

STANDARDS OF CONDUCT: Integrated Accessibility Standards Policy

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1.0 Purpose

The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) is provincial legislation with the purpose of developing, implementing and enforcing accessibility standards in order to achieve and maintain accessibility for persons with disabilities in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 and its regulations.

As per the Ontario Regulation 191/11 Ontario businesses must follow the Integrated Accessibility Standards Regulation (IASR) to prevent and remove barriers for people with disabilities. Integrated Accessibility Standards is a grouping of five standards that the Accessibility for Ontarians with Disabilities Act (AODA) developed.

The IASR includes five standards in the areas of:

- Customer service
- Information and communication
- Employment
- Transportation
- Design of Public space

2.0 Revision History

Date	Revision Number	Change	Reference Section
May 1, 2014	1.0	Accessibility Standard for Customer Service Policy created	Not applicable
May 9, 2016	1.1	Revisions and Updates	All sections
June 15, 2021	2.0	The policy was updated to the Integrated Accessibility Standards Policy	Section 11 and 12
July 10, 2026	3.0	Revisions and Updates	Section 3, 4, 6 and 8

3.0 Scope and Applicability

- 3.1** All employees of the Company.
- 3.2** Managers, Directors, Executives who have direct staff management responsibilities.
- 3.3** Customers and visitors to company premises.
- 3.4** Third-party agencies and contractors are responsible for ensuring their own employees comply with applicable accessibility requirements. Summitt Energy will ensure that required accessibility information is communicated and that contractual expectations are clearly defined.

4.0 Policy

- 4.1** The Company is committed to treating people with disabilities, consistent with the principles of independence, dignity, integration and equality of opportunity. Summitt is dedicated to meet the needs of persons with disabilities and will do so by ensuring compliance with Ontario's accessibility laws and by identifying, preventing and removing barriers to accessibility.
- 4.2** The Company maintains a Multi-Year Accessibility Plan in accordance with the Accessibility for Ontarians with Disabilities Act (AODA). The plan outlines the Company's strategy to prevent and remove barriers and meet current and future accessibility requirements. The plan is reviewed and updated at least once every five (5) years and is available in an accessible format upon request.

5.0 Definitions

- 5.1 Accessible:** Accessible is defined as something that can be easily accessed or used by a person with a disability.
- 5.2 Accommodations:** Accommodations are measures used to make something accessible to an individual with a disability. Provision of assistive devices or services, changes to policies, programs or procedures, allowing a person with a disability to participate, even though they may participate differently, are some examples of accommodations.
- 5.3 Adaptive or Assistive Devices:** Adaptive or assistive devices include tools such as computers or special communication devices that facilitate access to information or services for people with disabilities. Assistive devices may also include registered service animals. Technology solutions may be simple, such as enabling existing features on the Company's computers, or more complex involving unique combinations of hardware and software, such as those needed for voice or Braille output.
- 5.4 Assistive Device:** An assistive device is any device used by people with disabilities to help with daily living. Assistive devices include a range of products such as:
- Amplification devices that boost sound for listeners who are hard of hearing without amplifying background noise
 - Communication boards used to communicate using symbols, words or pictures
 - Electronic communication devices
 - Electronic notebooks or laptop computers
 - Hearing aids
 - Oxygen tanks
 - Personal data managers
 - Scooters
 - Wheelchairs
 - Walkers
 - White canes
- 5.5 Customers:** Customers include members of the public.
- 5.6 Customer Service:** Customer service is the provision of services for customers.

