



POLICY		Integrated Accessibility Standards (IASR)	
DOC #	POL_People & Culture	REVISION DATE	2023-12-11
APPROVED BY:	TROY HARE, CEO & PRESIDENT		

PURPOSE AND SCOPE

The following policy has been established and updated by Milton Hydro to govern the provision of services in accordance with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy and plan has mandatory application to all employees, staff, and volunteers, who interact with members of the public on behalf of Milton Hydro, and who are involved in the development of company policies, practices, procedures and physical spaces.

Milton Hydro and all subsidiary companies (hereafter referred to as Milton Hydro) is governed by this policy as well as the *Accessible Customer Service Standard Policy*, and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

1.0 COMMITMENT

Milton Hydro is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. 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*.

2.0 MULTI YEAR ACCESSIBILITY PLAN (APPENDIX 1)

Milton Hydro will develop, maintain, and document an Accessibility Plan outlining Milton Hydro 's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan and this Policy will be reviewed and updated at least once every five years and will be posted on Milton Hydro 's website and in our facilities. Upon request, Milton Hydro will provide a copy of the Accessibility Plan in an accessible format or with communication supports that meet the needs of the individual.

3.0 DESIGN OF PUBLIC SPACES AND SELF-SERVE KIOSKS

If Milton Hydro is building or making any major modifications to a public space it will comply with all legislative requirements, including those mandated by the *AODA*.



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Milton Hydro will ensure that any outdoor paths of travel, like sidewalks, outdoor walkways, ramps, stairs, curb ramps, rest areas, access points to the building, off-street parking, and accessible pedestrian signals, which are under its control, are accessible to individuals with disabilities. This includes but is not limited to: ensuring that appropriate slope angles for ramps, curb ramps, and depressed curbs are implemented; stairs and ramps have appropriate handrails, rise dimensions, anti slip features, and tactile and/or tonal indicators; off street parking is accessible and meets prescribed standards; and any other requirements prescribed by law are met.

Milton Hydro will have regard to the accessibility for persons with disabilities in the event that it designs or acquires service counters or self-service kiosks, including any interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access products or services. Milton Hydro will further ensure that if building service counters, at least one counter could reasonably accommodate a mobility aid including having sufficient height, knee clearance, and floor space to accommodate a mobility aid, and that appropriate signage is included. Any fixed queuing guides will be of sufficient width and floor area to allow for the passage of mobility assistive devices and will be cane detectable. Waiting areas will include accessible seating.

Milton Hydro will have procedures for preventative and emergency maintenance of accessible elements and for dealing with temporary disruptions when accessible elements are not in working order.

4.0 TRAINING EMPLOYEES AND VOLUNTEERS

In addition to training under Milton Hydro’s Accessible Customer Service Standard Policy, Milton Hydro will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- 1.0 all its employees and volunteers;
- 2.0 all persons who participate in developing Milton Hydro’s policies; and,
- 3.0 all other persons who provide goods, services or facilities on behalf of Milton Hydro.

The training will be appropriate to the duties of the employees, volunteers, and other persons.



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Employees will be trained when changes are made to the accessibility policy. New employees will be trained as soon as practicable, and normally within their probationary period. Employees will be retrained as required when policies and plans are amended.

Milton Hydro will keep a record of the training it provides.

5.0 INFORMATION AND COMMUNICATIONS STANDARDS

5.1 Feedback

Milton Hydro welcomes and appreciates all forms of feedback. We are also committed to establishing and maintaining a process for receiving and responding to feedback about how our services are provided to people with disabilities.

Milton Hydro will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request:

- Milton Hydro will review its existing processes for receiving feedback, to ensure that disabled individuals can provide feedback in a manner that meets their particular needs.
- Upon request and in a timely manner, Milton Hydro will provide an accessible format and/or communication support to enable an individual with a disability to provide feedback, including feedback about the feedback process itself. Feedback can be delivered verbally (in person or by telephone) or in writing (and delivered in person or via regular mail, fax or email). If a method of providing feedback is not suitable, Milton Hydro will provide additional alternate methods upon request and will ensure that the feedback process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.
- Feedback received by Milton Hydro will be redirected to a designated contact person within Milton Hydro's office. Along with providing acknowledgement of such feedback, Milton Hydro will communicate any resulting actions based on concerns or complaints that were submitted.



