



## BARTON MALOW CANADA MULTI-YEAR ACCESSIBILITY PLAN

**Plan Period:** 2026–2030

**Effective Date:** April 1, 2026

**Next Review Date:** April 1, 2029

**Approved By:** Rob Frasca, Vice President

### 1. Statement of Commitment

Barton Malow Canada Ltd. (BMCL) is committed to treating all people in a way that allows them to maintain their dignity and independence. BMCL believes in integration and equal opportunity and is committed to meeting the accessibility needs of persons with disabilities in a timely manner.

BMCL is committed to identifying, preventing and removing barriers to accessibility and to meeting its obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") and Ontario Regulation 191/11 (Integrated Accessibility Standards Regulation) ("IASR"), as amended, as well as the accessibility requirements under the Ontario *Human Rights Code*.

### 2. Purpose

This Multi-Year Accessibility Plan outlines BMCL's strategy and ongoing actions to prevent and remove barriers and to improve accessibility for persons with disabilities, in accordance with the AODA and the IASR.

This Plan is intended to support BMCL's accessibility policies and related practices across the organization.

### 3. Scope

This Plan applies to BMCL's operations in Ontario and to all employees, applicants, contractors, and members of the public who interact with BMCL's goods, services, facilities, communications, and employment processes, as applicable.

This Plan addresses accessibility requirements applicable to BMCL, including (as relevant to BMCL's operations):

- General Requirements
- Customer Service
- Information and Communications
- Employment

### 4. Availability of the Plan

BMCL will:

- maintain and document this Multi-Year Accessibility Plan;



- post the Plan on its website (if any); and
- provide the Plan in an accessible format upon request.

BMCL will review and update this Plan at least once every five (5) years, and sooner if required to reflect legislative or operational changes.

## **5. Roles and Responsibilities**

### **5.1 Leadership / Management**

BMCL leadership is responsible for:

- supporting accessibility compliance and implementation across departments;
- allocating appropriate resources to accessibility initiatives; and
- promoting an accessible and inclusive workplace and service environment.

### **5.2 Human Resources / People Operations**

Responsible for:

- accessible recruitment, accommodation, return to work and workplace accommodation processes;
- employee accessibility-related communications and training coordination; and
- maintaining related documentation and records.

### **5.3 Managers and Supervisors**

Responsible for:

- applying BMCL accessibility policies and practices in day-to-day operations;
- responding appropriately to accommodation requests;
- supporting individualized accommodation and return-to-work processes; and
- ensuring accessibility considerations are integrated into workplace practices.

### **5.4 Employees and Contractors**

Responsible for:

- participating in required training;
- complying with BMCL accessibility policies and procedures; and
- reporting accessibility barriers or concerns.

## **6. Accessibility Policies and Training (General Requirements)**

BMCL maintains accessibility policies and practices describing how BMCL achieves or will achieve accessibility in accordance with the IASR and related accessibility standards.

BMCL will continue to:

- review and update accessibility-related policies and practices as needed;



- provide training on accessibility standards and the Ontario *Human Rights Code* as it relates to persons with disabilities, appropriate to roles and responsibilities;
- provide training to new employees and others covered by the IASR requirements as soon as practicable; and
- provide updated training when there are changes to BMCL's accessibility policies; and
- maintain records of training, including dates and number of participants, where required.

## 7. Multi-Year Accessibility Initiatives and Action Plan

The following initiatives set out BMCL's accessibility strategy for the plan period. Timelines may be adjusted as needed based on operational requirements, legal changes, and identified priorities.

### 7.1 Customer Service Accessibility

**Objective:** Ensure persons with disabilities can access BMCL's goods, services, and facilities in a manner that respects dignity, independence, integration, and equal opportunity.

**BMCL will:**

- maintain accessible customer service practices and policies;
- support communication with persons with disabilities in ways that take into account their disability;
- permit the use of assistive devices, service animals and support persons, as required by law;
- provide notice of temporary disruptions affecting accessible services or facilities, where applicable; and
- provide and document customer service training for employees and others who interact with the public or third parties on BMCL's behalf.

