

**INTRODUCTION:**

In 2005, the Ontario Government passed the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”), which requires that Ontario be an accessible province by 2025. It has introduced a phased-in approach to the implementation of its requirements through regulations under AODA. To help public, private and not-for profit organizations identify, prevent and remove barriers to accessibility, AODA sets out specific accessibility standards in four areas; information and communications, employment, transportation, and the design of public spaces.

**COMMITMENT OF ARNON:**

Arnon Development Corporation Limited (“**ARNON**”) is committed to ensuring that all people with disabilities are treated in a manner that respects their dignity.

**MULTI-YEAR ACCESSIBILITY PLAN:**

Under AODA, ARNON is required to establish a Multi-Year Accessibility Plan (the “Plan”). This Plan outlines ARNON’s strategy to ensure compliance with its current and future obligations under AODA and its corresponding regulations.

This Plan builds on past planning and consultation. ARNON is committed to continue building on and developing operational polices and guidelines for employees as outlined in this Plan. It is a living document that outlines ARNON’s goals and objectives.

This Plan will be posted on the website of ARNON’s affiliate company, Arnon Corporation (“**AC**”), because ARNON does not have a website. External parties will be directed to the AC website should they wish to access the Plan online, which will be made available to staff and members of the public in an accessible format upon request and will be reviewed and updated at least once every five years.

Set out below are the details of how ARNON intends on fulfilling its obligations under AODA over the coming years.

**MULTI-YEAR ACCESSIBILITY PLAN:**

**Part I – General Requirements**

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3(1) 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.	ARNON is dedicated to the development, implementation and maintenance of policies governing its commitment to the requirements under the accessibility standards, in a timely manner.	Reviewed – revisions have been completed.	January 1, 2014
4	Accessibility Plans	<p>4(1) Large organizations shall,</p> <p>(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;</p> <p>(b) Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>(c) Review and update the accessibility plan at least once every five years.</p>	<p>Plan has been reviewed</p> <p>Plan is posted on on the website of ARNON’s affiliate company, AC.</p> <p>Check for updates on the website of the Ministry of Economic Development, Employment and Infrastructure at least once every six months.</p>	<p>Reviewed – revisions have been completed.</p> <p>Plan has been approved.</p> <p>Revisions based on changes or compliance date.</p>	<p>January 1, 2014</p> <p>Review/update: January 1, 2019</p>
6	Self-Serve Kiosks	6(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	ARNON has an interactive tenant directory located at its building at 180 Elgin Street and a pay and display machine in the parking lot of that building.	Complete	January 1, 2014

7	Training	<p>7(1) Every obligated organization shall ensure that training is provided on the requirements of accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,</p> <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organizations policies; and</li> <li>(c) all other persons who provide goods, services or facilities on behalf of the organization.</li> </ul> <p>7(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>7(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 (REG 191/11) on an ongoing basis.</p> <p>7(5) Every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it provided.</p>	<p>ARNON will continue to provide ongoing training about the requirements.</p> <p><i>Note: the transportation standard does not apply to ARNON practices.</i></p> <p>Training will be provided when a new employee starts, during annual reviews or when the policy or legislation changes.</p> <p>Records of training will be kept with the Health &amp; Safety training files as well as noted on the training spreadsheet.</p>	<p>Customer service is part of training.</p> <p>Update of training to include required topics such as the <i>Human Rights Code</i>. Will be part of new worker orientation as well as annual Health &amp; Safety reviews.</p>	January 1, 2015
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**Part II - Information & Communications Standard**

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	<p>11(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports, upon request.</p> <p>11(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Where possible, ARNON will strive to ensure that its processes for receiving feedback are accessible for people with disabilities by providing accessible formats or communication support upon request.</p> <p>Whenever possible, responses to feedback will be provided in the same format as the format in which the request was made (in person, by telephone, by written letter or e-mail via AC's website).</p> <p>A feedback form (as per ARNON's Accessibility Standard for Customer Service) is available upon request.</p>	<p>Feedback form for Customer Service available upon request.</p> <p>Accessibility contact is on the AC website.</p>	January 1, 2015

Section	Initiative	Description	Action	Status	Compliance Date
12	Accessible Formats & Communication Supports	<p>12(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p> <p>12(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>12(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>ARNON will, upon request, consult with persons with disabilities to determine if accessible formats and communication supports may be provided in a timely manner that are suitable and take into account individuals' accessibility needs due to disability, where reasonable and practicable given the circumstances and at a cost that is no more than the regular cost charged to other persons.</p> <p>ARNON will consult with the person making a request for suitable accessible formats or communication supports.</p> <p>This is communicated to the public through AC's website.</p>	<p>On-going</p> <p>Complete</p>	<p>January 1, 2016</p>
13	Emergency Procedures, Plans or Public Safety Info	<p>13(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p>	<p>Where possible, ARNON will continue to, upon request, provide emergency document(s) that it shares with the public or clients in an accessible format. This applies to head office only, as tenants are required to prepare their own individual evacuation/emergency procedures based on their employees' needs.</p> <p>Emergency procedures are posted in conspicuous locations.</p>	<p>Complete</p>	<p>January 1, 2012</p>