- 5.7 Disability:** Disability as defined in the *Access for Ontarians with Disabilities Act, 2005*, means: a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness; b) a condition of mental impairment or a developmental disability; c) a learning disability or a dysfunction on one or more of the processes involved in understanding or using symbols or spoken language; 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*.
- 5.8 Disruption of Service:** A disruption of service is when facilities or services (e.g. escalators and elevators, accessible washrooms and amplification systems) are temporarily unavailable or are expected to be temporarily unavailable in the near future.
- 5.9 Equality:** Equality means not only treating people the same way but also may mean treating people differently in order to ensure that they have access to information and services equal to people without disabilities.
- 5.10 Medical Needs:** Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.
- 5.11 Readily apparent:** It is "readily apparent" that an animal is a service animal when it is obvious by its appearance or by what it is doing. For example, a service animal may wear a harness, saddle bags, or a sign/clothing that identifies it as a service animal; or it has a certificate or identification card from a service animal training school; or it has an identification card from the Attorney General of Ontario. It may also be readily apparent if a person is using the animal to assist him or her in regular activities, such as opening doors or retrieving items.
- 5.12 Service Animal:** A service animal is an animal that assists because of a person's disability and this is either readily apparent or is supported by a letter from a physician or nurse. Examples of service animals include those used by people who have vision impairment, to alert people who are deaf, deafened or hard of hearing; those used by people to alert an individual to an oncoming seizure and lead them to safety; and those used by people to interact with an individual with Autism Spectrum Disorder and to stop them from fleeing in order to ensure safety. The customer service standard's provisions also apply to animals providing other services to people with disabilities.
- 5.13 Support Person:** A support person is an individual chosen by a person with a disability to provide services or assistance with communication, mobility, personal care needs, medical needs or access to goods or services. A support person is distinct from an employee who provides support services to a customer. A support person could be a paid professional, a volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.

6.0

Commitment and Responsibilities

- 6.1** Executives, hiring managers and human resources are responsible for ensuring compliance with this policy and procedure.

6.2 The Company (including all departments and staff) is responsible for:

- Ensuring compliance with the *Accessible Customer Service Regulation (O. Reg. 191/11)*, including *Customer Service Standards*
- Including accessibility in annual planning processes;
- Budgeting for accessibility requirements;
- Supporting staff attendance at required training;
- Notifying the human resources department of additional training requirements;
- Communicating with a person with a disability regarding the use of a service animal, support person or assistive device;
- Coordinating and/or providing service to a person with a disability who may use a service animal, support person or assistive device;
- Providing notification of service disruptions; and
- Providing all documents in appropriate formats upon request by a person with a disability.

6.3 Human Resources is responsible for:

- Communicating to all departments regarding all requirements under the regulation;
- Monitoring the progress of legislative requirements in order to ensure compliance;
- Reporting to the Ministry of Community and Social Services on compliance requirements;
- Working with relevant committees to develop policies, procedures and practices;
- Communicating all policies, procedures and practices to staff; and
- Attending professional development activities to keep current on regulations and best practices.
- Notifying applicants during recruitment about the availability of accommodations
- Notifying new hires about accommodation policies
- Accounting for the accessibility needs of employees with disabilities in performance management and advancement decisions
- Developing a process for individual accommodation plans
- Providing information in an accessible format and with communication support to those employees with disabilities who request it
- Monitoring progress against the Multi-Year Accessibility Plan and ensuring updates are completed in accordance with legislative requirements.

6.4 The Customer is responsible for:

- Caring and controlling their service animal while accessing goods or services;
- Providing service animal certification upon request;
- Providing input when requested in order to work out service discrepancies;
- Utilizing a feedback process to provide comments on service;
- Self-identifying as having a disability for which they require assistance in accessing the Company's goods and services and communicating such to the appropriate Company staff; and
- Participating in the development of suitable mode(s) of accommodation/assistance.

7.0 Accessible Customer Service Plan

7.1 The Company is committed to excellence in serving all customers including people with disabilities. The Company is committed to training all employees who deal with the public or other third parties on their behalf.

7.2 Assistive Devices

To establish a procedure that will welcome customers to the Company's office by committing Company staff to providing services that respect the independence and dignity of people with disabilities, including, but not limited to, the use of assistive devices. Refer to section 5.0 Definitions for a list of devices. The Company will ensure that its employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing its goods or services.

7.3 Assistive Devices Procedure

The Human Resources department and management will ensure that staff is trained to support customers who may use assistive devices while accessing Company goods and services.

- 7.3.1 Training will be focused on how to interact with people using assistive devices rather than on the technical use of the assistive devices.
- 7.3.2 The Company will post a notice in the reception area that indicates the Company welcomes the use of assistive devices and encourages users to seek support from staff as they require it.
- 7.3.3 The Company's website will indicate that the Company provides accessible customer services to people with disabilities, consistent with the principles of independence, dignity, integration and equality of opportunity, and assist people with disabilities with the use of assistive devices.

7.4 Communication

The Company will communicate with people with disabilities in ways that take into account their disability.

