



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, AODA

AODA Multi-year Plan

ADMILL GROUP

HUMAN RESOURCE DEPARTMENT
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Accessibility for Ontarians with Disabilities Act

Statement of Commitment Integrated
Accessibility Standards Regulation
and
Multi-year Accessibility Plan

December 2024

This plan is available on Admill Group website at:

www.admillgroup.com/home/accessibility

[Website Accessibility policy](#)

Alternative formats of this document are available upon request.

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AODA Policy and Multi-year Accessibility Plan

eff. December 2024

Policy

Admill Group is committed to compliance requirements with all of the standards under the **Accessibility for Ontarians with Disabilities Act (AODA)**, in accordance with guiding legislation.

Admill Group is dedicated to complying with all standards under the Accessibility for Ontarians with Disabilities Act (AODA). The Company recognizes the importance of implementing accessibility standards promptly to support Ontarians with disabilities.

Admill Group is committed to the principles of independence, dignity, integration, and equality of opportunity, ensuring the needs of people with disabilities are met through this policy.

The Company will maintain and implement policies in accordance with the Integrated Accessibility Standards Regulation (IASR), focusing on customer service, information, communications, employment, and public space design to meet accessibility needs in a timely manner.

The Company will establish and maintain a multi-year accessibility plan to outline strategies for removing barriers and meeting IASR requirements. This plan will specify how the Company will implement IASR requirements within the legislated timelines.

When communicating with individuals with disabilities, Admill Group will provide information in a manner that accommodates their disability. This policy ensures accessibility remains a priority in decision-making, helping to prevent decisions that may unintentionally create barriers.

Scope

This policy applies to Admill Group. and the following:

- Employees
- Contractors
- Visitors
- Applicants for employment may require employment accommodation through the recruitment, assessment, selection and hiring process.

Responsibility

The management team, including immediate supervisors and department heads, is accountable for ensuring that all employees and contractors (where applicable) comply with the guidelines outlined in this policy.

They are also responsible for ensuring that all employees and contractors (where applicable) receive training on the Accessibility Standards and Regulations under the AODA, the Human Rights Code, and all related policies, practices, and procedures.

All employees, contractors, and any individuals acting on behalf of Admill Group are required to adhere to and uphold the commitments set forth in this policy.

Definitions

“Accessibility” refers to providing individuals of all abilities with the opportunity to fully engage in everyday activities. It describes how accessible a service, product, device, or environment is to as many people as possible. Accessibility can be understood as the capacity to access and benefit from a system, service, product, or environment.

“Accessible” formats may include, but are not limited to, large print, recorded audio, electronic formats, Braille, and other formats that can be used by people with disabilities.

“Accommodation” refers to the special arrangements or assistance provided to ensure that people with disabilities can take part in experiences that are available to those without disabilities.

“Barriers” are obstacles that limit access and hinder people with disabilities from fully engaging in society. Most barriers are unintentional and typically arise when the needs of people with disabilities are not considered from the outset.

“Communications” refers to the exchange of information between two or more people or entities, or any combination thereof, when information is provided, sent, or received.

“Communication” supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and any other tools that aid effective communication.

“Dignity” means providing services in a manner that allows individuals to maintain both their own self-respect and the respect of others.

“Equal” opportunity means providing service to individuals in a way that ensures they have the same chance to access goods and services as others.

“Independence” refers to a person's ability to perform tasks on their own, without unnecessary assistance or interference from others.

“**Information**” encompasses data, facts, and knowledge in any form, including text, audio, digital formats, or images, that conveys meaning.

“**Integration**” means providing service in a way that allows individuals to benefit from equivalent services in the same location and in a similar manner as others, unless a different approach is needed to help the individual access goods services.

“**Reasonable efforts**” means adopting approaches that fulfill the specific needs of the individual.



Accessibility for Ontarians with Disabilities Act (AODA)

Introduction & Statement of Commitment

Under the Integrated Accessibility Standards Regulation (IASR) of the Accessibility for Ontarians with Disabilities Act (AODA), Admill Group is required to develop a multi-year plan to prevent and eliminate barriers for individuals with disabilities.