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- Upon request and in a timely manner, Milton Hydro will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication supports. Accessible Formats and Communication Supports

Upon request, Milton Hydro will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person’s accessibility needs due to disability.

Milton Hydro will consult with the person making the request in determining the suitability of an accessible format or communication support.

Milton Hydro will also notify the public about the availability of accessible formats and communication supports. Milton Hydro will review from time to time its existing processes for providing the public with information, to ensure that disabled individuals can also receive such information in a manner that meets their particular needs to make sure all publicly available information is made accessible to persons with disabilities upon request.

5.2 Accessible Websites and Web Content

Milton Hydro is committed to meeting the communication needs of people with disabilities. Upon request, Milton Hydro will consult with people with disabilities to determine their information and communication needs.

Milton Hydro will also ensure that all internet websites and web content conform with WCAG 2.0 Level AA, other than, success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded). Except where meeting the requirement is not practicable within the meaning of the AODA and its Regulations, this commitment applies to all web content published on a website after January 2012, and all websites and web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modification of the product.

6.0 EMPLOYMENT STANDARDS

The Company is committed to fair and accessible employment practices. This commitment applies at all stages of the employment relationship.



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6.1 Recruitment

Milton Hydro will notify its employees and the public about the availability of accommodation for applicants with disabilities to support their participation in its recruitment process. If an applicant requests accommodation, Milton Hydro will consult with the applicant to determine the appropriate means of accommodation.

6.2 Recruitment, Assessment or Selection Process

Milton Hydro 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 in the recruitment, assessment, and selection process.

If a selected applicant requests an accommodation in the process, Milton Hydro 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.

6.3 Notice to Successful Applicants

When making offers of employment, Milton Hydro will notify the successful applicant of its policies for accommodating employees with disabilities.

6.4 Informing Employees of Supports

Milton Hydro will continue to inform its employees of its policies (and any updates to those 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 and in the event of a change in the Company’s accommodation policies and/or procedures, if required.

6.5 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Milton Hydro will consult with the employee to provide, or arrange for the provision of, accessible formats and



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communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Milton Hydro will consult with the employee making the request.

6.6 Workplace Emergency Response Information

Milton Hydro will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Milton Hydro is aware of the need for accommodation due to the employee’s disability. Milton Hydro will provide this information as soon as practicable after becoming aware of the need for accommodation.

An employee who requires individualized workplace emergency response assistance due to a disability will inform his or her Supervisor and the Manager of Loss Prevention and Environmental Compliance, and together they will document the individualized workplace emergency assistance required on Milton Hydro’s “Individual Employee Emergency Assistance Information” form (Appendix 2) and “Identification of Potential Barriers during an Emergency Response” form (Appendix 3). Such forms will be revised as required to accommodate individual needs. With the employee’s consent, Milton Hydro will provide a copy of the completed form to the person(s) designated by Milton Hydro to provide assistance to the employee during an emergency. The completed form will be kept in the employee’s Human Resources file.

The employee is responsible for initiating any updates to the document that may be required due to changes in 1) accommodation needs or plans, 2) work location, 3) any other changes which would impact the employee’s emergency assistance plan.

6.7 Documented Individual Accommodation Plans

Milton Hydro will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.