7.5 Service Animals

The Company welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

7.6 Service Animals Procedure

Company staff will be properly trained in how to interact with people with disabilities who are accompanied by a service animal. Any person with a disability who is accompanied by a service animal will be welcomed to the Company office.

- 7.6.1 The Company will ensure that access is granted in accordance with security procedures and only to those areas of the premises where the customer customarily has access.
- 7.6.2 A service animal can only be excluded from access to the Company's premises where this is required by another law (e.g. *Health Protection and Promotion Act*).
- 7.6.3 Consideration should be given to options available prior to the exclusion of a service animal where there is a risk to the health and safety of another person as a result of the presence of a service animal (e.g. where an individual has a severe allergy to the service animal). For example, creating space between the two individuals concerned or making reasonable alterations to schedules.

- 7.6.4 A service animal can be excluded if it is of a breed that is prohibited by law (e.g. *Dog Owners' Liability Act*, which places restrictions on pit bull terriers).
- 7.6.5 In the rare instance where a service animal must be excluded, the Company must make every effort to put alternative arrangements in place to provide the services required by the person with a disability (e.g. discuss with the person how best to serve them - a person with a vision disability might need an individual to guide them).
- 7.6.6 The Company shall preserve the confidentiality of the letter from a physician or nurse confirming that the animal is needed because of a disability and information contained in the letter and not disclose the information to external resources as the information is for internal Company use only.
- 7.6.7 Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, the Company should ask the person using the service animal for a letter from a physician or nurse confirming that the animal is needed because of a disability (note: the letter does not need to identify the disability, why the animal is needed or how it is used).
 - a. Request to keep a copy of the letter on file, but only as long as required by the circumstances; or
 - b. Ask the person using the service animal to bring a letter with them on occasions when they visit the Company office.

7.7 Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them in the Company office.

- 7.7.1 The Company will ensure that staff receives training in interacting with people with disabilities who are accessing the Company's services accompanied by a support person.
- 7.7.2 The Company will ensure that any person with a disability who is accompanied by a support person is welcomed at the Company's office with his or her support person.
- 7.7.3 The Company will ensure that access is granted in accordance with security procedures and only to those areas of the premises where customers customarily have access.
- 7.7.4 The Company will consult with the person with the disability who requires the presence of a support person on the premises prior to the person with the disability attending at the Company's office.

7.8 Support Persons' Confidentiality

- 7.8.1 For customers who require the assistance of a support person, a Company's staff will secure consent in writing regarding the disclosure of confidential information in the presence of the support person, when accompanied by a support person for the purpose of assisting in a discussion that may involve confidential information;
- 7.8.2 For customers who require the assistance of a support person, a Company's staff will secure consent in writing regarding the disclosure of confidential information if a different support person is used for subsequent meetings; and
- 7.8.3 A support person shall provide assurance in writing to the Company's staff to safeguard confidential information when assisting in a discussion concerning a customer.

7.9 Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, including access to the Company's telephone system, website, and office at 100 Milverton Drive, Suite 608, the Company will notify customers promptly.

7.9.1 This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

7.9.2 The notice will be placed on the Company's website in English and French, and will be posted in the reception area.

8.0 Training for Staff

The Company will provide training to all employees who deal with the public or other third parties on their behalf. Training will be provided to new staff within one month of the start of employment with the Company. Training will include:

- Overview of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard.
- The Company's accessible customer service plan.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- How to use the Teletypewriter (TTY).
- What to do if a person with a disability is having difficulty in accessing the Company's goods and services.
- Staff will also be trained when changes are made to the Company's accessible customer service plan.
- The Company will maintain records of accessibility training, including the dates training was provided and the number of individuals trained.

Training will be provided to employees on an ongoing basis, including when there are changes to accessibility legislation, standards, or this policy.

9.0 Feedback Process

The Company will take into account the impact on people with disabilities when purchasing new equipment, designing new systems or planning a new initiative.

9.1 The Company will ensure that there is a feedback process readily available both in print and via web to the 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. Accessible formats and communication supports for the feedback process will be provided upon request.

9.2 Feedback shall be received in any form (e.g. in person, telephone (TTY), in writing, fax, or in electronic format including email) and all such documents will be logged.

9.3 Customers who wish to provide feedback on the way the Company provides goods and services to people with disabilities can do so verbally and by e-mail.