Section	Initiative	Description	Action	Status	Compliance Date
14	Accessible Websites & Web Content	14(2) Designated public sector organizations and large organizations shall make their internet websites 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.	<p>AC currently meets, and will continue to meet, the Web Contents Accessibility Guidelines (“WCAG”) 2.0 at Level A in regards to its website and web content.</p> <p>AC will conform with WCAG 2.0, Level AA, in regards to its website and web content.</p>	<p>Compliant to Level A</p> <p>To be reviewed no later than 2020 or during major changes to the website.</p>	<p>January 1, 2014</p> <p>January 1, 2021</p>

**Part III – Employment Standard**

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	ARNON will, in its recruitment processes, notify employees and the public that certain accommodations are available upon request.	Compliant	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
23	Recruitment, Assessment or Selection Process	<p>23 (1) During a recruitment process, an employer shall notify job applicants, when they are individually 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.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>	<p>ARNON will notify job applicants who are selected to participate in an assessment or selection process that certain accommodations are available upon request.</p> <p>Applicants requesting an accommodation shall be consulted in order to determine if accommodations may be provided that are suitable and take into account the applicant's accessibility needs, where reasonable and practicable given the circumstances.</p> <p>Continue to identify barriers that exist.</p>	Compliant	January 1, 2016
24	Notice to Successful Applicants	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<p>ARNON will continue to notify successful applicants of its policies for accommodating employees with disabilities.</p>	Compliant	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
25	Informing Employees of Supports	<p>25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>(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.</p>	<p>ARNON will inform current and new employees of its policies that provide certain accommodations and support to employees with disabilities.</p> <p>The required information is provided to new employees during orientation.</p> <p>ARNON provides updated information to its employees when there is a change to existing policies through training sessions, postings, emails, memos or by any other means it deems necessary and appropriate given the circumstances.</p>	Compliant	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
26	Accessible Formats & Communication Supports for Employees	<p>26.(1) In addition to its obligations under section 12, 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,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p> <p>(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>When requested, ARNON will strive to provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the person's accessibility needs.</p> <p>The employee submitting the request will be consulted during the process to evaluate suitability.</p>	Compliant	January 1, 2016
27	Workplace Emergency Response Information	<p>27.(1) Every employer shall 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.</p> <p>(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.</p>	<p>ARNON will create, and strive to provide as soon as possible, emergency response information for any employee who discloses he/she requires an accommodation.</p> <p>If an employee has an individual accommodation plan, then the individualized workplace emergency response information provided to the employee will be included in the plan.</p>	<p>Compliant</p> <p>No requests submitted to date</p> <p>See above</p>	January 1, 2012

Section	Initiative	Description	Action	Status	Compliance Date
27 (cont.)	Workplace Emergency Response Information (cont.)	<p>(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.</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>See above</p> <p>ARNON will review individualized emergency response information when an employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed or when ARNON reviews its general emergency response policies.</p>	<p>See above</p> <p>See above</p>	
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	ARNON has in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Complete	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
28 (cont.)	Documented Individual Accommodation Plans (cont.)	<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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 and how accommodation can be achieved.</li> <li>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.</li> <li>5. The steps taken to protect the privacy of the employee's personal information.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> </ol>	<p>ARNON will, where reasonable and practicable given the circumstances, maintain a written process for the development of documented individual accommodation plans for employees with disabilities that includes the required elements. If requested, information regarding accessible formats and communication supports provided will also be included in individual accommodation plans.</p> <p>The plans will include individualized workplace emergency response information, where required, and will identify any other accommodation that is to be provided.</p>		

Section	Initiative	Description	Action	Status	Compliance Date
28 (cont.)	Documented Individual Accommodation Plans (cont.)	<p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>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>			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p> <p>(2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	<p>ARNON has in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.</p> <p>The return to work process will outline the steps ARNON will take to facilitate the return to work of employees who were absent from work because of their disability. The return to work process will also incorporate the individualized accommodation plan of the employee.</p>	Compliant	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
29 (cont.)	Return to Work Process (cont.)	(3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.			
30	Performance Management	30.(1) 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.	ARNON will continue to 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.	On-going	January 1, 2016
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	ARNON will continue to take into account the accessibility needs of employees with disabilities, as well as their individual accommodation plans when providing career development and advancement to employees.	On-going	January 1, 2016
32	Redeployment	32.(1) 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 employees with disabilities.	ARNON takes into account the accessibility needs of employees with disabilities and their individual accommodation plans when redeploying employees.	On-going	January 1, 2016