

 <p>Britespan BUILDING SYSTEMS INC And all associated companies</p>	Accessibility Policy (AODA)	
	Revision Level: Initial Release	Revision Date: August 2023

Purpose

The purpose of this policy is to provide a framework within which accessibility needs are identified and plans and initiatives are created to move the organization toward the goal of improved accessibility for people with disabilities.

Britespan is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario’s accessibility laws.

In addition, Britespan is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. Britespan understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Scope

This Policy applies to all employees acting on behalf of Britespan Building Systems Inc and all associated companies in Ontario. It may be revised as other standards are introduced under the AODA.

Definitions and Acronyms

AODA – Means the Accessibility for Ontarians with Disabilities Act, 2005 and its Regulations.

Accommodation - means giving opportunities to people of all abilities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, program, product, or environment.

Accessibility - means giving opportunities to people of all abilities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, program, product, or environment.

Accessible design refers to products, devices, information, services, facilities, or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both “direct access” (i.e., unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.

Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Accommodation refers to the obligation to eliminate the disadvantage, to the point of undue hardship, caused by barriers that exclude individuals or groups protected under the Ontario Human Rights Code from participating in all aspects of their employment and/or their receipt of services based on disability.

Assistive devices are any technical aids, communication devices or medical aids that are used to increase, maintain, or improve the experience of individuals with disabilities. Assistive devices include, but are not limited to, wheelchairs, walkers, white canes, prosthetic limbs, note taking devices, portable magnifiers, recording machines and electronic communication devices.

Barriers means anything that keeps a person with a disability from participating in all aspects of society. Examples of barriers include:

- Physical and architectural barriers: occur in the environment and prevent access for people with disabilities. Examples include narrow doorways, stairs, dim lighting, or high glare surfaces.
- Information or communications barriers: arise when a person with a disability cannot easily receive and/or understand information that is available to others (e.g., publications that are not available in large print, digitally, Braille or other accessible formats).
- Technological barriers: occur when technology or the way it is used does not meet the needs of people with disabilities (e.g., a website that does not support screen reading software).
- Attitudinal barriers: may result in people with disabilities being treated differently than people without disabilities (e.g., a receptionist who talks to an individual's support person rather than the individual with a disability); or
- Systemic barriers in policies, practices and procedures result in people with disabilities being treated differently than others or sometimes excluded altogether.

Communication support may be used to access information or increase communication effectiveness. These supports include, but are not limited to, captioning, alternative and augmentative communication supports (i.e., methods used to supplement or replace speech or writing for those with impairments in the production or comprehension of spoken or written language), plain language, sign language, and other supports that facilitate effective communication.

This definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

Disability

- 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 co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a support person or guide dog or other animal or on a wheelchair or other remedial device,
- A condition of mental impairment or a developmental disability,
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

Assistive device – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that people bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Service Animal – an animal is a service animal for a person with a disability if:

- The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, because of visual indicators such as the vest or harness worn by the animal; or
- The person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - A member of the College of Chiropractors of Ontario.
 - A member of the College of Nurses of Ontario.
 - A member of the College of Occupational Therapists of Ontario.
 - A member of the College of Optometrists of Ontario.
 - A member of the College of Physicians and Surgeons of Ontario.
 - A member of the College of Physiotherapists of Ontario.
 - A member of the College of Psychologists of Ontario; or
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Service Dog - As reflected in Health Protection and Promotion Act, Ontario Regulation 562, a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Guide Dog – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety and increased independence for people who are blind.

Support Person – a support person means, in relation to a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care, medical needs or access to goods and services.

Information means data, facts, and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Person Requiring Assistance (PRA) means a person identified as requiring assistance at the time of an evacuation. This can be due to a medical condition or some other reason.

Person with Disabilities means an individual who has a disability.

Public spaces refer to an area or place, such as a parking lot or a service counter, which must be open and accessible to all people.

Support Persons means any person whether a paid professional, volunteer, family member, or friend who accompanies a person with a disability to provide assistance.

Temporary Disruption means a short term planned or unplanned disruption to Britespan's premises or services that persons with disabilities usually use to obtain Britespan's goods and/or services.

Web Content Accessibility Guidelines means the World Wide Web Consortium Recommendation entitled Web Content Accessibility Guidelines (WCAG).

Standards / Procedures

Britespan shall make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all employees and customers receive the same value and quality.
- Allowing all employees and customers with disabilities to do things in their own way and at their own pace when accessing services if this does not pose a safety risk.
- Using alternative methods, when possible, to ensure that all employees and customers with disabilities have access to the same services, in the same place and in a similar manner.
- Considering individual needs when providing services; and
- Communicating in a manner that considers the employees or customers disability.

It is recommended that Britespan Employees use the term “persons with disabilities” or “people with disabilities” and if a specific condition must be referenced, the condition be referenced last (e.g., person with low vision). To guide communication and interaction with or about people with all types of disabilities:

- It is important to put people first. It is more appropriate to say, “person with a disability”, rather than “disabled person” or “the disabled”.
- It is best not to make assumptions. Wait until an individual describes their disability to you. Disabilities can be complex, and our assumptions may be inaccurate.

Accessibility Standard for Employment

- Employees of Britespan will be made aware that the company provides accommodation for applicants with disabilities in its recruitment, assessment, and selection processes.
- Where an employee with a disability so requests, Britespan will consult with management and employees to provide workplace accommodation to enable the employee to perform their job.
- Other arrangements will be made for:
 - Workplace emergency response information
 - Return-to-work process
 - Performance management processes
 - Career development and advancement processes
 - Redeployment
 - Training for staff

Recruitment and Selection

- All recruitment policies, procedures and practices must comply with the Ontario Human Rights Code. All internal and external candidates shall receive equal treatment with respect to employment without discrimination because of disability.
- Britespan will seek to recruit employees based on their ability and the requirements of the job posting. No applicant will receive less favourable treatment than another on the grounds of disability.