The Company is committed to identifying, preventing, and removing barriers for people with disabilities. Through its multi-year accessibility plan, Admill Group aims to become barrier-free by 2025. This plan includes compliance with the following accessibility standards relevant to our organization:

- Customer Service
- Information and Communications
- Employment
- Design of Public Spaces

Admill Group accessibility plan aligns with the planning requirements under the IASR, enacted on July 1, 2011, under the AODA. The AODA mandates that the Company develop, implement, and enforce accessibility standards to ensure goods, services, facilities, accommodations, employment, buildings, structures, and premises are accessible to individuals with disabilities.

The multi-year accessibility plan outlines the specific actions Admill Group will take to enhance opportunities for persons with disabilities and comply with the phased-in requirements of the Regulation. Developed by the Human Resources Department in consultation with various stakeholders and in accordance with the IASR, this plan addresses both current and future accessibility needs. It will be available in alternative formats upon request.

In accordance with the AODA requirements, the Company will:

- Review and update the plan at least every five years.
- Report progress on the implementation of the plan on its website.
- Provide all information related to the plan in alternative formats upon request.
- The Company will conduct an annual review of the plan's implementation status to ensure continued progress in removing and preventing barriers, ultimately achieving full accessibility under the AODA.

Emergency Response and Evacuation Plan Information

Admill Group incorporates accessibility considerations into its emergency response and evacuation plan and procedures for employees and the public.

Completed Actions:

- Individualized workplace emergency response information is available to employees who have disclosed a disability, and such employees will be accommodated according to their disability when and if an emergency or disaster occurs.
- These individualized plans will be communicated to their managers and recorded in their personnel files.
- Employees have been trained in the emergency response plan and/or public safety information and instructions to ensure that they know how to interact with persons with disabilities during an emergency, incident, or dangerous situation.
- Instructions were provided to staff regarding evacuation in times of emergency to gather at locations that are accessible.
- Persons with various disabilities were consulted to ensure that we met the needs of all persons with disabilities in our emergency response plan, and that public safety information and instructions are provided in a timely manner if an emergency or disaster occurs.
- The emergency response plan and public safety information for employees is posted on the health and safety board on site.

Planned Actions:

- The Company will regularly review our current workplace emergency response and evacuation plan and procedures and post information regarding our procedures in public areas.
- Fire and disaster wardens will be instructed to identify persons in need of assistance in advance of an emergency to discuss the location of the designated waiting areas on how identified persons will be safely evacuated in the event of an emergency.
- Individualized emergency response information will be reviewed when:
 - a) An employee moves to a different location in the organization
 - b) An employee's overall needs or plans are reviewed; and
 - c) When reviewing general emergency response policies
- The emergency response plan and public safety information will be made available in an accessible format or with appropriate communication support upon request.

- The Company’s Emergency Response Plan will be reviewed regarding ongoing pandemics and will be based on learnings from the Covid-19 pandemic.
- A third review will be conducted in early 2025 and an updated version of the Emergency Response Plan to be circulated.

Required legislative compliance: January 1, 2012

Status: Implemented/addressed on an individual basis as need arises



Integrated Accessibility Standard Regulation (IASR) General Requirements

Admill Group is committed to eliminating barriers and enhancing accessibility through the implementation of this policy and associated procedures.

