	INTEGRATED ACCESSIBILITY STANDARDS (AODA)	Policy #: HS-1007
	Department: People & Talent Management	Version #: 2.0
	Approved By: VP, People & Talent Management	Date Created: May 2, 2022
	Signature: <i>Adrian Lamm</i>	Date Revised: June 1, 2026

1. Purpose

Integrated Accessibility Standards address the identification, prevention and removal of barriers 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 manner that allows them to maintain their dignity and independence. We are committed to meeting the needs of persons with disabilities in a timely manner by preventing and removing barriers to accessibility and meeting applicable requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (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, volunteers and students.

3. Legislation

Ontario Regulation 191/11, Integrated Accessibility Standards, 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 the barrier is removed, or an equivalent service is put in place
- **Assistive Device:** a technical aid, communication device, or medical aid that is modified or customized and 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 their disability, including a physical, architectural, information or communications, attitudinal, technological, policy or a practice barrier.
- **Contractor:** a company or person with a contract to perform a specific job on behalf of the Corporation.
- **Disability:** as defined under the AODA and Ontario Human Rights Code, disability includes:
 - a) any degree of physical disability, infirmity, malformation or disfigurement caused by bodily injury, birth defect or illness including but not limited to, diabetes mellitus, epilepsy, brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, deafness, muteness, or physical reliance on a guide dog or other service animal, wheelchair, or other remedial appliance or device;
 - 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; or
- e) an injury or disability for which benefits were claimed or received under the Workplace Safety and Insurance Act, 1997.
- **Service Animal:** 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 their disability; or
 - b) the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to their disability.
- **Support Person:** a person who accompanies a person with a disability to assist with communication, mobility, personal care, medical needs, or access to goods, services, or facilities.
- **WCGA:** World Wide Web Consortium Web Content Accessibility Guidelines.

5. Method

This policy will be implemented in accordance with the timeframes established by the Regulation.

Procurement

The Corporation will incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so. If it is not practicable to incorporate accessibility criteria and features, the Corporation will provide an explanation upon request.

This policy will be implemented in accordance with the timeframes established by the Regulation.

Accessibility Plan:

The Corporation will develop, maintain and document a Multi-Year Accessibility Plan (HS-1007 Appendix A) outlining the Corporation'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 at least every five years and will be posted on the Corporation's website. Upon request, the Corporation will provide a copy of the plan in an accessible format.


The Corporation will prepare and make available an annual status update on the progress of measures taken to implement the Multi-Year Accessibility Plan.

Self-Serve Kiosks

The Corporation **does not have self-service kiosks available**. If the Corporation designs, procures or acquire self-service kiosks in the future, it will ensure that employees consider the needs of persons with disabilities.

Training Employees:

The Corporation will ensure training is provided 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. Training will be provided to:

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- all 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. Further review of the policy will be conducted with employees when changes are made. 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 its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Providing goods, services and facilities in a manner that respects the dignity and independence of persons with disabilities;
- Integrating the provision of goods, services and facilities to persons with disabilities with those provided to persons without disabilities, unless an alternative measure is necessary to enable a person to obtain, use or benefit from the Corporation's goods, services or facilities;
- Giving persons with disabilities an opportunity equal to that given to others to obtain, use and benefit from the Corporation's goods, services or facilities; and
- 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, services or facilities provided by the Corporation. In cases where the assistive device presents a safety concern or where accessibility may be an issue, other reasonable measures will be used to ensure access to goods, services or facilities. For example, where elevators are not present and where an individual requires an assistive device for mobility, service will be provided in a location that meets the needs of the customer's needs.


Use of Service Animals

A customer with a disability who is accompanied by a guide dog or other service animal will be permitted access to premises that are open to the public unless the animal is 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 the Corporation will offer alternative methods, where possible to enable the person with a disability to access goods, services, or facilities. This may include securing the animal in a safe location and offering the assistance 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 accessing the support person.

In situations where confidential information may be discussed, consent will be obtained from the

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customer before the conversation takes place.

Where the Corporation requires a support person to accompany a person with a disability, and the person with a disability agrees to the accompaniment, the Corporation will not charge the support person any fees or fares.

