

## AODA Multi-Year Accessibility Plan

Initiative	IASR Requirement	Action	Responsible	Compliance Date
<b>Part 1 – General Requirements</b> <ul style="list-style-type: none"> <li>Develop accessibility policies and a multi-year accessibility plan</li> <li>Report annually on the progress of the multi-year plan</li> <li>Ensure staff and volunteers have been trained on the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code</li> </ul>				
1.1 Establishment of Accessibility Policies	Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<ul style="list-style-type: none"> <li>Establish Integrated Standards Policy</li> </ul>	Completed by HR Department	January 1, 2014 Updated in May 2021.  The previous policy focused mainly on the Customer Service Standards.
1.2 Accessibility Plans	Large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years	<ul style="list-style-type: none"> <li>develop a multi-year accessibility plan that meets the current requirements of the IASR</li> <li>Summitt Energy's accessibility plan will be posted on our external website &amp; will be provided upon request in an accessible format</li> <li>Summitt Energy will comply by the AODA requirements by reviewing our accessibility plan minimum once every 5 years</li> </ul>	Completed by HR Department & Executives  Completed by Marketing Department  Will be executed by HR Department	January 1, 2016  May 11, 2016  Revised May, 2021 and Ongoing.
1.3 Self Service Kiosks	Have regard to the accessibility for persons with disabilities when	At this time self-service kiosks are not in use. Should this status change, Summitt Energy will ensure compliance with the AODA.	To be completed by HR	

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	designing, procuring or acquiring self-service kiosks.		Department if required	
1.4 Training	Ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) All other persons who provide goods, services or facilities on behalf of the organization.	<ul style="list-style-type: none"> <li>• Assess training needs (e.g., separate training for managers and employee levels)</li> <li>• Review current training to determine how IASR training requirements could be implemented to develop additional training to educate staff and managers on AODA legislation, IASR and Human Rights Code</li> <li>• Determine vehicle to deliver training (e.g. online or group sessions)</li> <li>• Training will incorporate accessible format upon request</li> <li>• Training will be provided to all employees, volunteers, contractors and third parties acting on behalf of Summitt Energy</li> <li>• Training will be tracked &amp; recorded in employee file</li> </ul>	In progress by HR Department	January 1, 2014, Revised in May 2021 and Ongoing.
<b>Part 2 – Information and Communication Standards</b> <ul style="list-style-type: none"> <li>• Accessible websites &amp; web content</li> <li>• Accessible feedback process</li> <li>• Accessible formats and communication supports</li> </ul>				
2.1 Feedback	Ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for accessible formats and communication support upon request.	<ul style="list-style-type: none"> <li>• Ensure Summitt Energy website incorporates an on-line feedback process fully accessible in other formats, upon request</li> <li>• As needed, update current process for requesting accessible formats—including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual</li> <li>• Develop understanding of current accessible formats, information and communication and technology tools available at Summitt Energy to adequately respond to requests for accessible formats that take into consideration the requestor's disability needs</li> </ul>	Completed by HR & Marketing Departments  Completed by HR Department upon request  Completed by HR Department & Marketing Department	May 11, 2016

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2.2 Accessible Formats & Communication Supports	Upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person’s accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons	<ul style="list-style-type: none"><li>• As needed, update current process for requesting accessible formats—including alternative methods of feedback if what is in place or is available doesn’t meet the needs of the individual</li><li>• Develop communication strategy for educating Summitt Energy staff on the availability of and process for requesting accessible formats and communication supports</li></ul>	To be completed by HR Department upon request  Completed by HR Department	January 1, 2016  May 11, 2016
	2.2.2 Consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"><li>• Understand functionality of accessible formats and communication supports available to better consult on requests for accessible formats that take into account the individual’s disability needs</li></ul>	Completed by HR Department upon request	May 11, 2016
	2.2.3 Notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"><li>• Incorporate language in marketing materials and website to advise that, in accordance with AODA, accessible format may be made available on request.</li></ul>	HR Department	Ongoing.
2.3 Accessible Websites & Web Content	Make Summitt Energy website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	<ul style="list-style-type: none"><li>• Conducted an assessment of current web functionality to ensure compliance and adequacy of accessibility features</li><li>• Ensure Technology and Content Owners (IT and Marketing) are aware of IASR requirements for existing web content</li><li>• All internet websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live) success criteria 1.2.5 Audio Descriptions (Pre-recorded)</li></ul>	Completed by Marketing & IT Departments  Completed by Marketing & IT Departments	May 11, 2016 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.  Ongoing.
<b>Part 3 – Employment Standards</b> <ul style="list-style-type: none"><li>• Recruitment, assessment and selection</li><li>• Accessible formats and communication supports for employees</li><li>• Workplace emergency response</li></ul>				