Completed Actions:

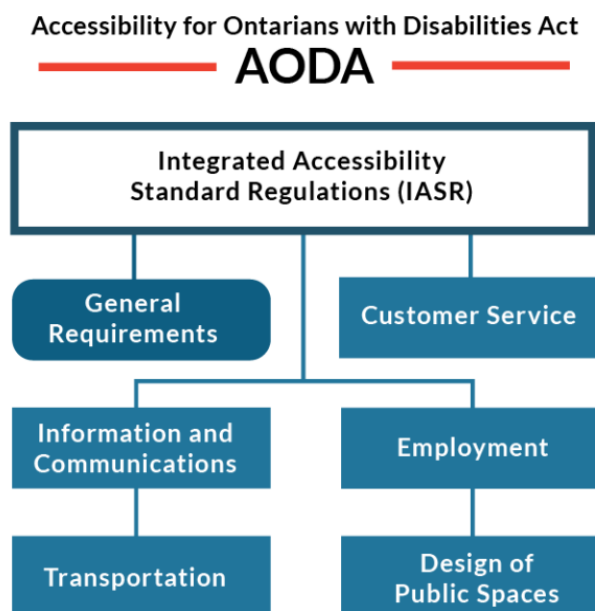
- Developed a policy outlining how the Company meets the requirements of the Integrated Accessibility Standards Regulation (IASR) and achieves accessibility.
- The IASR policy and statement of commitment are available in an accessible format upon request. A Company representative will consult with the individual to determine the appropriate format.
- Updated the AODA Policy to reflect changes to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act (AODA), effective July 1, 2016.
- Reviewed and updated the AODA Policy in December 2024.

Planned Actions:

- Regularly review and update the policy and statement of commitment as necessary.
- Make the IASR policy and statement of commitment available to the public, both on-site and on the Company's website.

Required Legislative Compliance: January 1, 2014

Status: Implemented/Ongoing



Multi-year Accessibility Plan

Admill Group's multi-year accessibility plan outlines the specific actions we are taking to prevent and eliminate barriers while ensuring compliance with both current and future requirements of the Accessibility for Ontarians with Disabilities Act (AODA).

Completed Actions:

- Developed, implemented, and documented the Company's multi-year accessibility plan.
- Posted the accessibility plan on the Company website and made it available in an accessible format upon request.
- Updated the plan to reflect amendments to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act (AODA), effective July 1, 2016.
- Regularly reviewed and updated the multi-year accessibility plan, in accordance with regulatory requirements, at least once every five years.

Planned Actions:

- Continue to maintain and support the multi-year accessibility plan.
- Conduct regular reviews and updates to the plan at least once every five years.

Required Legislative Compliance: January 1, 2014

Status: Implemented/Updated/Ongoing



Training

Admill Group is committed to providing comprehensive training on the requirements of the Accessibility for Ontarians with Disabilities Act (AODA), 2005, including the Integrated Accessibility Standards Regulation, the Accessibility Standards for Customer Service, and the Human Rights Code as it relates to individuals with disabilities. This training is provided to all employees, contractors, and others acting on behalf of the Company, as well as those involved in developing organizational policies.

Completed Actions:

- The Company provides mandatory training on the AODA, Integrated Accessibility Standards, and the Human Rights Code through the Human Resources department.
- Records of training, including dates and the number of individuals trained, are maintained.
- Training on accessibility requirements is provided to new employees promptly after they begin their roles.

Planned Actions:

- Maintain training records and update them with information on new trainees.
- Provide ongoing training on any policy changes as they arise.
- Update training materials to reflect amendments to the Customer Service Standard under the AODA, effective July 1, 2016.
- Inform employees of changes to the AODA that came into effect on July 1, 2016.
- Provide refresher training to employees in March 2025.

Required Legislative Compliance: January 1, 2015

Status: Implemented/Ongoing



Customer Service Standard

Admill Group has developed policies to comply with the Customer Service Standard Regulation and will continue to comply and implement the requirements under this standard.

Completed Actions:

- Established policies, procedures, and practices for providing goods and services to persons with disabilities and posted these in a conspicuous area and on the Company's website.
- Provided accessibility awareness, AODA and customer service standard training to all employees and contractors, and to those who are involved in the creation and implementation of policies, practices, and procedures.
- Worked with people in charge of facilities to develop a notification service disruption protocol.
- Added an "Accessibility" button to the Company's website to communicate the customer service policy and provide instructions for enhanced accessibility offerings.
- Created a customer service policy that highlights information about accessibility requirements under the AODA including policies, guidelines and mandatory and recommended training requirements for staff and management.
- Technological enhancements were added to our information and communication and websites, for the purpose of improving interaction and communication with persons with disabilities.
- Reported compliance on the Customer Service Standard on the Accessibility Compliance Reporting tool at Service Ontario's One-Source for Business website.

