

## Accessibility Plan

### Overview

In order for 407 ETR Concession Company Limited (“**407 ETR**”) to meet and sustain compliance with the *Accessibility for Ontarians with Disabilities Act* (“**AODA**”), an ongoing commitment is required to build accessibility into existing and new policies. The goal is to achieve the most effective and efficient access to our goods, services, and information for all users, and in a manner that respects the dignity and independence of users with disabilities.

This Multi-Year Accessibility Plan (the “**Plan**”) focuses on the steps 407 ETR takes to comply with AODA, and the *Integrated Accessibility Standards Regulation (IASR)* enacted under AODA. The related initiatives not only support compliance with the existing Accessibility Standards for Customer Service, but they also help us enhance accessibility in other areas:

- Customer Service Standard
- Information and Communications Standard
- Employment Standard
- Design of Public Spaces Standard, applies only to accessible elements in public spaces, i.e. waiting areas.
- Training – Ongoing training is provided year to year

This Plan is reviewed at a minimum every 5 years and revised as applicable.

### Our Commitment

407 ETR is committed to making accessibility throughout the organization a reality. We will continue to identify and remove barriers in order to ensure 407 ETR achieves accessibility for all individuals in a manner that is consistent with AODA’s core principles of dignity, independence, integration and equality of opportunity. We remain committed to meeting the accessibility needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

### Our Plan

#### Customer Service Standard

407 ETR implemented the AODA – Customer Service Standard in 2011. 407 ETR is committed to ensuring that people with disabilities receive accessible goods and services in a timely manner.

We will continue to ensure compliance to the AODA – Customer Service Standard, through regular reviews of our processes and internal audit processes to test knowledge and understanding of AODA.

#### Feedback Requirement

407 ETR’s feedback process responds to inquiries and suggestions received by: mail, e-mail, telephone or visiting 407 ETR’s website and completing the AODA Feedback Box. All such feedback and acknowledgements is provided in a format accessible to the individual, taking into account an individual’s disability. The privacy of individuals providing feedback to 407 ETR is respected.

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The existing feedback process has been designed in a manner that allows it to meet the feedback requirements of the IASR. If a complaint is received about the manner in which 407 ETR provides goods, services or facilities to persons with disabilities, we will acknowledge receipt in a timely manner. Feedback and complaints will be redirected to a designated contact person. Individuals can expect to hear back within ten (10) business days of receipt of the feedback correspondence, where applicable. 407 ETR will communicate any resulting actions based on concerns or complaints that were submitted. Responses to feedback to be provided in an accessible format and/or with necessary communication supports.

### Training Requirement

407 ETR introduced AODA Training as part of the AODA – CSS implementation. Training components that address the additional AODA – IASR requirements (detailed below) were introduced in 2014. 407 ETR will train employees, staff and volunteers who interact with the public or third parties on its behalf, or who participate in developing company policies, on the CSS of the AODA.

Training with respect to the Customer Service Standard will include: how to interact and communicate with persons with various types of disability; how to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person; the proper use of assistive devices; and what to do if a person with a particular type of disability is having difficulty accessing our goods or services. Records of training will be kept. If a person with a disability is accompanied by a support person, we will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person.

All 407 ETR employees will continue to receive AODA training on an ongoing basis, including when changes are made to relevant policies, practices and procedures and if there is a change in circumstance or role warranting additional or more frequent training. Additionally AODA training is included as part of 407 ETR's New Employee Orientation Program.

## **Information and Communications Standard**

### Feedback Requirement

As part of the implementation of the AODA – Customer Service Standard, 407 ETR created and introduced its AODA Feedback Process. 407 ETR welcomes and appreciates all forms of feedback. We are also committed to establishing and maintaining a process for receiving and responding to feedback about how our services are provided to people with disabilities.

407 ETR ensures that the processes for receiving and responding to feedback are accessible to persons with disabilities and will provide or arrange for the provision of accessible formats and communications supports, upon request and in a timely manner.

### Accessible Websites and Web Content

407 ETR Internet and intranet websites, technology solutions, communications materials, telephone communications and in-person interactions will be based on accessibility-best practices.

407 ETR has adopted the World Wide Web Consortium Web Content Accessibility Guidelines (**WCAG**) 2.0 Level AA as its standard for its website and web content. This means that any new web sites created are implemented conforming to WCAG 2.0 Level AA. 407 ETR will ensure that all internet websites and web content conform with WCAG 2.0 Level AA, other than, success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded). Except where meeting the requirement is not practicable

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within the meaning of the AODA and its Regulations, this commitment applies to all web content published on a website after January 2012, and all websites and web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modification of the product. By achieving compliance with WCAG 2.0 Level AA, employees and customers will receive web information in accessible formats. This will provide them equal and appropriate access to the information they need.

#### Publicly Available Information and Notices of Temporary Disruption

407 ETR will take the following steps to make sure all publicly available information is made accessible to persons with disabilities upon request:

- 407 ETR will review its existing processes for providing the public with information, to ensure that disabled individuals can also receive such information in a manner that meets their particular needs.
- Upon request and in a timely manner, 407 ETR will provide an accessible format and/or communication support to enable an individual with a disability to receive publicly available information.
- Requested information will be provided in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
- 407 ETR will consult with the person making the request to determine the suitability of the accessible format or communication support that is requested
- 407 ETR also has procedures for preventative and emergency maintenance of accessible elements and for dealing with temporary disruptions when accessible elements are not in working order. This will include signage and/or other types of notifications where applicable.