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<ul style="list-style-type: none"> <li>• <i>Return to work processes</i></li> <li>• <i>Performance management, career development and redeployment</i></li> </ul>				
3.1 Recruitment, General	Notify employees and the public about the availability of accommodation for applicants with disabilities in recruitment processes.	<ul style="list-style-type: none"> <li>• Existing recruitment policies, procedures and processes reviewed &amp; language incorporated on postings and Summitt Energy career section of website to make applicants aware that in accordance with the AODA, accommodation is available</li> </ul>	Completed by HR Department	May 11, 2016 and Ongoing.
3.2 Recruitment, Assessment or Selection Process	3.2.1 Review existing recruitment policies, procedures and processes	<ul style="list-style-type: none"> <li>• Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request</li> </ul>	Completed by HR Department	January 1, 2015 And Ongoing.
	3.2.2 Update recruitment process to ensure applicants who are selected for an interview or assessment, are notified that accommodation is available upon request	<ul style="list-style-type: none"> <li>• Potential candidates are currently advised to inform Summitt Energy if an accommodation is required for an interview</li> </ul>	Completed by HR Department	May 11, 2016 and Ongoing.
3.3 Notice to Successful Applicants	When making an offer of employment, notify the successful applicant of policies for accommodating employees with disabilities	<ul style="list-style-type: none"> <li>• Incorporate in offer letter a section regarding Summitt Energy's accessibility policies and where to access additional information</li> </ul>	Completed by HR Department	May 11, 2016
3.4 Informing Employees of Supports	3.4.1 Inform employees of policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs.	<ul style="list-style-type: none"> <li>• Create accommodation procedures</li> <li>• Inform employees of policies to support employees with disabilities</li> </ul>	Completed by HR Department	May 11, 2016
	3.4.2 Employers shall provide the information required	<ul style="list-style-type: none"> <li>• Accessibility policies and processes to be Incorporated in onboarding process for Ontario</li> </ul>	Completed by HR Department	December 31, 2014

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	under this section to new employees as soon as practicable after they begin their employment.			
	3.4.3 Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	<ul style="list-style-type: none"> <li>• Communicate policy changes and/or updates in regards to accommodation with respect to disabilities</li> </ul>	Completed by HR Department	Ongoing.
3.5 Accessible Formats and Communication Supports for Employees	3.5.1 Where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace	<ul style="list-style-type: none"> <li>• Educate employees on the availability of accessible formats and communication supports in accordance with the AODA</li> <li>• Educate employees on the process for requesting accessible formats and communication supports</li> </ul>	Completed by HR Department	December 31, 2014, Updated May 19, 2021 and Ongoing.
	3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> <li>• Develop a process for consulting with employees to determine accommodation needs</li> <li>• Develop a process for advising employee of solution</li> </ul>	Completed by HR	December 31, 2014, Updated May 19, 2021 and Ongoing.
3.6 Workplace Emergency Response Information	3.6.1 Provide individualized workplace emergency response information	<ul style="list-style-type: none"> <li>• Review Summitt Energy's emergency response processes and adjust if necessary to include AODA's requirements in regards to</li> </ul>	Completed by HR Department	January 1, 2014 & Ongoing.