Planned Actions:

- The Company has developed and will retain a record of attendance for accessibility training courses.
- Continue to provide reasonable accommodation to customers on a case-by-case basis and a yearly review of the types of accommodation requests we receive will determine how we can improve accessibility.
- Continue to assess premises and other areas where barriers may exist that prevent access to our goods and services.
- Continue to provide an appropriate accessible way of finding signage and instruction to visitors.

- Continue to encourage staff to consider accessibility during planning meetings and events with employees, contractors, customers, including vendors and suppliers.
- Remind the persons responsible of the building-specific service disruption notification protocols.
- Consider accessibility-related feedback received through all channels (i.e. online feedback form, correspondence, inquiries, meeting evaluations, etc.) by assessing and responding to feedback, as required.
- Regularly review the effectiveness of policy, procedures and practices and make necessary adjustments.
- Continue to highlight Customer Service Policy in education, training, and activities.
- New staff and those who have not yet received training will be provided AODA training as soon as it is feasible.
- Updated training will be provided when there are changes to the accessibility policies.
- Continue to track and report on training compliance.

Required legislative compliance: January 1, 2012

Status: Implemented/ongoing



Information and Communications Standard

Admill Group will incorporate accessibility requirements under the information and communications standard to ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of persons with disabilities. The Company will provide necessary communication support in a timely manner.

Accessible Websites

Admill Group's main website and sub-sites, including web content, will conform to the Regulations, except where it is not practicable.

Completed Actions:

- Posted the accessibility policy and plan on the main site and all sub-sites.
- Created a Web Accessibility Committee to plan for making our Websites accessible to persons with disabilities.
- Developed accessibility guidelines and priorities in the implementation of accessible websites.

Planned Actions:

- When designing or updating Internet websites, Admill Group will ensure that the website is developed in accordance with the Regulation.
- In coordination with management, we will ensure that professional training sessions for the webmasters and ongoing training thereafter for new webmasters.
- Purchased license for web accessibility software and assigned support staff to implement ongoing organization-wide reports.
- Initiated a review process to ensure the main site and all sub-sites and web content on those sites conform to WCAG 2.0.
- Updated the AODA sections of the Company's main website and employee website to reflect the changes to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act (AODA), which came into effect on July 1, 2016.
- The Company's website and sub-sites were updated to comply with WCAG 2.0, Level AA as of January 2021.

- A copy of the accessibility policy, plan and training will be made available on the main website and is currently available on the Company's health and safety board on-site.

Required legislative compliance:

January 1, 2014 (WCAG 2.0, Level A)

January 1, 2021 (WCAG 2.0, Level AA)

Status: Implemented/ongoing



Feedback

To comply with section 11 of the IASR, the Company is in process of developing a feedback process to receive and respond to feedback about the manner in which we provide goods or services to people with disabilities.

Completed Actions:

- Ensure that the process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.
- Consult with the person making the request to determine suitability of format.
- Notification to the public of the availability of accessible formats and communication supports is noted on various locations including but not limited to, documents, websites, and forms.

Planned Actions:

- Regularly review feedback received to look for ways to remove barriers to accessibility and improve our customer service.

Required legislative compliance: January 1, 2015

Status: Implemented/ongoing

Accessible Formats and Communication Supports

Admill Group will provide, or will arrange for the provision of, accessible formats and communication support with respect to the Company's generated documents, to persons with disabilities upon request. The Company will do so in a timely manner and in a way that considers each person's accessibility needs due to disability.

