

**TITLE: Multi-year Accessibility Plan for Ontario****Introduction**

Graham Group Ltd. strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility. This accessibility plan outlines the steps that Graham Group Ltd. has and/or is taking to meet the requirements of the Accessibility for Ontarians with Disabilities Act, and illustrates how Graham Group Ltd. will play its role in making Ontario an accessible province for all Ontarians. This document includes a summary of the accessibility initiatives Graham Group Ltd has completed.

**Statement of Commitment**

Graham Group Ltd. 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. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

**CUSTOMER SERVICE STANDARD****Accessibility Barriers**

- Graham Group Ltd. undertook an assessment of potential accessibility barriers and continues to monitor the accessibility of buildings and spaces that could potentially limit people's access to services, such as ensuring automatic doors are in working order and washrooms are accessible.
- Graham Group Ltd. will ensure existing feedback processes are accessible to people with disabilities upon request.
- Graham Group Ltd. updated the company website and the contents to conform with WCAG 2.0, Level A by January 1, 2014, and has updated the website and the contents to conform with WCAG 2.0, Level AA prior to January 1, 2021.
- Graham Group Ltd. has provided training to employees on how to appropriately interact and communicate with customers who have disabilities and use accessible equipment.
- Graham Group Ltd. are committed to providing information about our organization and its services, including public safety information, in accessible formats or with communication supports.
- Graham Group Ltd. will ensure employees consider the needs of people with disabilities when designing, procuring, or acquiring self-service kiosks.

**Accessible Emergency Information**

- Graham Group Ltd. is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

**TITLE: Multi-year Accessibility Plan for Ontario****INFORMATION AND COMMUNICATION STANDARD**

- Graham Group Ltd. updated the company website and the contents to conform with WCAG 2.0, Level A by January 1, 2014, and has updated the website and the contents to conform with WCAG 2.0, Level AA prior to January 1, 2021.
- Graham Group Ltd. will create and provide accessible formats and communication supports to people with disabilities in a timely manner when requested and will do so at our expense.

**EMPLOYMENT STANDARD****Recruiting and Hiring**

- Graham Group Ltd. notify applicants that accommodations are available on our company career page, in our job postings, and verbally or in writing when we invite applicants to an interview.
- When making a job offer, Graham Group Ltd. notifies successful applicants of our accommodations policies, who they should contact if they wish to request an accommodation, and encourage them to make any requests as soon as possible so that suitable accommodations can be implemented before their start date.
- Graham Group Ltd. has provided training to recruiters and hiring managers to consult with applicants when they have requested accommodations.
- Graham Group Ltd. will communicate any changes to our workplace policy on accommodations.
- Graham Group Ltd. will provide information to our employees in accessible formats and/or communication supports when requested.

**Individual Accommodation Plans**

- Graham Group Ltd. will consult with employees with disabilities to develop and document an individual accommodation plan based upon their individual needs.
- If required, Graham Group Ltd. will request an evaluation by an outside medical or other expert, at our expense, to assist us in determining if or how accommodation can be achieved.

**Performance Management and Career Development**

- Graham Group Ltd. will consider an employee's disability when providing any type of feedback for the purposes of performance management and/or career development, including referencing the employee's individualized accommodation plan.
- When employees are transferred or promoted, Graham Group Ltd. will consider their disability when providing feedback, coaching, and development; and will reference and update the employee's individualized accommodation plan as required.

**Individualized Emergency Response Plans**

- Graham Group Ltd. will create an individualized emergency response plan for any employee with a disability who requires such a plan and will make changes to the plan whenever the employee's location changes and when the employee's accommodations are reviewed.

**TITLE: Multi-year Accessibility Plan for Ontario****Return to Work Process**

- Graham Group Ltd. will create a return to work process for employees with disabilities who have been absent from work due to a disability and require disability-related accommodations to return to work, including creating and/or updating their individual accommodation plan.

**Training**

- Graham Group Ltd. provides training to employees, volunteers, and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training is provided to all new hires within two weeks of their hire date. This training is comprised of six modules that provide an overview of the AODA standards and compliance requirements:
  - Module 1: Compliance Requirements
  - Module 2: Information and Communication Standards
  - Module 3: Employment Standards
  - Module 4: Transportation Standards
  - Module 5: Design of Public Spaces Standards
  - Module 6: Customer Service Standards
- Graham Group Ltd. tracks the progress and completion of training for all employees to ensure it is completed within a set timeframe from their start date.

**DESIGN OF PUBLIC SPACES STANDARDS**

- Graham Group Ltd. will meet the Accessibility Standards for the Design of Public Spaces when building, making major modifications, maintaining, and restoring public spaces such as outdoor paths of travel like sidewalks, ramps, stairs, and curb ramps, accessible parking, and service-related elements like service counters, fixed queuing lines and waiting areas with fixed seating.

**For More Information**

For more information on this accessibility plan, please contact Graham Human Resources at:

- Phone: 905-694-4028
- E-mail: [doreen.ridley@graham.ca](mailto:doreen.ridley@graham.ca)
- Mail: 6108 Edwards Blvd.  
Mississauga, ON  
L5T 2V7

Accessible formats of this document are available free upon request from:

Graham Toronto Operations Office  
6108 Edwards Blvd.  
Mississauga, Ontario  
L5T 2V7