

Integrated Accessibility Standards Policy

The following is a copy of the Integrated Accessibility Standards Policy that is in effect for our operating companies, namely, North American Development Group & Related Companies. A copy of the policy may be requested by contacting the Company at hr@nadg.com, or by phone at 905-477-9200.

Commitment to Persons with Disabilities

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity and are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act (2005)*.

The Company has developed and made available upon request, this policy and a multi-year accessibility plan which outlines the actions we will put in place to improve opportunities for people with disabilities.

Please refer to the multi-year plan for details about the Company will address the following:

Information and Communication Standard:

- Accessible Emergency Information
- Feedback from Customers and Co-workers¹
- Accessible Formats and Communication Supports
- Emergency Procedures/Plan or Public Safety Information
- Accessible Websites & Web Content
- Self-Serve Kiosks

Employment Standard

- Recruitment, assessment and selection
- Accessible formats and communication supports for Co-workers
- Workplace emergency response information
- Documented Individual accommodation plans
- Return to work process
- Performance Management
- Career Development and Advancement
- Redeployment

Training

The Company will provide training to Co-workers and volunteers on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the Co-workers, volunteers and others who represent the organization. Training will include but is not limited to, the Integrated Standard and the Ontario Human Rights Code as it pertains to persons with disabilities.

The Company will take the following steps to ensure Co-workers and volunteers are provided with the training needed to meet Ontario's accessibility laws. The Company will utilize the video program created and hosted by the Ontario Human Rights Commission, *Working Together: The Code and the AODA*. The program includes sections on:

¹ The term 'Co-Worker' as referred to in this policy means 'employee' as such term is defined in relevant legislation.

- The Code
- understanding the duty to accommodate
- applying human rights principles
- compliance and enforcement

The videos can be found at: <http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda>

In addition, Company policy and multi-year plan will be reviewed during the training session. Training records will be kept as a record of who has been trained and when they were trained.

For more information on this policy or the multi-year accessibility plan, please contact the HR Vice President via email at hr@nadq.com or via phone 905-477-9200.

Accessible forms of this document and the accessibility plan are available upon request.