Completed Actions:

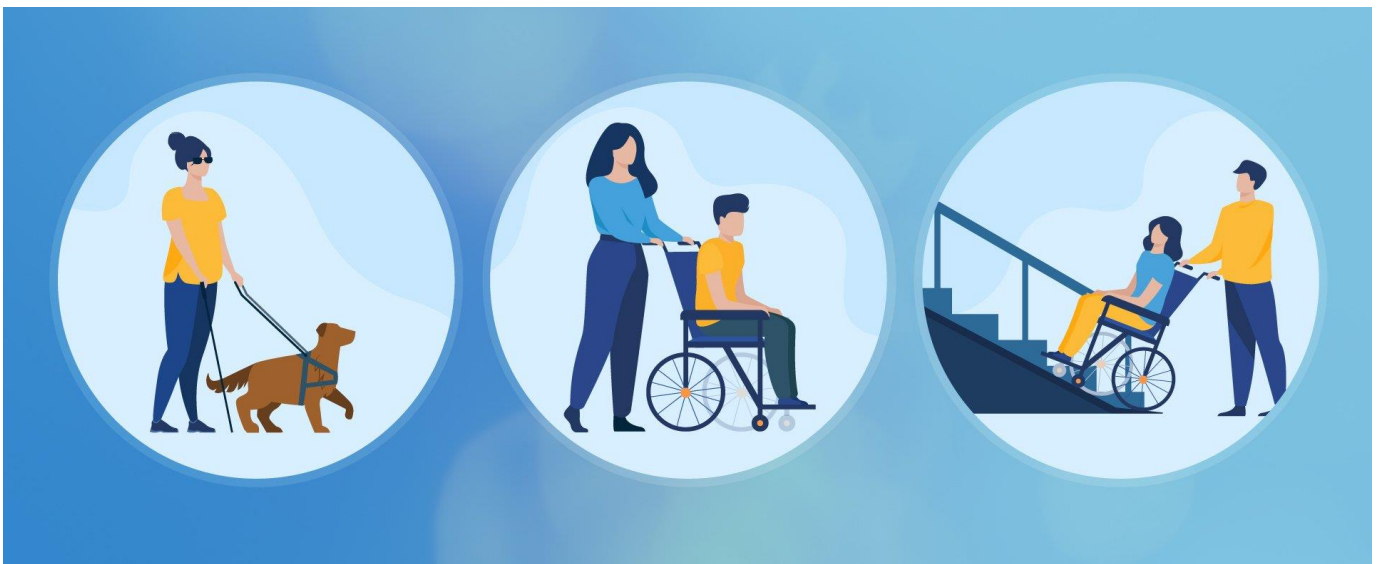
- Consult with the person making the request for accessible formats or communication supports and provide the information at a cost that is no more than the regular cost charged to others.
- Notification to the public of the availability of accessible formats and communication supports is noted on various locations including but not limited to, documents, websites, and forms.

Planned Actions:

- Continue to provide training to webmasters on how to create accessible documents.
- Continue to provide accessible formats or communication support when requested.

Required legislative compliance: January 1, 2016

Status: Implemented/ongoing



Employment Standard

Admill Group is committed to fair and accessible employment practices that attract and retain talented employees with disabilities. The Company will incorporate accessibility requirements under the employment standard to ensure that barriers are eliminated, and corporate policies are followed where applicable.

Recruitment

The Company will assess recruitment policies, practices and procedures, methods, and attitudes to identify and remove barriers to employment of persons with disabilities.

Completed Actions:

- Specify on the Company's website and in job advertisements, that accommodation is available for applicants with disabilities upon request.
- Notified employees and the public about the availability of accommodation in its recruitment processes for applicants with disabilities.
- Inform candidates about the availability of accommodations:
 - when called for an interview
 - during the selection process
 - at the time of job offer
 - at orientation
- If the selected applicant requests accommodation, consult with the applicant, and arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs.
- When making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities.

Planned Actions:

- Continue to promote/welcome persons with disabilities to apply for positions within the Company.
- Provided new employees with the same structure for recruitment as was offered previously to existing employee which includes standard job advertisement template and a guideline document on how to invite persons with disabilities to apply for positions.