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	to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	individualized workplace emergency response • Determine via email, who requires individualized help during an emergency situation		
	3.6.2 If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	• Once the employees who require individualized emergency response have been determined, Summitt Energy will obtain consent from the applicable employee to share the information with those designated to provide assistance in the event of an emergency	Completed by Departmental Management & HR Department	Ongoing.
	3.6.3 Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	• Human Resources will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible	HR Department	Ongoing.
	3.6.4 Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization;	• Review information when the employee moves to a different location &/or when employee's accommodation needs or emergency response policies are reviewed	HR Department	Ongoing.

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	(b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies			
3.7 Documented Individual Accommodation Plans	3.7.1 Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	<ul style="list-style-type: none"> <li>• Review current accommodation processes and practices</li> <li>• Document individualized accommodation procedures in accordance with AODA</li> </ul>	Completed by HR Department	December 31, 2014 & Ongoing.
	3.7.2 The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved.	<ul style="list-style-type: none"> <li>• Documented plans will incorporate the following elements: <ul style="list-style-type: none"> <li>a) Manner in which employee can request</li> <li>b) Under which circumstances medical is required</li> <li>c) Who (Sunlife &amp; Third Party Benefits Consultant) will be assessing the medical provided - Work with Sunlife &amp; Third Party Benefits Consultant (disability partner) to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests</li> </ul> </li> </ul>		Ongoing.

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	4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.			
	5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.	<p>d) Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (Sunlife &amp; Third Party Benefits Consultant) and what information may be shared</p> <p>e) Communication to the employee will be done via email or formal letter and/or a means of communication that will take into consideration the employee's disability if their request for accommodation is declined or if accepted, the plan in which the accommodation will entail</p> <p>• Train Summitt Energy staff and Managers on the Accessibility policies, processes and procedures for requesting individual plans</p>		
3.8 Return to Work Process	Develop and have in place a return to work process for Summitt Energy employees who have been absent	<ul style="list-style-type: none"> <li>• Review the current return to work process</li> <li>• Update and document return to work process based on gaps and compliance requirements</li> </ul>	Completed by HR Department & Departmental Management	January 1, 2014, Updated May 19, 2021 and Ongoing.



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	from work due to a disability and require disability-related accommodations in order to return to work and document the process			
3.9 Performance Management	An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	<ul style="list-style-type: none"> <li>• Assess current performance review processes to ensure accessibility features are incorporated (i.e., assessable forms, conversations in plain text).</li> <li>• Ensure updated/new performance management processes incorporate accessibility features</li> <li>• Ensure training and communication to managers provide awareness on effective communication strategies and timing to allow for employees to review and understand feedback, prior to a meeting</li> </ul>	Completed by HR Department	January 1, 2014 and Ongoing.
3.10 Career Development & Advancement	Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to employees with disabilities.	<ul style="list-style-type: none"> <li>• Review current training and professional development materials to ensure accessibility requirements are implemented</li> <li>• Ensure all future training and materials are created with accessibility requirements in mind</li> <li>• Ensure career promotion criteria, practices and processes take into account individual accommodation needs</li> <li>• Track career progression of individuals with disabilities</li> </ul>	Completed by HR Department	January 1, 2014 and Ongoing.
3.11 Redeployment	An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying	<ul style="list-style-type: none"> <li>• Review and update current transfer and redeployment practices and processes to ensure accommodation plans are referenced</li> <li>• Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs</li> </ul>	Completed by HR Department & Department Manager	January 1, 2014

