request. | | | |
| 12(1) | Accessible Formats & Communication Supports | <p>12(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities:</p> <p>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p> | Upon request, Minto will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. | Completed and Ongoing | January 2014 |
| 12(2) | Accessible Formats & Communication Supports | 12(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. | Minto will consult with the person making the request in determining the suitability of an accessible format or communication support. | Completed and Ongoing | January 2014 |
| 12(3) | Accessible Formats & Communication Supports | 12(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Our AODA statement of commitment has been posted on The Minto Group's external websites. | Completed and Ongoing | July 2013 |
| 13(1) | Emergency Procedures, Plans or Public Safety Info | 13(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate | Emergency Procedures are developed and posted at each MCC project and MPI building (crisis response plan developed by MPI compliance). Procedures are not made available to the public but can be shared if required. | Completed and Ongoing | April 2017 |

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| | | communication supports, as soon as practicable, upon request. | | | |
| | Procedures for Preventative + Emergency Maintenance of Accessible Elements in Public Space | Procedures for preventative and emergency maintenance of the accessible elements in public spaces (such as off-street parking, waiting areas and service counters). | Minto has procedures for preventative and emergency maintenance of the accessible elements in public space including emergency procedures for all employees and visitors with disabilities. Proper training exercises are conducted and assigned resources are available to ensure all employees and visitors are accounted for all building evacuations. Monthly workplace inspections are conducted to ensure all accessible elements in public spaces are functioning as per design and any deficiencies are corrected in a timely manner. | Completed and Ongoing | July 2024 |
| 14(2) | Accessible Websites & Web Content | 14(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section. | Our Marketing team and Developer have been making updates to our websites as required to conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA Standards, except where impracticable. Our Marketing Teams will continuously review WCAG guidelines to be informed of updates and will continue to utilize an accessibility monitoring tool(s). | Completed and Ongoing | January 2019 |
| PART III – Employment Standards | | | | | |

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| 22 | Recruitment – General | 22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. | Our commitment to accessibility is included in all aspects of our hiring and selection process. This is posted on our Minto website and on all job postings. | Completed and Ongoing | April 2017 |
| 23(1) and 23(2) | Recruitment, Assessment or Selection Process | <p>23(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>23(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and</p> | Accessibility is reinforced during all contact points with applicants (phone screens and interviews). It is also included in all candidate email communications. | Completed and Ongoing | April 2017 |

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| | | 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. | | | |
| 24 | Notice to Successful Applicants | 24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. | This is included in all offers and offer letters to successful candidates. | Completed and Ongoing | April 2017 |
| 25(1) | Informing Employees of Supports | 25(1) 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. | New hires are provided with information on accessing AODA compliance training as part of their Onboarding. | Completed and Ongoing | April 2017 |
| 25(2) | Informing Employees of Supports | 25(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. | AODA is a mandatory part of a new employee's Onboarding. | Completed and Ongoing | April 2017 |
| 25(3) | Informing Employees of Supports | 25(3) 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 disability. | When policies are updated, the employee intranet is updated and all employees are notified | Completed and on going | April 2017 |
| 26(1) | Accessible Formats & Communication | 26(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall | All employees identified with disabilities who requests support is provided a one-on-one consultation | Completed and on going | April 2017 |

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| | Supports for Employees | 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. | with a HR Resource (i.e. HR, ergonomics, & Health & Safety) | | |
| 26(2) | Accessible Formats & Communication Supports for Employees | 26(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. | All employees identified with disabilities who requests support is provided a one-on-one consultation with a HR Resource (i.e. HR, ergonomics, & Health & Safety) | Completed and on going | April 2017 |
| 27(1) | Workplace Emergency Response Information | 27(1) 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. | If an employee requires assistance, each employee (& caretaker) is provided the emergency response plan information | Completed and on going | April 2017 |
| 27(2) | Workplace Emergency Response Information | 27(2) 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. | If an employee requires assistance, each employee (& caretaker) is provided the emergency response plan information | Completed and on going | April 2017 |

