

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 Multi-Year Accessibility Plan

Updated: October 2025

| Initiative   | Implemented   | Status    | Compliance                    |
|--|---|-----------|-------------------------------|
| ection 3: Establishment of Accessibility Policies  |   |           |                               |
| (1) Every obligated organization shall develop, implement and maintain policies governing how the organization chieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in his Regulation.   | (1) thru (3) Implemented the following policy:  |           |                               |
| 2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to neet the accessibility needs of persons with disabilities in a timely manner in their policies.  | Published updated PAD106 - Accessibility for Ontarians with Disabilities Act (AODA) Policy - Updated Issued April 11, 2025                                    | Completed | Initial Compliance<br>Q1-2011 |
| 3) The Government of Ontario, the Legislative Assembly, every designated public sector organization and large rganizations shall, ) prepare one or more written documents describing its policies; and ) make the documents publicly available, and shall provide them in an accessible format upon request. | NBHDL Website revised Accessibility page was updated on July 4, 2025, includes Accessible Customer Feedback guidance, Statement of organizational commitments | Completed | Q3-2025                       |
| Section 7: Training (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility   |   |           |                               |
| tandards 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.  | (1) thru (5) As part of our onboarding process, our employees complete the following training;  |           |                               |
| 2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in   |   |           |                               |
| ubsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.   | <ul><li> Understanding Human Rights Training (AODA)</li><li> AODA Customer Service Standards Training</li></ul>   |           |                               |
| 3) Every person referred to in subsection (1) shall be trained as soon as practicable.   | (Comprehensive Content) • Information and Communications Standards and  | Completed | Q4-2011                       |
| 4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on in ongoing basis.   | Employment Standards  |           |                               |
| 5) The Government of Ontario, the Legislative Assembly, every designated public sector organization and every large  | All training is documented and retained   |           |                               |

| Part 2 — Information and Communications Standard  |  |             |                                |
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| Section 11: Feedback  |  |             |                                |
| 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 communications supports, upon request.  | (1),(2) Initial Policy: Accessibility Policy - Customer Service addressing Customer Feedback   |             | Initial Compliance:<br>Q4-2011 |
| (2) Nothing in this section detracts from the obligations imposed under section 7 of Ontario Regulation 429/07 (Accessibility Standards for Customer Service) made under the Act.   | NBHDL Website updated the Accessibility page on July 4, 2025 includes multiple feedback methods available including hard copy, website, email, phone and in-person | Completed   | Q3-2025                        |
|   | If another method is requested, Customer Service will provide other options upon request   |             |                                |
| Section 12: Accessible Formats and Communication Supports   |  |             |                                |
| 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, in a timely manner that takes into account the person's accessibility needs due to disability; and at a cost that is no more than the regular cost charged to other persons. | (1) Our website will include a message about the availability of accessible formats and communication supports upon request  |             |                                |
| (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.  | Supports in place to be able to provide communication in the following formats: written, oral, face to face, over the phone, email                                 | Completed   | Q3-2025                        |
| (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.   | (2) Each request received will be reviewed and through consultation with the individual, determine an acceptable, suitable, accessible format                      | 30p.10.10.1 | ζο 2020                        |
|   | (3) A website statement that all information is available in other formats   |             |                                |
|   | Policy/Procedure: Development of Accommodation Policy  | In Progress | Q4 -2025                       |

| Part 2 — Information and Communications Standard Initiative  | Implemented  | Status      | Compliance                            |
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| Section 13: Emergency Procedures, Plans or Public Safety Information 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.  (2) Obligated organizations that prepare emergency procedures, plans or public safety information and make the information available to the public shall meet the requirements of this section by January 1, 2012. | (1),(2) NBHDL posts a notice at the physical location of any planned temporary disruptions of service, posts n out website any planed or actual disruptions and/or advertises with local media as appropriate, to notify Customers.  Additionally, NBHDL Website provides a "Notice of Temporary Service Disruption" in accordance with Section 13(1), noting that while our Service Outage Map is available, it may have limited accessibility and will include an appropriate exception disclaimer.  "The Service Outage Map may have limited accessibility. We're working to meet AODA standards. For accessible outage info or communication support, contact us at 705-474-8100." | Completed   | Q4-2012  Disclaimer completed Q3-2025 |
|  | NBHDL will ensure the next iteration of the Service Outage<br>Map on our Website is AODA compliant   | In Progress | Q4-2026                               |