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	employees with disabilities.			
<b>Part 4 – Customer Service Requirements</b> <ul style="list-style-type: none"> <li>• <i>Establishment of Policies, Practices and Procedures</i></li> <li>• <i>Use of Service Animals and Support Persons</i></li> <li>• <i>Notice of Temporary Disruptions</i></li> <li>• <i>Feedback Process for Providers of Goods or Services</i></li> <li>• <i>Notice of Availability of Documents</i></li> <li>• <i>Format of Documents</i></li> </ul>				
4.1 <i>Establishment of Policies, Practices and Procedures</i>	Every provider of goods or services shall establish policies, practices and procedures governing the provision of its goods or services to persons with disabilities. O. Reg. 429/07, s. 3 (1)	Summitt has: Integrated Accessibility Standards Policy and Accommodation Policy and Procedures created that are regularly updated.	HR Department	January 1, 2014 Updated in May 2021.
4.2 <i>Use of Service Animals and Support Persons</i>	This section applies if goods or services are provided to members of the public or other third parties at premises owned or operated by the provider of the goods or services and if the public or third parties have access to the premises. O. Reg. 429/07, s. 4 (1)	<b>Service Animals:</b> Summitt Energy is committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public.  <b>Support Persons:</b> If a customer with a disability is accompanied by a support person, we 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 of the customer may be discussed, consent to discuss such information in front of the support person will be obtained from the customer, prior to any confidential information being discussed	HR Department	May 11, 2016 and Ongoing.
4.3 <i>Notice of Temporary Disruptions</i>	If, in order to obtain, use or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the	Summitt Energy will provide customers with prompt notice in the event of a planned or unexpected disruption to services or facilities for people with disabilities. This notice will include information about the reason for disruption, its anticipated	HR and Marketing Department	May 11, 2016 and Ongoing.

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	<p>provider and if there is a temporary disruption in those facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 429/07, s. 5 (1).</p> <p>(2) Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. O. Reg. 429/07, s. 5 (2).</p> <p>(3) Notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider of goods or services, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 429/07, s. 5 (3).</p> <p>(4) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare a document that sets out the steps to be taken in connection with a temporary disruption and, upon</p>	<p>length of time, and a description of alternative facilities or services available.</p> <p>The notice will be placed at all public entrances (where applicable), reception counter and on Summitt Energy's website.</p>		
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	request, shall give a copy of the document to any person. O. Reg. 429/07, s. 5 (4).			
4.4 <i>Feedback Process for Providers of Goods or Services</i>	<p>Every provider of goods or services shall establish a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and shall make information about the process readily available to the public. O. Reg. 429/07, s. 7 (1).</p> <p>(2) The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise. O. Reg. 429/07, s. 7 (2).</p> <p>(3) The feedback process must specify the actions that the provider of goods or services is required to take if a complaint is received. O. Reg. 429/07, s. 7 (3).</p>	<p>Summitt Energy will ensure that there is a feedback process readily available to our customers in order to allow people with disabilities to provide feedback regarding their experience with or concerns about access to services for people with disabilities. Feedback communications may be conducted in the following manner;</p> <p>Telephone: 905-366-7000 Email: <a href="mailto:accessibility@summittenergy.ca">accessibility@summittenergy.ca</a> Mail: Summitt Energy Attention: Human Resources 100 Milverton Drive, Suite 608 Mississauga, ON 5R 4H1</p> <p>Feedback forms are available at the website as well.</p> <p>Customers can expect to hear back within five (5) business days from date of receipt. Response time to the feedback will depend on the issue, but will not exceed fifteen (15) business days unless there are extenuating circumstances involved.</p>	HR and Marketing Department	May 11, 2016 and Ongoing.
4.5 <i>Notice of Availability of Documents</i>	Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario	The IASR Policy posted on the website states that when a request is received, information and communication will be provided in an accessible format for people with disabilities.	HR and Marketing Department	January 1, 2014, Updated - May 19, 2016 and Ongoing.

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	<p>shall notify persons to whom it provides goods or services that the documents required by this Regulation are available upon request. O. Reg. 429/07, s. 8 (1).</p> <p>(2) The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 429/07, s. 8 (2).</p>			
4.6 <i>Format of Documents</i>	<p>Format of Documents</p> <p>(1) If a provider of goods or services is required by this Regulation to give a copy of a document to a person with a disability, the provider shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability. O. Reg. 429/07, s. 9 (1).</p> <p>(2) The provider of goods or services and the person with a disability may agree upon the format to be used for the document or information. O. Reg. 429/07, s. 9 (2).</p>	<p>Accessible formats and communication supports are available and will be provided in a timely manner and at a cost that is not more than the regular costs charged to other people.</p> <p>All of our pdf documents are easily accessible by a screen reader – contact our Marketing Department on behalf of the customer, if the customer is having difficulty</p>	HR and Marketing Team	January 1, 2014 Updated - May 19, 2016 and Ongoing.