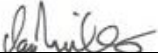
	INTEGRATED ACCESSIBILITY STANDARDS (AODA)	Policy #: HS-1007
	Department: People & Culture	Version #: 1.0
	Approved By: President & CEO	Date Created: May 2/22
	Signature: 	Date Revised:

1. Purpose

Integrated Accessibility Standards include breaking down barriers with regards to accessibility, in the areas of Information and Communication, Employment, Transportation, Design of Public Spaces, and Customer Service. GrandBridge Corporation is governed by this policy in meeting the accessibility needs of persons with disabilities.

GrandBridge Corporation is committed to treating all people in a way that allows them to maintain their dignity and interdependence. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

2. Scope


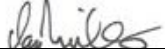
This policy applies to all persons who are employed by and/or volunteer for GrandBridge Corporation and its direct and indirect subsidiaries (collectively referred to as the “Corporation”). This includes employees, contractors, and students.

3. Legislation

Ontario Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the Accessibility for Ontarians with Disabilities Act, 2005.

4. Definitions

- **Alternative Service:** a service generally intended to be temporary that approaches the desired result until such time as the barrier is removed or an equivalent service is put in place
- **Assistive Device:** a technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities.
- **Barrier:** Anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.
- **Contractor:** a company or person with a contract to perform a specific job on behalf of the Corporation.
- **Disability:** is a condition in which:
 - 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 coordination, blindness or visual impediment, deafness, muteness, or physical reliance on a guide dog or other animal
 - b) a condition of mental impairment or 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

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- d) a mental disorder
- e) an injury or disability for which benefits were claimed or received under the insurance plan established
- **Service Animal:** For the purposes of this section, an animal is a service animal for a person with a disability,
 - a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability. O. Reg. 429/07, s. 4 (9).
- **Support Person:** a person who accompanies a person with a disability
- **WCGA:** World Wide Web Consortium Web Content Accessibility Guidelines

5. Method

This policy will be implemented in accordance with the time frames established by the regulation.

Accessibility Plan:

The Corporation will develop, maintain and document a Multi-Year Accessibility Plan (HS-1007 Appendix A) outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated every five years, and will be posted on the company's website. Upon request, the Corporation will provide a copy of the plan in an accessible format.

Self-Serve Kiosks

The Corporation **does not have self-service kiosks available but** will ensure employees consider the needs of people with disabilities **if** designing, procuring or acquiring self-service kiosks.

Training Employees:

The Corporation will ensure training is provided to all employees on the requirements of the accessibility standards referred to in the Regulation and the Human Rights Code as it pertains to persons with disabilities, to:


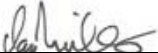
- all its employees
- all persons who participate in developing the Corporation policies; and
- all other persons who provide goods, services, or facilities on behalf of the company.

Training for new employees will be provided as part of the onboarding process and further review of the policy will be conducted with all employees when there are changes. The training will be appropriate to the duties of employees and other persons. The Corporation will keep a record of the training it provides.

5.1 CUSTOMER SERVICE STANDARD

The Provision of Goods and Services to Persons with Disabilities

The Corporation will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal

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opportunity by:

- Ensuring that all customers receive the same value and quality;
- Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities. This includes integrating the provision of goods and services with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person to obtain, use or benefit from the Corporation goods or services;
- Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.
- Communicating in a manner that takes into account the customer's disability.

The Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the Corporation. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Use of Service Animals and Support Persons

A customer with a disability that is accompanied by a guide dog or other service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or other service animals. If a guide dog, service animal or service dog is excluded by law (see applicable laws below) the Corporation will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

The Use of Support Persons

If a customer with a disability is accompanied by a support person, the Corporation will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.


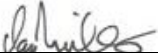
In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Where the Corporation requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, GrandBridge Energy Inc. will not charge the support persons any fees or fares.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Corporation. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the Corporation's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

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In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options:

When disruptions occur the Corporation will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Corporation website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Customer Feedback

The Corporation shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available by (insert ways in which the process will be publicized). Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (handwritten, delivered, website or email), will be available upon request.

Submitting Feedback

Cambridge

Online: [Accessibility Webpage](#)
 Phone: 519-621-3530
 Mail: GrandBridge Energy Inc.
 39 Glebe St. PO BOX 1060
 Cambridge, ON N3T 5N8
 Attention: Customer Care

Brantford:

Online: [Accessibility Webpage](#)
 Phone: 519-751-3522
 Mail: GrandBridge Energy Inc.
 150 Savannah Oaks Dr.
 Brantford, ON N3V 1E8
 Attention: Customer Care

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Training


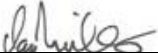
Training will be provided to:

- Every person who is an employee of, or a volunteer with, the provider.
- Every person who participates in developing the provider's policies.
- Every other person who provides goods, services or facilities on behalf of the provider.

Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- How to interact and communicate with people with various types of disabilities. Refer to

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HS-1007 Appendix C Best Practices for Customer Service)

- How to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, or other service animal; or
 - require the use of a support person
- How to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- The Corporation’s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training will be provided to new employees, volunteers, agents and/or contractors during orientation. Revised training will be provided in the event of changes to legislation, procedures, policies, and/or practices.

Format of Documents

The Corporation will provide or arrange for the provision of a document, or the information contained in the document, to the person in an accessible format or with communication support, upon request. The alternate format will be provided in a timely manner that takes into account the persons accessibility needs and will be provided at the same regular cost that would be charged to other persons, where applicable.

5.2 INFORMATION AND COMMUNICATION STANDARDS

Feedback

We allow a variety of opportunities and methods for our customers to provide feedback to the Corporation as outlined in COR-104 Customer Surveys, Feedback, and Suggestions.

The Corporation will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports


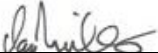
Upon request, the Corporation will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner, and in consultation with the person making the request, in determining the suitability of an accessible format or communication support.

The Corporation will also notify the public about the availability of accessible formats or communication supports.

Accessible Websites and Web Content

All Corporation public facing websites are currently compliant with WCAG 2.0 at level AA as required.

The Corporation will continue to provide ongoing website accessibility training to members of its

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website committee.

5.3 EMPLOYMENT STANDARDS

Recruitment:

The Corporation continues to notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process:

The Corporation will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant submits a request for an accommodation, the Corporation will 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.

Notice to Successful Applicants:

When making offers of employment, the Corporation will notify the successful applicants of its policies for accommodating employees with disabilities.

Informing Employees of Supports:

The Corporation will continue to inform its employees of its policies (and any updates of these policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.


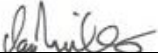
Accessible Formats and Communication Supports for Employees

When requested, the Corporation will consult with an employee to provide or arrange for the provision of accessible formats and communication supports for employees with a disability for information that is needed in order to perform the employee’s job, and information that is generally available to all employees in the workplace.

Workplace Emergency Response Information

The Corporation will provide individualized workplace emergency response information to employees who have a disability in a timely manner, **when the need for individualized accommodation is necessary**, and the employer is made aware of the disability. If the employee with a disability requires the assistance of another employee within their emergency response information, the Corporation will provide the information to that employee, upon consent from the individual with a disability.

The Corporation will ensure to review the Individualized Workplace Emergency Response Information when the employee moves to a different location; when the employee’s overall accommodations needs, or plans are reviewed; and when the Corporation reviews its general emergency response policies. Documented plans will be completed using HS-1007B Individualized Emergency Response Info.

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Documented Individual Accommodation Plans

An employee with a disability can request an Individual Accommodation Plan through Human Resources. The accommodation plan will be developed in conjunction with the employee and Human Resources, along with an expert evaluation. The Corporation reserves the right for evaluation by an outside medical expert for the purposes of completing the accommodation plan. Union employees can also request that a representative of the bargaining unit be included in the development of their Individual Accommodation Plan. All information collected, and the accommodation plan itself, will remain confidential and stored securely. Human resources, the employee, and the employee’s direct Management/Leadership Team member(s) are the only employees who will be privy to the information included in the Individual Accommodation Plan, as required for performance management. HS-1003A Return to Work Report will be used to document the individual’s accommodation plan.

If required, the accommodation plan will be provided in an alternate format that takes into account, the employees accessibility needs due to the disability. In the event that an Individual Accommodation Plan cannot be addressed due to lack of medical information or bona fide job requirements that cannot be accommodated the individual will be advised accordingly.

Return to Work Process

The Corporation maintains a documented return to work process for its employees who have been absent from work due to disability and who require disability-related accommodations in order to return to work. The return to work process (HS-1003) outlines the steps the Corporation will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

The return to work process will not replace or override any other return to work process created by or under any other Statute (i.e. the Workplace Safety Insurance Act, 2007).

Performance Management, Career Development and Advancement & Redeployment

The Corporation will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

5.4 TRANSPORTATION STANDARDS


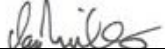
The responsibilities under the transportation standards do not apply to the Corporation.

5.5 DESIGN OF PUBLIC SPACES STANDARDS

In the event the Corporation is responsible for any newly constructed public spaces including but not limited to waiting rooms, service counters, exterior paths of travel, parking lots for public use, the Company will ensure it follows the guidelines set out in part IV.1 of the regulation.

6. Document Review

This policy will be reviewed at a minimum of every five years based on compliance requirements, or

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as required based on legislated changes.

7. Related Documents or Forms

- HS-1007 Appendix A - IAS Multi-Year Plan
- HS-1007 Appendix B Individualized Emergency Response Information
- HS-1007 Appendix C Best Practices for Customer Service
- HS-1003A - Return to Work Report

8. Revision History

Version	Date	Description	Author
1.0	May 2, 2022	Initial Policy for GrandBridge Corporation	M. Almeida-Hann