| Part 3 — Employment Standard   |   | 01.1        |            |
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| Initiative   | Implemented   | Status      | Compliance |
| Section 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.   | Included on all NBHDL Job Postings and advertisements contain: "North Bay Hydro Distribution Limited is an equal opportunity employer and provides accommodation in accordance with applicable laws throughout the hiring process." | Completed   | Q4-2011    |
|  | Policy/Procedure: Development of Accommodation & Recruitment Standard Operating Procedure   | In Progress | Q4-2025    |
| Section 23: Recruitment, Assessment Or Selection Process   |   |             |            |
| 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. | (1),(2) At every point in the recruitment process including interviews, testing, etc., the applicant will be offered accommodation  | In Progress | Q4 - 2025  |
| (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.         | Policy/Procedure: Development of Accommodation & Recruitment Standard Operating Procedure   | In Progress | Q4-2025    |
| Section 24: Notice to Successful Applicants  |   |             |            |
| 24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for<br>accommodating employees with disabilities.  | Every applicant selected for a position will be notified that we are AODA compliant and asked to advise us of any accommodations required. Terminology has been added to the orientation checklist                                  | Completed   | Q4-2011    |
|  | Policy/Procedure: Development of Accommodation Policy, with related Recruitment Standard Operating Procedure  | In Progress | Q4-2025    |
| Section 25: Informing Employees of Supports  |   |             |            |
| 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. | (1) thru (3) Currently into Practice. Policy/Procedure: Development of Accommodation Policy   | In Progress | Q4-2025    |
| (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.   | When a change is made to any policy and/or procedure employees receive training and sign off  | Completed   | Q4-2011    |
| (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.  | Accessibility Standards Training for all staff as part of our onboarding process - 2011 & ongoing   | ·           | -          |

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| ection 26: Accessible Formats and Communication Supports For Employees   |  |   |  |
| 6.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer nall consult with the employee to provide or arrange for the provision of accessible formats and communication apports for,  | (1), (2) Currently into Practice. Policy/Procedure: Development of Accommodation Policy  |   |  |
| information that is needed in order to perform the employee's job; and information that is generally available to employees in the workplace. O. Reg. 191/11, s. 26 (1).   | Will provide or arrange to provide accessible formats and communication supports to employees who request it   |   |  |
| 2) The employer shall consult with the employee making the request in determining the suitability of an accessible ormat or communication support.   | Will consult with any employee making a request and develop a plan to determine a suitable format or communication support   | In Progress   | Q4-2025  |
| ection 27: Workplace Emergency Response Information  |  |   |  |
| 7.(1) Every employer shall provide individualized workplace emergency response information to employees who have a isability, if the disability is such that the individualized information is necessary and the employer is aware of the need or accommodation due to the employee's disability.            |  |   |  |
|  | (1) thru (4)   |   |  |
| 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 esignated by the employer to provide assistance to the employee.           | Policy/Procedure: NBHDL has an Emergency Egress and Evacuation Procedure established in 2011.  |   |  |
|  | NBHDL will review this policy and incorporate the following  |   |  |
| B) Employers shall provide the information required under this section as soon as practicable after the employer ecomes aware of the need for accommodation due to the employee's disability.  | AODA aspects;  | In Progress –<br>General  |  |
| Every employer shall review the individualized workplace emergency response information, when the employee moves to a different location in the organization; when the employee's overall accommodations needs or plans are reviewed; and when the employer reviews its general emergency response policies. | <ul> <li>Facilitates the development of an individual emergency plan that considers various emergency situations when we are made aware of a disability</li> <li>Emergency response information will be given to the person designated to assist, with the employee's consent</li> <li>Employee information will be kept confidential</li> <li>Individual response information will be provided in a timely manner, from the time that the NBHDL is made aware of the disability.</li> <li>Individual emergency plans will be reviewed as noted in 27 (4)</li> </ul> | emergency<br>procedures in<br>place;<br>individualized<br>plans to be<br>developed as<br>needed | Q4-2026<br>or sooner based<br>individual<br>requirements |

| Part 3 – Employment Standard   |   |             |            |
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| Section 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.  (2) The process for the development of documented individual accommodation plans shall include the following elements:  - The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.  - The means by which the employee is assessed on an individual basis.  - 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.  - 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.  - The steps taken to protect the privacy of the employee's personal information.  - The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.  - If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.  - The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.  (3) Individual accommodation plans shall,  - if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;  - if required, include individualized workplace emergency response information, as described in section 27; and - identify any other accommodation that is to be provided. | (1) thru (3) Policy/Procedure: Development of Accommodation Policy Development of Accommodation Plan Form | In Progress | Q4-2025    |

| Part 3 – Employment Standard   |  |   |   |
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| Section 29: Return to Work Process 29.(1) Every employer, other than an employer that is a small organization, - 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 - shall document the process.  (2) The return to work process shall, - 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 - use individual documented accommodation plans, as described in section 28, as part of the process.  (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.           | (1) thru (3) Policy/Procedure: NBHDL has a Return to Work Procedure established in 2011, which considers disability-related accommodations  NBHDL will review this policy for potential AODA updates                 | In Progress —<br>General Return to<br>Work in place;<br>individualized<br>plans to be<br>developed as<br>needed | Q4-2025<br>or sooner based on<br>individual<br>requirements |
| Section 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.  (2) In this section, "performance management "means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.  | (1),(2) Policy/Procedure: Development of Accommodation Policy NBHDL will review current performance management processes "Any individual accommodation plan is considered during the performance management process" | In Progress   | Q4-2025   |
| Section 31: Career Development and 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.  (2) In this section, "career development and advancement "includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them. | (1),(2) Policy/Procedure: Development of Accommodation Policy  | In Progress   | Q4-2025   |
| Section 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.  (2) In this section, "redeployment" means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.  | (1),(2) Policy/Procedure: Development of Accommodation Policy  | In Progress   | Q4-2025   |