9.4 All feedback will be directed to Human Resources and the executives. Customers can expect to hear back within five (5) business days from the date of receipt. Response time to the feedback will depend on the issue, but will not exceed 15 business days unless there are extenuating circumstances involved. Complaints will be addressed according to the Company's regular complaint management procedures.

10.0 Availability of documents

- 10.1** Summitt will provide documents required under Regulation 429/07 section 8 upon request.
- 10.2** If the Company is required to provide a copy of a document to a person with a disability, the Company will take into consideration the person's disability and provide that document in an appropriate format. The Company and the person with a disability will agree on what format will be used.
- 10.3** The request for the documentation can be submitted by mail, e-mail or phone.
Email: accessibility@summittenergy.ca
Telephone: 905-366-4464
Mail: 100 Milverton Drive, Suite 608, Mississauga, Ontario L5R 4H1
Attention: "Human Resources"
- 10.4** Any policy of the Company that does not respect and promote the dignity and independence of people with disabilities will be modified or removed by the company's executive.

11.0 Employment Standards

- 11.1 General Recruitment, Assessment and Selection Process:** Summitt will notify candidates under consideration for employment about the availability of accommodation for applicants with disabilities during the recruitment process. Summitt has and will include the following statement on all job postings and recruitment information: *"Summitt Energy welcomes and encourages applications from people with disabilities. Accommodations are available upon request for candidates taking part in all aspects of the selection process."* Summitt will make every effort to provide accommodations throughout the recruitment, assessment, and selection processes. If a selected applicant requests an accommodation, Summitt will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation that considers the applicant's accommodation request and accessibility needs.
- 11.2 Notice to Successful Applicants:** When making offers of employment, Summitt will notify the successful applicant of its policies for addressing accommodation requests from employees with disabilities. It is clearly mentioned on our offer letters that: *"Summitt Energy has an accommodation process in place that provides accommodations for employees with disabilities. If you require a specific accommodation because of a disability or a medical need, please contact our Human Resources team at 905-366-4464 or by e-mail at: employeerelations@summittenergy.ca. This will ensure that the appropriate accommodations are in place before you begin your employment."*
- 11.3 Accessible Formats and Communication Supports for Employees:** When requested, Summitt will provide information and communications in an accessible manner to its employees. All of our pdf documents are easily accessible by a screen reader.
- 11.4 Workplace Emergency Response Information:** Where required, Summitt Energy will create individual workplace emergency response information for employees with disabilities. This information will account for the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee. This information will be reviewed when:
- The employee moves to a different physical location in the organization;
 - The employee's overall accommodation needs or plans are reviewed; or
 - Summitt Energy reviews general emergency response policies.

11.5 Performance Management and Career Development and Advancement: Summitt Energy will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be constructed as required.

11.6 Return to Work Process: Summitt Energy will develop and implement return-to-work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work. The return-to-work process outlines the steps Summitt Energy will take to facilitate the employee's return to work and will use documented individual accommodation plans as outlined by the regulation.

12.0 Information and Communications Standards

12.1 Feedback: Summitt will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities. Summitt will notify the public about the availability of accessible formats and communications supports related to its feedback process (same as section 9).

12.2 Accessible Formats and Communication Supports: Upon request, Summitt will provide, or arrange for the provision of, accessible formats and communication supports for persons with disabilities. This will occur at no cost, in a timely manner and will take into account the person's accessibility needs and request.

- Summitt will consult with the person making the request when determining the suitability of an accessible format or communication support that meets their needs. Unless deemed unconvertible, Summitt Energy will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities upon request.

- The request for documentation in an accessible format can be submitted via mail, e-mail or phone.

Email: accessibility@summittenergy.ca

Telephone: 905-366-4464

Mail: 100 Milverton Drive, Suite 608, Mississauga, Ontario L5R 4H1

Attention: "Human Resources"

12.3 Emergency Procedures, Plans and Public Safety Information: Summitt will ensure that all publicly available safety and emergency information, such as evacuation procedures and floor plans, are provided in an accessible format or with appropriate communication supports upon request.

12.4 Accessible Websites and Web Content: Summitt will ensure that our website and web content conform to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements. **Exceptions:** The Information and Communications Standards do not apply to: Products and product labels; Unconvertible information or communications; or Information that the organization does not control either directly or indirectly through a contractual relationship.

