

AODA MULTI-YEAR ACCESSIBILITY PLAN

Introduction

This accessibility plan outlines the policies and actions that The Coughlan Group of Companies has and will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the Integrated Accessibility Standards, Ontario Regulation.

The AODA Multi-Year Accessibility Plan outlines achievements and actions that The Coughlan Group of Companies have taken, and the work undertaken to improve opportunities for people with disabilities. The current plan covers the next 5 years (2022 to 2027) to align with the business goals and strategic plans.

Our President's Statement of Commitment

At the Coughlan Group of Companies, we are committed to treating all people in a way that allows them to maintain their dignity and independence in a respectful and safe manner. We believe in inclusion and equal opportunity for both our customers and our employees. We strive to ensure we meet the needs of people with disabilities in a timely manner and are committed to making improvements to remove barriers and prevent new barriers when it comes to meeting the accessibility requirements under the AODA Act.

The Coughlan Group of Companies is committed to develop, implement and maintain policies that oversee how we will achieve accessibility through the Accessibility for Ontarians with Disabilities Act (AODA)'s Customer Service Standard, Integrated Accessibility Standard Regulation (IASR), and all other standard as they are developed and are in accordance with requirements of the Ontario Human Rights Code.

Identification of Barriers

The Coughlan Group of Companies values input from the public, our stakeholders and our employees and seeks their input through a variety of various communication channels, such as email, phone or in person. All data and information that is collected is reviewed regularly and used to update or improve our current policies and practices.

Review of our AODA Multi-Year Accessibility Plan

The Coughlan Group of Companies plan will be reviewed annually and updated as required based on current information and legislation, with updates occurring no less than every 5 years.

Standards of Accessibility under AODA

1. General Requirements

(i) Accessible Emergency Information

Where required, Coughlan Group of Companies, will create individualized workplace emergency response plans for employees with disabilities. This information will be created in consultation with the employee and consider the unique challenges created by the individual's disability and the physical nature of the workplace.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; or

- The company reviews general emergency response policies.

(ii) Accessibility Policies and Plans

Coughlan Group of Companies will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality.
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services, if this does not present a health and safety risk.
- Using alternative methods, when possible, to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner.
- Considering individual accommodation needs when providing goods and services; and
- Communicating in a manner that considers the customer's disability.

(iii) Training

Coughlan Group of Companies provide training for its employees regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities.

Training will be provided as soon as is reasonably practicable, but no later than two weeks after their starting date with the company. Training will be provided regularly to new employees and as changes to the companies' accessibility policies occur. Coughlan Group of Companies will provide training to all members of our organization. This training will include:

- An overview of the Accessibility for Ontarians with Disability Act, 2005 (AODA) and the requirements of the customer service standard.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- What to do if a person with a disability is having difficulty in accessing goods and/or services.
- Staff will also be trained when changes are made to the policies and procedures associated with AODA.

Coughlan Group of Companies will maintain records on the training provided, when it was provided, and the number of employees who were trained. Records will be maintained electronically and within employee files.

2. Customer Service Standard

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the company. We will ensure that our staff is trained and familiar with various assistive devices we have on site (telephone, wheelchair, and ramp) or those brought onto the premises which may be used by customers with disabilities while accessing our goods or services.

At Coughlan Group of Companies, we welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public. If we cannot easily identify that an animal by a result of visual indicators such as the vest or harness worn by the animal is a service animal, we will ask the person to provide documentation from a regulated health care professional including:

- College of Audiologists and Speech-Language Pathologists of Ontario;
- College of Chiropractors of Ontario;
- College of Nurses of Ontario;
- College of Occupational Therapists of Ontario;
- College of Optometrists of Ontario;
- College of Physicians and Surgeons of Ontario;
- College of Physiotherapists of Ontario;
- College of Psychologists of Ontario; or
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

A support person(s) is defined as another person who accompanies a person with a disability in order to help with communication, mobility, personal care, or medical needs, or with access to goods, services, or facilities. If a person with a disability requires the accompaniment of a support person for health and safety reasons we will:

- Consult with the person with a disability to understand their needs.
- Consider health or safety reasons based on available evidence.
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

In such a situation, we will waive the admission fee or fare for the support person, if one exists.

3. Information and Communication Standard

We will communicate with people with disabilities, including guests and employees, in ways that take into account their disability. This includes, but not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Coughlan Group of Companies will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

4. Employment Standard

(i) Recruitment

Coughlan Group of Companies is committed to an inclusive, barrier-free work environment, recruitment and selection process. The company will notify employees and the public about the availability of accommodation for job applicants who have disabilities on our job postings. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods.

Where an accommodation is requested, the company will consult with the applicant and provide or arrange for suitable accommodations in a manner that considers the applicant's accessibility needs due to disability. Successful applicants will be made aware of the company's policies and supports for accommodating people with disabilities in their offer of employment.

Cougs Investments Ltd. will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career

development or advancement opportunities

(ii) Documented Individual Accommodation Plans

Coughlan Group of Companies will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The development process for these plans will include:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed individually and that the company can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine whether accommodation can be achieved, or how it can be achieved;
- The frequency with which the individual accommodation plan should be reviewed, how it should be done and how the reasons of a denial will be provided to the employee; and
- The steps taken to protect the privacy of the employee's personal information and the means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

(iii) Return to Work

Coughlan Group of Companies will develop and implement return-to-work processes for employees who are absent from work due to a disability and require disability-related accommodations to return to work. The process will outline the steps the company will take to enable a smooth return to work for the employee. All steps and individual accommodation plans will be documented and created in consultation with the employee.

Design of Public Spaces

In the event of a planned or unexpected disruption of services or facilities for customers with disabilities, Coughlan Group of Companies will notify customers promptly. There will be a notification posted on site and on our website that will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services available.

Communication of Multi-Year Accessibility Plan

The Coughlan Group of Companies AODA Multi-Year Accessibility Plan will be posted on our websites. Alternative formats will be made available upon request. If you have any questions regarding the plan, please contact us:

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