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| 27(3) | Workplace Emergency Response Information | 27(3) 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. | Once an employee has been identified to require disability accommodation, we provide the information immediately | Completed and on going | April 2017 |
| 27(4) | Workplace Emergency Response Information | (4)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. | Every employee that requires an Emergency Response plan receives one and is reviewed regularly | Completed and on going | April 2017 |
| 28(1) | Documented Individual Accommodation Plans | 28(1) 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. | Our current practice is that we develop a plan for all disabled employees. We are currently reviewing our written process | Completed and on going | April 2017 |
| 28(2) | Documented Individual Accommodation Plans | 28 (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. | Our current practice is that we develop a plan for all disabled employees. We are currently reviewing our written process | Completed and on going | April 2017 |

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| | | <ol style="list-style-type: none"> 2. The means by which the employee is assessed on an individual basis. 3. 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. 4. The steps taken to protect the privacy of the employee's personal. 5. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 6. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 7. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. | | | |
| 29(1) | Return to Work Process | 29(1) Every employer, other than an employer that is a small organization: | <u>VOCATIONAL REHABILITATION SERVICES</u> | Completed and on going | Prior to 2012 |

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| | | <p>(a) shall develop and have in place a return 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</p> <p>(b) shall document the process.</p> | <p>Great West life provides the following services for our disability cases:</p> <p>The following services are provided for those cases determined to be entitled to vocational rehabilitation benefits. Services are provided only while the employee is entitled to income benefits under the Plan.</p> <ul style="list-style-type: none"> ☒ Identifying all cases with sufficient anticipated duration of disability to make vocational rehabilitation cost effective and determining the level of activity required to facilitate the earliest possible return to employment. ☒ Recognizing individual needs of employees with disabilities by making a distinction between comprehensive rehabilitation programs and rehabilitation plans. <p>To be classified as a comprehensive rehabilitation program, the goal must be:</p> <ul style="list-style-type: none"> - to return the employee to work in a different job that requires extensive or prolonged training, or | | |
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| | | | <ul style="list-style-type: none"> - to return the employee to work in a self-employed capacity. <p>Training is considered extensive or prolonged if it lasts longer than 12 consecutive months.</p> <p>To be classified as a rehabilitation plan, the goal must be:</p> <ul style="list-style-type: none"> - to return the employee to work in the same job, - to return the employee to work in a modified job with the same employer, or - to return the employee to work in a different job that capitalizes on transferable skills. <p>☐ With the Group Contract holder's authorization, paying for reasonable expenses, other than usual employment expenses, associated with a rehabilitation plan or program, the maximum payment not to exceed 13 times the employee's weekly income benefit under the Plan.</p> | | |
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| | | | <p>☐ Recommending that the Group Contract holder coordinate employment earnings during a rehabilitation period with disability income benefits to encourage a gradual return to work.</p> | | |
| 29(2) | Return to Work Process | <p>29(2) The return to work process shall:</p> <p>(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</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> | <p>Great West life adjudicates our disability management and provides a schedule and RTW work plan that has been approved by GWL and the employee's doctor.</p> <p>This plan is then given to the manger to be followed.</p> | Completed and on going | Prior to 2012 |
| 29 | Return to Work Process | <p>29 (3) 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.</p> | <p>If an employee is managed by GWL or WSIB, we follow their RTW schedule and do not alter from their plans.</p> | Completed and on going | Prior to 2012 |
| 30(1) | Performance Management | <p>30(1) 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 using its performance management process in respect of employees with disabilities.</p> | <p>Minto's Performance Management process takes into consideration and accommodates the accessibility needs of all employees with disabilities</p> | Completed and on going | April 2017 |

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| 31(1) | Career Development & Advancement | 31(1) 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. | All employees who take part in job transfers or promotions are treated the same as we would during the recruitment process – also applies to our internal mobility policy. | Completed and Ongoing | April 2017 |
| 32(1) | Redeployment | 32(1) 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. | Currently, we do not have a redeployment program or policy | | |
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