**Timeline:** Ongoing during the Plan period

**Responsibility:** Facilities Department / Managers / Leadership

### 7.2 Information and Communications

**Objective:** Make information and communications accessible to persons with disabilities, upon request and in accordance with applicable legal requirements.

**BMCL will:**

- provide accessible formats and communication supports for persons with disabilities upon request, in a timely manner, taking into account the person's accessibility needs and at a cost no more than the regular cost charged to others (if any);
- consult with the requesting person, where appropriate, to determine suitability of an accessible format or communication support;



- ensure public emergency procedures, plans or public safety information made publicly available by BMCL are provided in an accessible format or with appropriate communication supports, upon request;
- maintain an accessible feedback process and make information about the process available in accessible formats upon request; and
- continue to review BMCL's website and web content for accessibility requirements applicable to BMCL under the IASR (including WCAG conformance requirements, as applicable to BMCL).

**Timeline:** Ongoing; website reviews annually

**Responsibility:** Marketing & Communications

### **7.3 Employment Accessibility**

**Objective:** Maintain accessible employment practices across the employment lifecycle and support accommodation in the workplace.

#### **Recruitment, Assessment and Selection**

BMCL will:

- notify employees and the public that accommodations are available for applicants with disabilities in BMCL's recruitment processes;
- notify job applicants selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used;
- consult with applicants who request accommodation and provide or arrange for suitable accommodation, where required; and
- notify successful applicants of BMCL's policies for accommodating employees with disabilities.

#### **Informing Employees of Supports**

BMCL will:

- inform employees of BMCL's policies used to support employees with disabilities, including policies on job accommodations that take into account an employee's accessibility needs due to disability;
- provide updated information to employees whenever there is a change to those policies.

#### **Accessible Formats and Communication Supports for Employees**

BMCL will:

- where an employee with a disability requests it, consult with the employee to provide or arrange for accessible formats and communication supports for:
  - information needed to perform the employee's job; and
  - information generally available to employees in the workplace.



### **Workplace Emergency Response Information**

BMCL will:

- provide individualized workplace emergency response information to employees with disabilities, where necessary and where BMCL is aware of the need for accommodation due to disability;
- with the employee's consent, provide the information to a person designated to assist the employee;
- review the information when the employee moves to a different location, when accommodation needs or plans are reviewed, and when BMCL reviews its general emergency response policies.

### **Documented Individual Accommodation Plans**

BMCL will:

- maintain a written process for developing and documenting individual accommodation plans for employees with disabilities, as required by the IASR;
- ensure the process includes participation of the employee, assessment of individual needs, and review/update mechanisms.

### **Return to Work Process**

BMCL will:

- maintain a documented return to work process for employees absent due to disability who require disability-related accommodations to return to work;
- outline the steps BMCL will take to facilitate return to work and use documented individual accommodation plans where appropriate.

### **Performance Management, Career Development, Advancement and Redeployment**

BMCL will:

- take into account the accessibility needs of employees with disabilities, and individual accommodation plans, when using performance management processes, providing career development and advancement opportunities, and considering redeployment.

**Timeline:** Ongoing during the Plan period

**Responsibility:** Human Resources / Managers / Leadership

## **8. Reporting, Monitoring and Review**

BMCL will monitor progress on the initiatives set out in this Plan and update internal stakeholders as appropriate.

BMCL will review and update this Multi-Year Accessibility Plan at least once every five (5) years, or sooner if needed due to legislative changes, organizational changes, or identified accessibility priorities.

## **9. Feedback and Requests for Accessible Formats**

BMCL welcomes feedback on accessibility and on this Multi-Year Accessibility Plan.



Requests for accessible formats, communication supports, or accessibility feedback may be directed to:

**Email:** [HRCanada@bartonmalow.com](mailto:HRCanada@bartonmalow.com)

**Phone:** 519-740-1090

**In writing to:**

Barton Malow Canada Ltd.

560 Sheldon Drive,

Cambridge, ON

N1T 0A4

BMCL will respond to requests in a timely manner and in accordance with applicable accessibility requirements.