

AODA MULTI-YEAR ACCESSIBILITY PLAN

Summitt Energy continues to meet its obligations under the Accessibility for Ontarians with Disabilities Act (AODA) and Integrated Accessibility Standards Regulation (IASR), and will maintain compliance through ongoing monitoring, training, and policy updates.

Initiative	IASR Requirement	Action	Responsible	Compliance Date
Part 1 – General Requirements - Develop accessibility policies and a multi-year accessibility plan - Review and update the multi-year accessibility plan at least every five years - Ensure staff and volunteers have been trained on the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code				
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.	Establish Integrated Standards Policy	HR Department	Accessibility Policy established on January 1, 2014 Revised in May 2021 – updated to Integrated Accessibility Standards Policy. Latest revision in June 2026.
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	- Develop a multi-year accessibility plan that meets the current requirements of the IASR - Summitt Energy's accessibility plan will be posted on our external website & will be provided upon request in an accessible format - Summitt Energy will comply by the AODA requirements by reviewing our accessibility plan minimum once every 5 years CURRENT PRACTICE The plan is updated and reposted minimum once every 5 years and as changes occur	HR Department & Executives HR & Marketing Department HR Department	January 1, 2016 Effective May 11, 2016, and ongoing. Effective May 11, 2016, and ongoing. Revisions: May 2021 July 2026

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1.3 Self Service Kiosks	Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	CURRENT PRACTICE At this time self-service kiosks are not in use. Should this status change, Summitt Energy will ensure compliance with the AODA.	HR & Marketing Department	
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.	• Assess training needs (e.g., separate training for managers and employee levels) • 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 • Determine vehicle to deliver training (e.g. online or group sessions) • Training will incorporate accessible format upon request • Training will be provided to all employees, volunteers, contractors and third parties acting on behalf of Summitt Energy • Training will be tracked & recorded in employee files CURRENT PRACTICE Training is provided to all employees through Citations Canada, and training records are maintained within their Citations account.	HR Department, Compliance Department and Third parties contractually tied up with Summitt for Sales.	Effective: January 1, 2014 Revisions: May 2021 January 2026.
Part 2 – Information and Communication Standards • Accessible websites & web content • Accessible feedback process • Accessible formats and communication supports				
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.	• Ensure Summitt Energy website incorporates an on-line feedback process fully accessible in other formats, upon request. • 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. • 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	HR & Marketing Department	May 11, 2016

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		consideration the requestor's disability needs CURRENT PRACTICE Feedback forms are available on our website. HR will provide forms to in-office visitors, clients, or employees upon request.		
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	• 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 • Develop communication strategy for educating Summitt Energy staff on the availability of and process for requesting accessible formats and communication supports CURRENT PRACTICE Not currently in use; however, Summitt Energy has established a framework and will implement accessibility considerations if introduced	HR Department	Ongoing (as required).
	2.2.2 Consult with the person making the request in determining the suitability of an accessible format or communication support.	• 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 CURRENT PRACTICE Not currently in use; however, Summitt Energy has established a framework and will implement accessibility considerations if required.	HR Department	Ongoing (as required).
	2.2.3 Notify the public about the availability of accessible formats and communication supports.	• Incorporate language in marketing materials and website to advise that, in accordance with AODA, accessible format may be made available on request. CURRENT PRACTICE Summitt Energy advises through its website and marketing materials that accessible formats are available upon request, in accordance with AODA.	HR and Compliance Department	Ongoing.

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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.	• Conducted an assessment of current web functionality to ensure compliance and adequacy of accessibility features • Ensure Technology and Content Owners (IT and Marketing) are aware of IASR requirements for existing web content • 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) CURRENT PRACTICE New internet websites and web content on those sites confirm with WCAG 2.0 Level AA.	Marketing & IT Department	May 11, 2016 Updated July 2026 and Ongoing.
Part 3 – Employment Standards • <i>Recruitment, assessment and selection</i> • <i>Accessible formats and communication support for employees</i> • <i>Workplace emergency response</i> • <i>Return to work processes</i> • <i>Performance management, career development and redeployment</i>				
3.1 Recruitment, General	Notify employees and the public about the availability of accommodation for applicants with disabilities in recruitment processes.	• Existing recruitment policies, procedures and processes reviewed & language incorporated on postings and Summitt Energy career section of website to make applicants aware that in accordance with the AODA, accommodation is available CURRENT PRACTICE In place.	HR Department	Established May 2016, reviewed May 2026 and Ongoing.
3.2 Recruitment, Assessment or Selection Process	3.2.1 Review existing recruitment policies, procedures and processes	• Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request CURRENT PRACTICE In place.	HR Department	Effective January 1, 2015 reviewed May 2026 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	• Potential candidates are currently advised to inform Summitt Energy if an accommodation is required for an interview. CURRENT PRACTICE In place.	HR Department	Effective May 11, 2016, reviewed May 2026 and Ongoing.

