

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan for NAS employees based in Ontario

Part I – GENERAL REQUIREMENTS

| Section | Initiative | Description | Action | Status | Compliance date/ Review Date |
|---------|---|--|---|--|---|
| 3 | 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. | Develop policy on Integrated Accessibility Standards. | Completed | January 1, 2014 February 2026 |
| 4 | 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; 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. | Created November 28, 2023 Plan is posted on the website under “Important Links- Accessibility”. Plan to be reviewed every 3 to 5 years. | Plan to be regularly updated as progress is made. | January 1, 2014 February 2026 |
| 7 | 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. | Review list of people that will require training by end of 2024. Ensure all new hires are trained. | All employees have been trained. All new employees are being trained in a timely manner. | January 1, 2015 February 2026 |

PART II – Information and Communications Standards

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|---|--|---|--|--|
| 11 | 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 communications supports, upon request. | <p>Review all feedback processes (internal and external) within the company. Ensure there are accessible features available where and when appropriate.</p> <p>Make note that the availability of accessible formats for feedback is available upon request</p> <p>Determine what accessible formats and communication supports we will provide upon request.</p> | <p>Ongoing and to be determined on a case by case basis.</p> <p>Noted in policy in feed back section</p> | <p>January 1, 2015</p> <p>February 2026</p> |
| 12 | Accessible Formats & Communication Supports | 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, 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 charged to other persons. | <p>Determine what alternate formats and communication supports will be made available to people upon request.</p> <p>Ensure they are made available in a timely manner, and at no additional cost to the person (eg. Same day, 24 hours).</p> | Ongoing and to be determined on a case by case basis. | <p>January 1, 2016</p> <p>February 2026</p> |
| 12 | | 12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. | Develop a procedure for handling such requests. | Completed (The Accommodation Process) | <p>January 1, 2016</p> <p>February 2026</p> |
| 12 | | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Policy posted on the website. | Completed | <p>January 1, 2016</p> <p>February 2026</p> |

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|---|--|--|---------|---|
| 13 | 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 communication supports, as soon as practicable, upon request. | Information is not made available to the public | n/a | January 1, 2012 February 2026 |
| 14 | 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. | Have spoken to Marketing about website needing to be accessible. | ongoing | January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. February 2026 Website update expected end of December 2026 |

PART III – Employment Standard

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|--|--|--|--|---|
| 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. | As of January 1, 2023, statement added to job offers, job postings. | Completed | January 1, 2016 February 2026 |
| 23 | Recruitment, Assessment or Selection Process | 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. (2) 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. | When position is advertised, applicants to be informed that accommodations are available. Assessment tools if used will be checked to ensure that alternate formats are available. | Completed Ongoing | January 1, 2016 February 2026 |
| 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. | Appropriate message being put in new hire letters, effective January 1, 2021. | Completed | January 1, 2016 February 2026 |
| 25 | 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. | Customer Service Accessibility policy and Integrated Accessibility Standards policy have been distributed to all employees, are also posted on internal staff portal and company website. Determine the accommodation that is most suitable, upon request. Ensure that training is available in alternative formats, upon request. | Completed Case by case As needed | January 1, 2016 February 2026 |

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|---|--|--|-----------|---|
| 25 | | 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. | Policy is provided to new employees as part of Orientation. Once a new hire requests communication in an alternative format, arrangements will be made for this as soon as possible. | As needed | January 1, 2016 February 2026 |
| 25 | | 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. | If and when relevant policies are revised, they will be re-distributed to all employees. | As occurs | January 1, 2016 February 2026 |
| 26 | Accessible Formats & Communication Supports for Employees | 26.1 In addition to its obligations under section 12, 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. | Once an employee requests accommodation in the context of their work or company information, arrangements will be made for this as soon as possible. | As occurs | January 1, 2016 February 2026 |
| 26 | | 26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. | This will be done when the employee makes the request. | As needed | January 1, 2016 February 2026 |

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|---|---|---|---|---|
| 27 | 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. | Request for disclosure to be sent to employees with individual plan in order to manage emergency situations. Follow-up communications with employees have taken place where appropriate, and individualized emergency plans have been developed. New hires are informed as part of Orientation process. | As needed As needed Ongoing | January 1, 2012 February 2026 |
| 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. | See 27 (1) | | January 1, 2012 February 2026 |
| 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. | See 27 (1) | | January 1, 2012 February 2026 |
| 27 | | (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. | See 27 (1) | | January 1, 2012 February 2026 |

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|---|--|-------------------------------|-----------|---|
| 28 | 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. | See NAS Accommodation Process | Completed | January 1, 2016 February 2026 |
| 28 | | <p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 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 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. 5. The steps taken to protect employee's privacy. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. | See 28 (1) | | January 1, 2016 February 2026 |

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|------------------------|---|---|-----------|----------------------------------|
| 29 | Return to Work Process | <p>29.(1) Every employer, other than an employer that is a small organization,</p> <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> | Refer to NAS Return to Work procedures. | Completed | January 1, 2016 February 2026 |
| 29 | | <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> | See 29 (1) | Completed | January 1, 2016 February 2026 |
| 29 | | 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. | Agreed | No action | January 1, 2016 February 2026 |
| 30 | Performance Management | 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. | Once an employee requests accommodation, arrangements for performance reviews to be done in an alternative manner will be made as soon as possible. | As needed | January 1, 2016 February 2026 |

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|----------------------------------|--|---|-----------|---|
| 31 | 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. | Once an employee requests accommodation, it will be provided as soon as possible when the employee is provided with a development or advancement opportunity. | As needed | January 1, 2016 February 2026 |
| 32 | 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. | Once an employee requests accommodation, it will be provided as soon as possible when the employee is redeployed. | As needed | January 1, 2016 February 2026 |

PART IV – The Built Environment

| Section | Initiative | Description | Action | Status | Compliance Date/ Review Date |
|---------|------------|--|--|--|---|
| 33 | General | 33.(1) An employer will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. These include <ul style="list-style-type: none"> ✓ outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps ✓ Accessible off-street parking | Required changes will be made as modifications are made. | To be done as changes are made to public spaces. | January 1, 2017 February 2026 |