Required legislative compliance: January 1, 2016

Status: Implemented/ongoing

Support Information for Employees

Admill Group will assess its supporting documents, policies, practices and procedures, methods, and attitudes to identify and remove barriers to employment of persons with disabilities.

Completed Actions:

- The Company will inform current employees and new hires soon after they begin employment all policies and procedures that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that consider an employee's accessibility needs due to disability.
- Provide information under this section to new employees as soon as practicable after they begin their employment.
- Keep employees up to date on changes to policies.

Planned Actions:

- Provide accessible formats and communication support to any employees who request them. If requested, the Company's Human Resource Department will consult with the employee to provide or arrange for provision of accessible formats and communication supports for:
 - information that is needed in order to perform the employee's job
 - information that is generally available to employees in the workplace

Required legislative compliance: January 1, 2016

Status: Implemented/ongoing



Documented Individualized Accommodation Plans

Admill Group will assess its return-to-work and accommodation plans, practices and procedures, methods, and attitudes to identify and remove barriers to employment of persons with disabilities.

Completed Actions:

- The process allows the employee requesting accommodation to participate in the development of the plan.
- The process includes a means by which the employee is assessed on an individual basis.
- The Company currently provides an individualized accommodation plan in writing to any employee with a disability, and additionally modified duties are offered in certain circumstances depending on the employee's case.
- The Company may request an evaluation by an outside medical or other expert, at the Company's expense, to assist the Company in determining if and how accommodation can be provided.
- Provide an individualized return-to-work plan in writing for any employee who has been absent from work due to a disability and requires disability-related accommodation to return to work.
- Steps are taken to protect the privacy of the employees' personal information.
- The Company's HR representative will ensure that the frequency in which individual accommodation plans will be reviewed, and updated and the best accommodation that can be offered.
- The Company will provide the individual accommodation plan in a format that takes into account the employee's accessibility needs.
- Any individualized workplace emergency response information is included in the plan.
- Identify any other accommodation that is to be provided to the employee, including ergonomic assessments and assistive devices, as required.

Planned Actions:

- In the event that the Company is unable to offer an accommodation due to undue hardship, the HR representative will provide the employee with the reasons for the denial if the individual accommodation plan is denied.

Required legislative compliance: January 1, 2016

Status: Implemented/ongoing

Performance Assessment, Career Development and Advancement and Redeployment

Admill Group will assess its performance reviews, career development and advancement, redeployment programs, policies, practices and procedures, methods, and attitudes to identify and remove barriers to employment of persons with disabilities.

Completed Actions:

- Regularly review and revise the Company's performance development process as needed.
- Ensure the accessibility needs of employees with disabilities and their individualized accommodation plans are taken into account:
 - when assessing their performance
 - in managing their career development and advancement
 - when redeploying them
- Provide information regarding performance management, career development and advancement, and redeployment in an accessible format upon request.
- Accessibility objectives will be included in yearly performance development plans for employees as needed.

Required legislative compliance: January 1, 2016

Status: Implemented/ongoing



Design of Public Spaces Standard

Admill Group is committed to greater accessibility in, out of, and around the buildings we use. The Company will ensure that facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.

Completed Actions:

- Exterior paths of travel (sidewalks or walkways) and associated elements such as ramps, stairs, and curb ramps, when renovated and/or built new comply with the set Regulations.
- Accessible off-street parking spaces when renovated and/or built new comply with the set Regulations.
- The Company is committed to maintaining the accessible parts of our public spaces. When any renovation/new construction to an accessible area is underway. The Company's designated representative will post a sign to explain the disruption and set up a temporary alternative.

Planned Actions:

- Continue to comply with all set Regulations under the Design of Public Spaces Standard and keep abreast regarding any changes to the set Regulations.
- When renovated/new spaces are being built, service counters and waiting areas/lines will comply with the set Regulations.

Required legislative compliance: January 1, 2017

Status: Implemented/ongoing

Transportation Standard

Admill Group is dedicated to ensuring accessible transportation for all in full compliance with the Ontario Disabilities Act. This commitment extends to the proper use, maintenance, and operation of lift-powered devices, such as forklifts and lift trucks, which are essential for facilitating safe mobility.