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3.3 Notice to Successful Applicants	When making an offer of employment, notify the successful applicant of policies for accommodating employees with disabilities	• Incorporate in offer letter a section regarding Summitt Energy's accessibility policies and where to access additional information CURRENT PRACTICE In place.	HR Department	Effective May 11, 2016, reviewed May 2026 and <i>Ongoing</i> .
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.	• Create accommodation procedures • Inform employees of policies to support employees with disabilities CURRENT PRACTICE In place. Latest e-mail sent to all staff members March 2026.	HR Department	<i>Ongoing</i>
	3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	• Accessibility policies and processes to be Incorporated in onboarding process for Ontario. CURRENT PRACTICE In place.	HR Department	Effective December 31, 2014, reviewed July 2026 (<i>Ongoing</i>).
	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.	• Communicate policy changes and/or updates in regards to accommodation with respect to disabilities. CURRENT PRACTICE In place. Latest e-mail sent to all staff members March 2026.	HR Department	Effective December 31, 2014, reviewed July 2026 (<i>Ongoing</i>).
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	• Educate employees on the availability of accessible formats and communication supports in accordance with the AODA • Educate employees on the process for requesting accessible formats and communication supports CURRENT PRACTICE In place. Latest e-mail sent to all staff members March 2026.	HR Department	Email sent to all staff members March 2026 (<i>Ongoing</i>).

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	3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	• Develop a process for consulting with employees to determine accommodation needs • Develop a process for advising employees of solution CURRENT PRACTICE Summitt Energy will consult with the employee making the request in determining the suitability of an accessible format or communication support.	HR Department	Effective May 19, 2021 and Ongoing.
3.6 Workplace Emergency Response Information	3.6.1 Provide individualized workplace emergency response information 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.	• Review Summitt Energy's emergency response processes and adjust if necessary to include AODA's requirements in regard to individualized workplace emergency response. • Determine via email, who requires individualized help during an emergency situation. CURRENT PRACTICE Summitt Energy will provide individualized workplace emergency response information and appropriate support measures when an employee's accommodation needs are identified. With the employee's consent, relevant information may be shared with designated individuals to assist in an emergency.	HR Department	Ongoing (as required)
	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. CURRENT PRACTICE Individualized emergency response information provided, as required.	Departmental Management & HR Department	Same as above.
	3.6.3 Employers shall provide the information required under this section as soon as practicable after the	• Human Resources will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible.	HR Department	Same as above.

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	employer becomes aware of the need for accommodation due to the employee's disability.	CURRENT PRACTICE Individualized emergency response information provided, as required.		
	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; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies	Review information when the employee moves to a different location &/or when employee's accommodation needs or emergency response policies are reviewed. CURRENT PRACTICE Summitt Energy will provide individualized workplace emergency response information and appropriate support measures when an employee's accommodation needs are identified. With the employee's consent, relevant information may be shared with designated individuals to assist in an emergency.	HR Department	Same as above.
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.	- Review current accommodation processes and practices - Document individualized accommodation procedures in accordance with AODA CURRENT PRACTICE Summitt Energy maintains a documented Accommodation Policy and procedure, including Individual Accommodation Plans (IAPs).	HR Department	Effective December 31, 2014, Reviewed in July 2026 & 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	- Documented plans will incorporate the following elements: a) Manner in which employee can request b) Under which circumstances medical is required c) Who (Sunlife & Third Party Benefits Consultant) will be assessing the medical provided - Work with Sunlife & Third Party Benefits Consultant (disability partner) to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests – if required.	HR Department	Reviewed July 2026 & Ongoing (as required).