Notice of Disruptions in Service

Service disruptions may occur for 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, services or facilities, reasonable efforts will be made to provide advance notice. In some circumstances such as unplanned temporary disruptions, advance notice may not be possible.

Where notice is required, the following information will be included unless it is not readily available or known:

- The goods, services or facilities that are disrupted or unavailable;
- The reason for the disruption;
- The anticipated duration; and
- A description of alternative services or options, where available.

When disruptions occur, the Corporation will provide notice by:

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


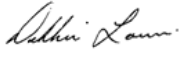
Customer Feedback

The Corporation will 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 on the Corporation's websites. Feedback forms along with alternative methods of providing feedback such as verbally, in person or by telephone, will be available upon request.

Feedback may be submitted through the following methods:

Email: accessibility@grandbridgecorporation.com
 Phone: 519-621-3530 x2441
 Mail: GrandBridge Corporation
 39 Glebe St. PO BOX 1060
 Cambridge, ON N1R 5X6
 Attention: People & Talent Management

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

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Corporation will respond to feedback within a reasonable timeframe.

Training

Training will be provided to:

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

Regardless of 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 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 on the Corporation’s premises or otherwise provided by the Corporation that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing the Corporation’s services; and
- The Corporation’s policies, procedures and practices pertaining to accessible customer service.

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.

Public Emergency Information

Where the Corporation makes emergency procedures, plans, or public safety information available to the public, it will provide such information in an accessible format or with appropriate communication support, upon request.

Format of Documents


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

5.2 INFORMATION AND COMMUNICATION STANDARDS

Feedback

The Corporation allows a variety of opportunities and methods for customers to provide feedback as outlined in section 5.0 Customer Feedback above.

The Corporation will continue to ensure that its process for receiving and responding to feedback

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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 arrange for the provision of accessible formats and communication support for persons with disabilities in a timely manner. The Corporation will consult with the person making the request to determine 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 2.2 at level AA, except where exempt under the Accessibility for Ontarians with Disabilities Act, 2005 and its regulations.

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

5.3 EMPLOYMENT STANDARDS

Recruitment:

The Corporation will continue to notify 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, who 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 requests 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 those policies used to support employees with disabilities, including policies on the provision of job accommodation 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 they commence employment.

Accessible Formats and Communication Supports for Employees

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When requested, the Corporation will consult with an employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform the employee’s job and information that is generally available to 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 individualized accommodation is necessary and the Corporation is aware of the need for accommodation. If an employee with a disability requires the assistance of another employee as part of their workplace emergency response information, the Corporation will provide the relevant information to that employee, with the consent of the employee with a disability.

The Corporation will review individualized workplace emergency response Information when the employee moves to a different location; when the employee’s overall accommodations need 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.

Documented Individual Accommodation Plans


An employee with a disability may request an Individual Accommodation Plan through People & Talent Management. The accommodation plan will be developed in conjunction with the employee and People & Talent Management, along with any required expert evaluation. The Corporation reserves the right to request an evaluation by an outside medical expert for the purposes of completing the accommodation plan. Unionized employees may request that a representative of the bargaining unit be included in the development of their Individual Accommodation Plan. All information collected, including the accommodation plan itself, will remain confidential and will be stored securely. People & Talent Management, the employee, and the employee’s direct Management or Leadership Team member(s) will have access to the information included in the Individual Accommodation Plan, as required for accommodation, return to work or performance management purposes. 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 accessible format that takes into account, the employees’ accessibility needs due to the disability. If an Individual Accommodation Plan cannot be completed 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 employees who have been absent from work due to disability and who require disability-related accommodations to return to work. The return-to-work process, HS-1003 outlines the steps the Corporation will take to facilitate the employees 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, including the Workplace Safety Insurance Act, 2007.

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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 or 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

If 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 Corporation will ensure that it follows the requirements set out in part IV.1 of the Regulation.

6. Document Review

This policy will be reviewed at a least every five years based on compliance requirements, or earlier if required due to legislative changes or operational needs.

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
2.0	June 1, 2026	Revisions based on updated Customer Contact Information; alignment to current AODA requirements; web accessibility standards; added Procurement and Public Emergency Information sections.	M. Almeida-Hann