All forklifts are regularly inspected to ensure they remain in optimal working condition, and all operators are required to be fully certified to operate these lift-powered trucks.

In addition, forklift operators must wear appropriate personal protective equipment (PPE), including safety shoes, to minimize risks and promote a secure environment.

Admill Group strictly follows safety protocols and conducts regular inspections to maintain the highest standards of safety. By adhering to these measures, Admill Group guarantees a safe, inclusive environment that fosters equal access to mobility and opportunity for individuals with disabilities, ensuring they are provided with the dignity and accessibility they deserve.

How to Contact Us

Admill Group has a process in place for receiving and responding to feedback that is accessible to people with disabilities. For more information, questions, or concerns regarding accessibility at Admill Group or to request communication in an accessible format please contact the Human Resources department.

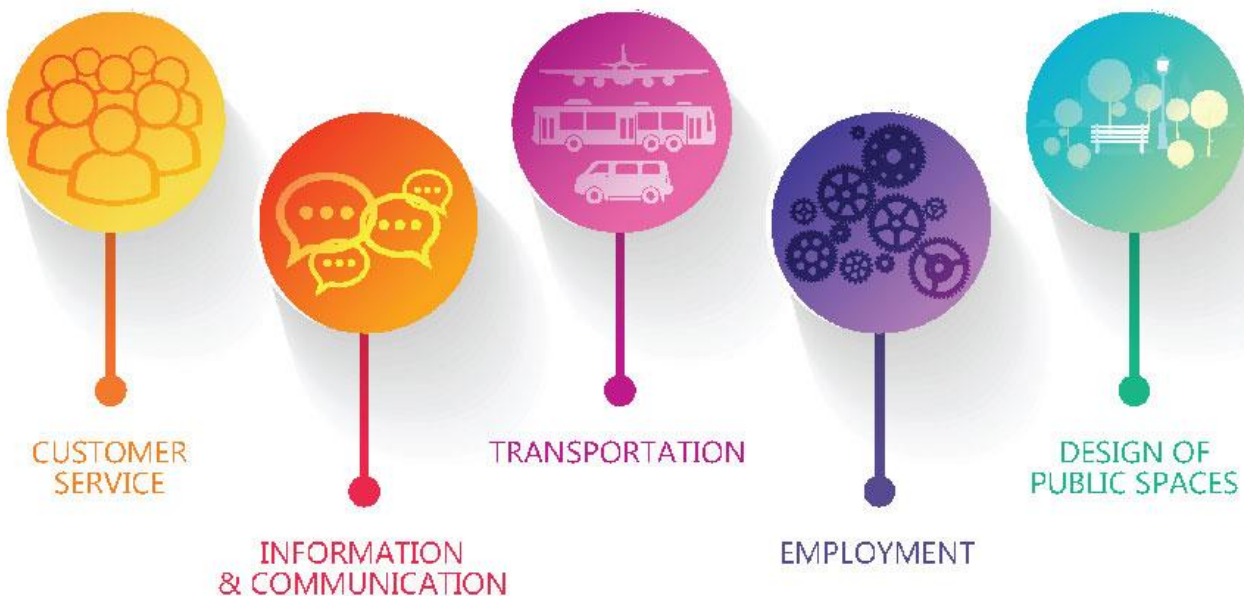
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Resources

The following resources were utilized in the creation and research of this document.

Ministry of Labour, Accessibility for Ontarians with Disabilities Act

[Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 | ontario.ca](#)

Accessibility for Ontarians with Disabilities Act

[Accessibility for Ontarians with Disabilities Act \(AODA\)](#)

Ontario Human Rights Commission and Accessibility Requirements

[Working together: free online training on AODA requirements | Ontario Human Rights Commission](#)

Canadian Centre for Occupational Health and Safety

[CCOHS: Accessibility for Ontarians with Disabilities Act \(AODA\)](#)