#### **Design of Public Spaces Standard**

Although 407 ETR does not have public spaces such as recreational trails, public use eating areas outdoor play spaces, service counters or fixed queuing guides, the standard does include requirements for making waiting areas accessible to people with disabilities. These elements can be located both inside and outside of buildings. It is important to note that these elements are not covered by Ontario's Building Code. In the event that 407 ETR is building or making any major modifications to a public space it will comply with all legislative requirements, including those mandated by the AODA.

#### Maintenance Planning

407 ETR ensures steps for preventative and emergency maintenance of the accessible parts of our public spaces are in place. 407 ETR also has procedures for handling temporary disruptions when an accessible part of their public spaces is not usable. This will include signage and/or other types of notifications where applicable.

#### Obtaining Services

#### **Service Counters and In-person appointments**

Individuals who require in-person assistance may request an appointment at 407 ETR's premises. The in-person appointments are introduced as a means to assist customers who are unable to fulfil their

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requests (e.g., anonymous account set-up, AODA accessibility issues or concerns etc.) using available remote methods, as listed in the “Feedback Process” section above. 407 ETR ensures that when building or replacing existing service counters, at least one service counter is accessible to people who use mobility aids, such as wheelchairs and that we clearly identify all accessible service counters with signage.

**Fixed queuing guides**

407 ETR does not use fixed queuing guides but should a decision be made to install such guides 407 ETR will make sure:

- The queuing area is wide enough for people using mobility aids, such as wheelchairs, and mobility assistive devices, such as canes, crutches and walkers, to move through the line, including when the line changes direction.

**People who are blind or have low vision can find the queuing guides with a cane.**

**Waiting areas**

When building new or making planned significant alterations to 407 ETR’s existing waiting areas that have seating fixed to the floor, we ensure that at least three per cent of the new seating space is accessible with at least one accessible seating space being made available.

**Employment Standards**

407 ETR is committed to fair and accessible employment practices. This commitment applies at all stages of the employment relationship. 407 ETR continues to develop and implement employment practices to encourage persons with disabilities to participate fully in all aspects of the organization by:

- identifying and removing workplace barriers;
- inclusive employment processes for recruitment, retention and employee development;
- providing managers with accessibility training, tools and templates to support employee/workplace accommodation and address non-discrimination; and
- continuously reviewing standards and best practices related to accessible employment.

**Recruitment**

407 ETR notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

During the recruitment process, 407 ETR 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.

If a selected applicant requests an accommodation, 407 ETR 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.

When making an offer of employment, 407 ETR informs the successful applicant of its policies for accommodating employees with disabilities.

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Informing employees of supports

407 ETR informs 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.

407 ETR shall provide support information to new employees as soon as practicable after they begin their employment.

407 ETR provides 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.

Accessible formats and communication supports for employees

Where an employee with a disability so requests it, 407 ETR consults with the employee to provide or arrange for the provision of accessible formats and communication supports for any:

- information that is needed in order to perform the employee's job;
- information that is generally available to employees in the workplace; and
- the suitability of an accessible format or communication support.

Workplace emergency response information

407 ETR provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and 407 ETR is aware of the need for accommodation due to the employee's disability.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, 407 ETR shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

407 ETR shall provide the information as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.

407 ETR reviews 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 407 ETR reviews its general emergency response policies.

Documented individual accommodation plans

407 ETR has a written process for the development of documented individual accommodation plans for employees with disabilities.

Individual accommodation plans include:

- any information regarding accessible formats and communications supports provided;
- individualized workplace emergency response information; and

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- identifies any other accommodations that are to be provided.

### Return to Work

407 ETR has a documented 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.

The return to work process:

- outlines the steps 407 ETR takes to facilitate the return to work of employees who were absent because their disability required them to be away from work; and
- uses documented individual accommodation plans as part of the process.

407 ETR's AODA 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.

### Performance Management

Any performance management 407 ETR uses in respect of its employees takes into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

### Career Development and Advancement

407 ETR takes 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.

### Redeployment

407 ETR takes into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities

## **Training**

All 407 ETR staff receive training on Ontario's accessibility laws (the AODA and the IASR) and on the *Human Rights Code* as it relates to people with disabilities. Training will be appropriate to the duties performed by the individual. Training will be provided as soon as practicable after an individual begins working or providing services. Through ongoing education and awareness, 407 ETR gives employees the knowledge and skills they need to meet or exceed compliance requirements. This includes developing alternate formats and creating documents, processes and policies with accessibility in mind. 407 ETR will keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

### **For more information:**

For more information on this accessibility plan, or to obtain this document in accessible formats, please contact Office of the President at:

- Phone: 1-888-407-0407
- Email: [DisabilitiesFeedback@407etr.com](mailto:DisabilitiesFeedback@407etr.com)