12.5 Unconvertible Information or Communications: If it is determined in consultation with the requesting party that information or communications are unconvertible, Summitt will ensure that the individual who made the request is provided with an explanation and a summary of the information. Summitt Energy will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

CONFIDENTIALITY AGREEMENT
BETWEEN:
[Support person]
- and -
Summitt Energy Inc. ("Summitt")

WHEREAS, as a result of you acting in the capacity of a Support Person on behalf of [name], the, you have access to Confidential Information (defined below);

AND WHEREAS Confidential Information must be kept strictly and absolutely confidential and always handled as required by the Company in accordance with its practices, procedures and its policies (as any may be issued, adopted, amended, or replaced from time to time), and as required by any other applicable privacy legislation in force from time to time;

AND WHEREAS the Company will not provide you with access to Confidential Information unless you enter into this Agreement;

THE PARTIES AGREE:

1. In this Agreement:
 - a) "Confidential Information" means any information, in any form or medium, that is disclosed to or acquired by the Support Person in the course of, or in connection with, their role in assisting an individual, including but not limited to personal information, employment-related information, medical or accommodation-related information, and any other information that is identified as confidential or that would reasonably be considered confidential given the nature of the information and the circumstances of its disclosure;
 - b) "Personal Information" means any information about an identifiable individual;
 - c) "Support Person" means a Support Person as defined in the *Accessibility for Ontarians with Disabilities Act, 2005 sec. 4(8)*; and
2. You agree not to remove any Confidential Information from the Company's premises unless, and to the extent that, you obtain the Company's written pre-authorization. At all times, you agree to take all necessary steps to keep Confidential Information secure and to protect such Confidential Information from unauthorized use, reproduction or disclosure.
3. You have an obligation to familiarize yourself and to comply with all policies, practices and procedures of the Company relating to privacy and security, including any policies, practices and procedures implemented from time to time after the date of this Agreement.
4. If you are ever notified by any person that you have a legal or professional obligation to disclose any Confidential Information, you will immediately notify Human Resources and/or the Chief Financial Officer before making such disclosure. In such a circumstance, you agree to cooperate with the Company to use all reasonable efforts to minimize the extent of such disclosure and to obtain an undertaking or other assurance from the recipient to maintain the confidentiality of the disclosed Confidential Information.

5. You agree to notify the Company in writing immediately upon becoming aware of any breach of this Agreement.
6. This Agreement is in addition to, and not in substitution for, all other obligations owed by you to the Company.
7. Your obligations as the Support Person under this Agreement shall survive the termination or conclusion of your involvement with the Company and/or the individual you are assisting, and shall continue indefinitely with respect to all Confidential Information obtained during the course of that involvement.
8. If any provision of this Agreement shall, to any extent, be invalid or unenforceable, the remainder of this Agreement shall not be affected thereby and each provision of this Agreement shall be valid and enforced to the fullest extent permitted by law and be independent of every other provision of this Agreement.
9. The failure of any party to this Agreement to enforce at any time any of the provisions of this Agreement or any of its rights in respect thereto or to insist upon strict adherence to any term of this Agreement will not be considered to be a waiver of such provision, right or term or in any way to affect the validity of this Agreement or deprive the applicable party of the right thereafter to insist upon strict adherence to that term or any other term of this Agreement.
10. The provisions of this Agreement shall be governed by and construed in accordance with the laws of Ontario and the laws of Canada applicable therein and the parties hereby agree that the courts of Ontario will have non-exclusive jurisdiction with respect to this Agreement.
11. You hereby acknowledge receipt of this Agreement and you hereby consent to disclosure by the Company of the fact that you have signed this Agreement.

ENTERED INTO this day of , 202_

Witness Signature

Support Person Signature

Human Resources or designate Signature

Appendix A

Acknowledgement Form

**Integrated Accessibility Standards Regulation
Information and Communications Standards (s. 16, O. Reg. 191-11)**

To ensure the delivery of high-quality education to our employees, Summitt Energy Inc. ("Summitt") has adopted accessibility standards in accordance with Ontario Regulation 191/11.

This training complies with the regulation requirements to provide staff with accessibility awareness training. It includes introduction information related to accessible program including course delivery and instruction. You are required to acknowledge that you have received, understood and completed this training.

I, _____, acknowledge that I have read, understood and completed the Integrated Accessibility Standards Regulation and Information and Communications Standards (s. 16, O. Reg. 191-11) training.

Employee Signature

Date