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Specifically,

- The Company will ensure that an employee requesting accommodation can participate in the development of the individualized accommodation plan. Employees will be able to participate in the development of the individualized accommodation plan by (a) advising the Company of the limitations brought about by the nature of their disability; (b) suggesting methods of accommodating those limitations; and (c) providing medical support for any accommodations requested.
- Employees will be able to participate in the development of the individual accommodation plan by meeting with the Company's management/human resources in person at a mutually convenient time or by providing his or her written comments to a Company supervisor. Please note that the Company may require an employee to provide medical support for accommodations requested and/or a meeting in person in order to canvass possible options for accommodation.
- The Company will support the ongoing assessment of employees for the purpose of individualized accommodations with reference to any medical information provided by the employee and any medical information requested based upon objective observations and criteria that may necessitate an initial or ongoing physical or mental assessment.
- The Company may request an independent medical examination to assist in the accommodation process. Any request for an independent medical examination will be made in writing and the cost of the examination will be borne by the Company or its insurer, as the case may be.
- An employee's or candidate's privacy, as it relates to any personal information disclosed as a result of the need for an individualized accommodation plan, will be safeguarded to the extent possible. The Company will ensure that only information that is reasonably necessary for the accommodation inquiry will be sought from the employee or job applicant. The Company will keep any information disclosed in management offices, with appropriate safeguards, and will not share that information (except as required to implement the individual accommodation plan, including with medical consultants retained by the Company) with any third party



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without the consent of the employee. Accommodation information that is no longer necessary will be securely destroyed.

- Individualized accommodation plans will be reviewed every two years or upon the provision of new, objective medical information or a change in circumstances that necessitates an earlier review. The Company will undertake the review and will consult with the employee if it is determined that amendments to the plan are required. An employee can request a review of the individualized accommodation plan at any time, understanding that such requests must be objectively necessary and based upon a change in the employee’s accommodation needs, the workplace duties being assigned and/or the physical layout of the workplace.
- In the event that a request for individualized accommodation plan is denied (in whole or in part, including requests to amend the plan), the Company will notify the employee of the reasons for the denial in writing and, with reference to the employee’s disability, in an alternate format that takes into account the employee’s disability.
- Individualized accommodation plans will be provided to an employee in writing and, with reference to the employee’s disability, in an alternate format that takes into account the employee’s disability.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.



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6.8 Return to Work Process

Milton Hydro maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return-to-work process outlines the steps Milton Hydro will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This 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, 1997*) or that is required by the terms of the employee’s contract, such as pursuant to a benefit plan.

6.9 Performance Management, Career Development and Advancement & Redeployment

Milton Hydro 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.

7.0 QUESTIONS ABOUT THIS POLICY

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, please contact us.

7.1 All External Inquiries:

Customer related inquiries or any other non-employment related external inquiry may be made by:

- calling (905) 876-4611;
- faxing at (905) 876-2044; – Attention: Customer Service – AODA ;
- emailing the inquiry to customerservice@miltonhydro.com Attention: Customer Service - AODA;



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- mailing the inquiry to Milton Hydro, 200 Chisholm Dr, Milton, ON L9T 3G9 – Attention: Customer Service - AODA.

External employment related inquiries, may be made by:

- calling (905) 876-4611;
- faxing at (905) 876-2044;
- emailing the inquiry to hr@Miltonhydro.com – Attention: Human Resources – AODA;
- mailing the inquiry to Milton Hydro, 200 Chisholm Dr, Milton, ON L9T 3G9 – Attention: Human Resources – AODA.

In the event an external question or concern is not resolved, a letter should be sent to: Milton Hydro, 200 Chisholm Dr, Milton, ON L9T 3G9, Attention: Vice-President of Finance – AODA.

7.2 All Internal Employment Related Inquiries:

Internal employment related inquiries or concerns may be directed to the employee's supervisor, or other normal contact.

8.0 REFERENCES AND RELATED DOCUMENTS

- Accessibility for Ontarians with Disabilities Act, 2005
- Ontario Regulation 191/11, Integrated Accessibility Standards
- Ontario Human Rights Code
- Town of Milton Annual Accessibility Plan, 2009
- Ontario regulation 31/05 under the Food Safety and Quality Act, 2001
- Ontario Regulation 562 under the Health Protection and Promotion Act
- Town of Milton Animal Control By-law No. 137-2008
- Dog Owner's Liability Act
- Other Accessibility Standards as approved into Regulation