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	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. 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.	d) Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (Sunlife & Third Party Benefits Consultant) and what information may be shared 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 f) Train Summitt Energy staff and Managers on the Accessibility policies, processes and procedures for requesting individual plans CURRENT PRACTICE Summitt Energy maintains a documented Accommodation Policy and procedure to support accommodation needs when required. Training will be provided to Managers as and when required.		
3.8 Return to Work Process	Develop and have in place a return to work process for Summitt Energy employees who have been absent from work due to a disability and require disability-	• Review the current return to work process • Update and document return to work process based on gaps and compliance requirements	HR Department	Established January 1, 2014, Updated May 19, 2021 and June 2026.

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	related accommodations in order to return to work and document the process	CURRENT PRACTICE A formal Return-to-Work process has been documented by Human Resources.		
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.	• Assess current performance review processes to ensure accessibility features are incorporated (i.e., assessable forms, conversations in plain text). • Ensure updated/new performance management processes incorporate accessibility features • 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 CURRENT PRACTICE Managers will consider individual accommodation needs, where applicable, in fulfilling their responsibilities.	HR Department and Department Managers	Ongoing (as required)
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.	• Review current training and professional development materials to ensure accessibility requirements are implemented • Ensure all future training and materials are created with accessibility requirements in mind • Ensure career promotion criteria, practices and processes take into account individual accommodation needs • Track career progression of individuals with disabilities CURRENT PRACTICE Summitt Energy uses ADP for performance management and career development processes and will review and adapt these tools, as required, to accommodate individual accessibility needs.	HR Department and Department Managers	Established May 2016, Reviewed January 2026, and Ongoing.
3.11 Redeployment	An employer that uses redeployment shall take into account the accessibility needs of its employees with	• Review and update current transfer and redeployment practices and processes to ensure accommodation plans are referenced	HR Department and Department Managers	Ongoing (as required)

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	disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs CURRENT PRACTICE Summitt Energy does not currently have a formal redeployment process; however, accessibility and accommodation needs will be considered should redeployment become necessary.		
Part 4 – Customer Service Requirements <i>Establishment of Policies, Practices and Procedures</i> <i>Use of Service Animals and Support Persons</i> <i>Notice of Temporary Disruptions</i> <i>Feedback Process for Providers of Goods or Services</i> <i>Notice of Availability of Documents</i> <i>Format of Documents</i>				
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 and June 2026.
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)	Service Animals: 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. Support Persons: 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	While Summitt Energy's premises are not open to the general public, the organization will comply with AODA requirements when required.	Ongoing (as required)

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		CURRENT PRACTICE While Summitt Energy's premises are not open to the general public, the organization will comply with AODA requirements when required.		
4.3 Notice of Temporary Disruptions	(1) 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 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). (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). (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). (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	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 length of time, and a description of alternative facilities or services available. The notice will be placed at all public entrances (where applicable), reception counter and on Summitt Energy's website. CURRENT PRACTICE Summitt Energy will provide notice of disruptions impacting its services via its website or other appropriate communication channels, where applicable.	Not currently applicable. Will be reviewed and implemented if required by Marketing and HR department.	May 11, 2021 – websites updated so that notice can be posted. Ongoing (as required).

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	connection with a temporary disruption and, upon request, shall give a copy of the document to any person. O. Reg. 429/07, s. 5 (4).			
<i>4.4 Feedback Process for Providers of Goods or Services</i>	(1) 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). (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). (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).	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; Telephone: 905-366-7000 Email: accessibility@summittenergy.ca Mail: Summitt Energy Attention: Human Resources 100 Milverton Drive, Suite 608 Mississauga, ON L5R 4H1 Feedback forms are available at the website as well. 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. CURRENT PRACTICE Feedback processes are maintained through the company website and are available in accessible formats upon request.	HR and Marketing Department	May 11, 2016, and Ongoing.
<i>4.5 Notice of Availability of Documents</i>	(1) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents required by	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. CURRENT PRACTICE Accessible formats provided, upon request.	HR and Marketing Department	Effective January 1, 2014.

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	this Regulation are available upon request. O. Reg. 429/07, s. 8 (1). (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).			
<i>4.6 Format of Documents</i>	Format of Documents (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). (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).	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. CURRENT PRACTICE 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	HR and Marketing Team	Effective January 1, 2014 Ongoing (as required).