Use of Assistive Devices

- The company welcomes the use of assistive devices and encourages people with disabilities to seek support from staff and Managers as they require it.
- Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Britespan.
- In cases where the assistive device presents a safety or hygiene concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a person with an oxygen tank may involve ensuring the person is in a location that would be considered safe for both the person and business. Or, 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 person with a disability.

Use of Service Animals

- If a person with a disability is accompanied by a guide dog, a service dog, or another service animal, the person may enter any Britespan facility with the animal and keep the animal with them.
- If a law or valid workplace requirement (including employee safety) excludes a service animal, the reason why the animal is excluded will be explained to the individual and reasonable arrangements will be explored.

Exclusion Guidelines

If a guide dog, service animal or service dog is excluded by law, Britespan will offer alternative methods to enable the person with a disability to access our facilities when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the person for reasons relating to his or her disability, Britespan may request verification from the person.

Care and Control of the Animal:

The person who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, Britespan will make all reasonable efforts to meet the needs of all individuals.

Use of Support Persons

- A person with a disability who is accompanied by a support person will be welcomed at Britespan's premises with their support person.
- If a person with a disability is accompanied by a support person, Britespan will ensure that both persons are allowed to enter the premises together and that the person with a disability is not prevented from having access to the support person.
- There may be times where seating and availability prevent the person with the disability and support person from sitting beside each other. In these situations, Britespan will make every reasonable attempt to resolve the issue.
- In situations where confidential information might be discussed, consent will be obtained from the person with the disability, prior to any conversation where confidential information might be discussed.

Training

Training will be provided to:

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

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*.
- A review of the requirements of the Standards contained within the Act.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices.
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).

- Instructions on 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 our services.
- Britespan 's policies, procedures and practices pertaining to providing accessibility for persons with disabilities.

Training Schedule

Britespan will provide training as soon as practicable. Training will be provided to all existing employees, new employees, volunteers, agents and/or contractors. Revised training will be provided in the event of changes to legislation, procedures, policies, and/or practices.

Record of Training

Britespan will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Disruption of Services

If a disruption of service is planned or expected, Britespan will provide notice as far in advance as is possible as individuals may require considerable time to make alternate arrangements. Examples of disruption of service would be electrical power interruptions, winter storms, plumbing repairs.

If a disruption of service is unexpected, Britespan will provide notice as soon as possible after the disruption has been identified. When temporary disruptions occur to the Britespan's services or facilities, the company will provide notice in the most effective way possible which may include:

- Posting a notice in visible places
- Britespan website
- Any other method that may be reasonable under the circumstances (i.e.: e-mail) as soon as reasonably possible

Accessible Website and Web Content

The Marketing Department will assess our website and web content to identify, remove and prevent barriers and ensure online information and communications are accessible for all individuals accessing our website.

Feedback Process

- Employees with disabilities with specific questions or concerns should initiate contact with their Manager and Human Resources.
- People with disabilities, other than employees, who require general feedback concerning Britespan policies and procedures relating to people with disabilities should contact Human Resources.
- Britespan will notify customers that the documents related to all applicable Standards with respect to the *Accessibility for Ontarians with Disabilities Act, 2005*, are available upon request and in a format that considers the person's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Britespan, the Britespan 's website and/or any other reasonable method.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Courtney Poulin
 Director of Human Resources, Britespan Buildings Inc.
 Email: HR@britespanbuildings.com
 Telephone: 519-531-0895
 Address: 688 Josephine St. RR#1 Wingham, ON, N0G 2W0

Feedback Process: If a complaint is received Britespan will confirm receipt within 24 business hours and work closely with the complainant to come to a resolution within a reasonable timeframe.

Britespan will provide documents related to this policy in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner.

Roles and Responsibilities

Management

- Model behaviour through decisions, actions and interactions that are consistent with the provisions of this Policy and Procedure.
- Respond to and provide input into Policy and Procedure changes.
- Ensure individuals maintain compliance with this Policy and Procedure.
- Act on non-compliance issues within their areas of responsibility.
- Consider all points of contact where an employee with a disability may interact with our workplace. What barriers might an individual with a disability encounter? What changes would improve accessibility?
- Ensure the confidentiality of the individual in all cases.
- Allow individuals with disabilities to use their assistive devices, support persons and service animals.
- Record all adaptations for people with disabilities.
- Ensure continuous improvement suggestions and ideas for future situations involving accommodation of people with disabilities are properly integrated into all operations policies and procedures and communicated to other Directors and Managers.

Employees

- To adhere to this policy and procedure.
- Individuals and departments are encouraged to receive and act on direct comments or feedback about the accessibility of our services.

Human Resources

- Review this Policy and Procedure on a regular basis.
- Direct changes to this Policy and Procedure as required.
- Ensure the Policy and Procedure are communicated to all employees and contractors.
- Establish and deliver a training program for all employees on accessibility standards.
- Act on non-compliance issues and ensure continuous improvement processes are initiated.

Marketing/ Technology Department

- Britespan will actively assess its website and web content to identify, remove and prevent barriers to ensure online information and communications are accessible for all employees.

Revision Log

Rev. Level	Date	Sections Affected	Description of Change
1	08/03/2023	All	Initial Release