



D.M. Wills Associates - Human Resources Policy

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| Policy Title: | AODA Multi-Year Accessibility Plan | Implementation Date: | January 1, 2024 |
| Prepared By: | Human Resources | Last Reviewed/Revised: | |
| Approved By: | President | Page 1 of 8 | |

Introduction and Statement of Commitment

D.M. Wills Associates Limited (Wills) is committed towards full compliance with current standards of the Integrated Accessibility Standards Regulation (IASR) Policy, Regulation 191/11, under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Wills will develop, maintain and document compliance with this Standard. Wills is committed to excellence in serving all customers, including people with disabilities. This Multi-Year Accessibility Plan is integrated with Wills' Accessible Customer Service Policy to ensure compliance with all of the requirements of Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005. This plan outlines Wills' commitment to accessibility for all and will be updated every five years.

In accordance with the requirements set out in AODA's Integrated Accessibility Standards Regulations (the "IASRs"), Wills will:

1. Establish, review and update this plan in consultation with all applicable legislation
2. Post this plan on the corporate website
3. Provide this plan in an accessible format, upon request
4. Review and update this plan at least once every five (5) years

Actions taken:

- Wills Accessible Customer Service Policy was developed and implemented
- Wills Multi-Year Accessible Plan was developed and implemented



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Planned action:

- Continue to review the accessibility policies and plans annually, with an updated Multi-Year plan established every five (5) years
- The Accessible Customer Service Policy and Multi-Year Accessible Plan will be made available in an accessible format, upon request.
- Post Accessible Customer Service Policy and Multi Year Plan on Wills Website.

Accessible Emergency Information

Wills will ensure that all publicly available safety and emergency information, such as evacuation procedures and floor plans, are provided in an accessible format or with appropriate communication supports upon request.

Where required, Wills will create individual workplace emergency response information for employees with disabilities. This information will account for the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization
- The employee's overall accommodation needs or plans are reviewed
- Wills reviews general emergency response policies.

Planned action:

- An Accessible Format Request Form will be developed and made available for the public for requests for documents in an accessible format. This process will be established by March 2024.



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Accessibility Training

Wills will ensure that training is provided to all employees on the requirements of the accessibility standards referred to in the Regulation and on the Human Rights Code as it pertains to persons with disabilities. Comprehensive training will be provided to all new employees to be completed during the first 30 days of employment. Additionally, Refresher training for AODA and the Human Rights Codes will be provided to all employees annually. Training records will be maintained for all AODA training courses completed, including a record of the dates when training is provided and the employee(s) completing the training.

Actions taken:

- All employees have taken the required **AODA Customer Service Standards** training.
- **AODA Customer Service Standards** training has been made a part of the onboarding/orientation process, to be completed within the first 30 days of employment.
- **AODA Customer Service Standards** refresher training is completed annually for all employees that have not taken the training within 12 months.
- **Understanding Human Rights Training (AODA Edition)** is mandatory for all new hires and a refresher course is completed annually.
- Mandatory training continues to be provided to all new employees

Planned action:

- Accessibility training (AODA) will be provided to all new employees within the first 30 days of employment, and to any individual representing Wills in advance of their position and/or duties commencing.
- Refresher training for AODA will be provided to all staff annually at the beginning of the calendar year. For the duration of this plan, this includes March 2024, March 2025, March 2026, March 2027 and March 2028.



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Information and Communications

Wills is committed to meeting the communication needs of people with disabilities. Wills has and will continue to incorporate new accessibility requirements under the information and communication standards to ensure that its information and communication systems are accessible and are provided in accessible formats that meet the needs of people with disabilities.

There are situations where accessible formats and communication supports may not be provided. These situations include when:

- It is not technically possible to convert a document to an accessible format
- The information comes from another organization
- Wills does not control the information
- The information is found on products or product labels

If it is determined that information or communications are unconvertible, Wills will provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible and a summary of the unconvertible information or communications.

Actions taken:

- Notified the public about the availability of accessible formats and communication supports
- Completed an accessibility review of the Wills website to ensure that it meets the criteria outlined in the AODA legislation



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Planned action:

- A formal plan, including a report form, will be established in March 2024 to create a formal process for addressing feedback
- Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
- Provide or arrange for the provision of such accessible formats and communication supports.
- Consult with the person making the request to determine the suitability of the accessible format or communication support.

Employment

Wills is committed to fair and accessible employment practices across all stages of the employment cycle, in alignment with Employment Standards Act and other applicable legislation. Wills will take the necessary steps to meet the requirements of the IASRs (Integrated Accessibility Standards Regulations) by January 1, 2016 relating to recruitment, individual accommodation plans and return to work process and performance management and career development.

1. Recruitment

Wills is committed to ensure that all recruitment processes are fair and accessible. Actions taken to ensure accessibility include advising all applicants that accommodations are available, upon request.

Actions taken:

- Included in each job posting on the Wills website a statement indicating that accommodations are available, upon request.



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- During the scheduling of interviews and recruitment process, candidates are advised that accommodation is available, if requested.
- Wills has integrated into the standard offer of employment a statement that clearly notifies successful applicants of the policies for accommodating employees with disabilities.
- During onboarding the new employee is again advised that accommodation is available for any training required.

Planned action:

- Provide updated information on accommodations policies to employees when changes occur.
- Consult with the employee to determine suitability of format or support.

2. Individual Accommodation Plans

Wills is committed to producing and providing documented individual accommodation plans, as requested and required.

Actions taken:

- Wills has established a workplace accommodation policy and a safe work program that includes documented processes and information on accommodation for employees with varying abilities.

Planned action:

- Continue to review documented processes and procedures and look for ways to enhance the accommodation program.



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3. Return to Work

Wills has developed and implemented a Return to Work Program for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work.

The Return to Work Program outlines the steps Wills will take to facilitate the employee's return to work and will use documented individual accommodation plans as outlined by the regulation.

Actions taken:

- Wills has established a Return to Work Program for developing individual accommodation plans and return to work policies for employees that have been absent due to a disability.

Planned action:

- Revisit the Wills Return to Work Program annually to make any revisions required to ensure that the Return to Work procedure effectively meets the needs of the organization and Wills employees.

4. Performance Management

Wills will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Individual accommodation plans will be consulted as required.



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Design of Public Spaces

For any future design or modification of current public spaces, Wills will ensure that the requirements of the Accessibility Standards for the Design of Public Spaces are considered and upheld. Such public spaces can include, but are not limited to outdoor eating areas, sidewalks, ramps, parking spaces, lobby and waiting areas, boardrooms, office spaces, and washroom facilities.

Additionally, Wills will take all reasonable measures to prevent service disruptions that may impact the areas of the Wills facilities that are accessible to the public. In the event of a disruption, the public will be notified through signs posted on the door and any other reasonable means. This public notice will include alternative methods of communication and an estimated timeframe of when the disruption will end.

Contact Information

For additional inquiries and/or information regarding Wills' Multi-Year Accessibility Plan, please contact Human Resources.

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