

Multi-year Accessibility Plan

This plan is intended to outline BrandSafway’s strategy to prevent and remove barriers and meet its Accessibility for Ontarians with Disabilities Act (AODA) requirements. BrandSafway takes its obligation under the Integrated Accessibility Standards Regulation (IASR) very seriously and will review and revise this Multi-Year Accessibility Plan on a regular basis, as deemed necessary. At a minimum, this plan will be reviewed and updated at least once every five years, with the first update due November 30, 2026.

SCOPE

This plan applies to all BrandSafway Ontario employees who deal with members of the public, including full-time, part-time and temporary employees, summer students and people acting on behalf of BrandSafway (e.g. consultants, third-party contractors, etc.). It also applies to all employees who participate in developing and approving BrandSafway’s policies, practices and procedures governing the provision of goods, services and facilities.

Multi-year Accessibility Plan:

Part 1: General Requirements

Initiative	ISAR Requirement	Action	Status • In Progress • Ongoing • Completed	Responsibility Lead
1.1 Establishment of Accessibility Policies	Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<ul style="list-style-type: none"> • Policy completed and posted on BrandSafway’s external website and internal HR intranet – onboarding website for Ontario. • Communicate to IT and Communication departments the requirement for websites, that the site and any web content must conform with WCAG 2.0, Level AA. 	In progress	Human Resources IT
1.2 Accessibility Plans	<p>Large organizations shall,</p> <p>(a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>(c) review and update the accessibility plan at least once every five years.</p>	<ul style="list-style-type: none"> • Plan completed and posted on BrandSafway’s external website. 	In progress	Human Resources IT
1.3 Training	Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the	<ul style="list-style-type: none"> • Develop training program to educate staff and managers on AODA legislation, ISAR and Human Rights Code to be rolled out to all BrandSafway 	Completed	Human Resources Health and Safety

	<p>Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization</p>	<p>employees in Ontario.</p> <ul style="list-style-type: none"> • Determine vehicle to deliver training. • Training to incorporate accessible format. • Modify new hire orientation checklist to include the requirement to train employees on AODA. • Determine mechanism for managing and tracking completion of training by BrandSafway Ontario people. 		
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Part 2: Information and Communications

Initiative	ISAR Requirement	Action	Status • In Progress • Ongoing • Completed	Responsibility
2.1 Feedback	<p>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</p>	<ul style="list-style-type: none"> • Ensure processes for receiving and responding to feedback are accessible to persons with disabilities by providing for accessible formats and communication supports upon request. 	Completed	Human Resources Health and Safety
2.2 Accessible Formats & Communication Support	<p>2.2.1 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,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p>	<ul style="list-style-type: none"> • Ensure that upon request the Company will arrange to provide accessible formats and communication supports for persons with disabilities and notify the public about the availability of accessible formats and communication supports. 	Completed	Human Resources Health and Safety Managers
2.3 Accessible Websites & Web Content	<p>Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.</p>	<ul style="list-style-type: none"> • Conducted an assessment current web functionality to ensure compliance and adequate accessibility features. • Ensure Technology and Content Owners (IT and Communication) are aware of ISAR requirements for existing web content. 	Ongoing	IT

Part 3 – Employment Standard

Initiative	ISAR Requirement	Action	Status • In Progress • Ongoing • Completed	Responsibility
3.1 Recruitment, General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<ul style="list-style-type: none"> • Incorporate language on postings and BrandSafway’s career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available during the recruitment, assessment, and selection process. • Consult with job applicants about suitable accommodations if accommodation is required. 	Completed	Human Resources Talent Partner Branch Partner
3.2 Recruitment, Assessment or Selection Process	<p>3.2.1 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.</p> <p>3.2.2 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.</p>	<ul style="list-style-type: none"> • Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request. 	Completed	Human Resources Talent Partner Branch Partner Manager
3.3 Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<ul style="list-style-type: none"> • Modify standard offer of employment letter to include notice of policies on accommodation for employees with disabilities. 	Completed	Human Resources Talent Partner Branch Partner Manager
3.4 Informing Employees of Supports	3.4.1 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.	<ul style="list-style-type: none"> • Inform employees of Company policies to support those with disabilities • Consult with the employee where accommodation of a disability is requested • Provide communication support to employees who need assistance in accessing information required to perform their job duties. 	Completed Ongoing Ongoing	Human Resources Managers
	3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> • Inform new employees of Company policies to support those with disabilities 	Ongoing	Managers
3.5 Accessible Formats and Communication Supports for Employees	3.5.1 In addition to its obligations under section 12, where an employee with a	<ul style="list-style-type: none"> • Educate employees and Performance Managers on the availability of accessible 	Ongoing	Human Resources Health and Safety Managers

	<p>disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>format and communication supports; in accordance with AODA.</p>		
	<p>3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> • Develop a process for consulting with employees to determine accommodation needs. • Develop a process for advising employee of solution. 	Ongoing	Health and Safety Human Resources Manager
3.6 Workplace Emergency Response Information	<p>3.6.1 Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p>	<ul style="list-style-type: none"> • Established process to provide people in Ontario who request, or for whom BrandSafway is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information. 	Ongoing	Human Resources Health and Safety Manager
	<p>3.6.2 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 designated by the employer to provide assistance to the employee.</p>	<ul style="list-style-type: none"> • BrandSafway process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the BrandSafway person to share the information with those designated to provide assistance in the event of an emergency 	Ongoing	Health and Safety Human Resources Manager
	<p>3.6.3 Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p>	<ul style="list-style-type: none"> • Upon request, the Local branch manager will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible. 	Ongoing	Human Resources Health and Safety Manager
	<p>3.6.4 Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p>	<ul style="list-style-type: none"> • BrandSafway process for creating Individualized Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs. 	Ongoing	Human Resources

	(c) when the employer reviews its general emergency response policies			
3.7 Documented Individual Accommodation Plan	3.7.1 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.	<ul style="list-style-type: none"> • Review of current accommodation processes and practices. • Develop a standard process for the development of individualized accommodation plans; in accordance with AODA. 	Ongoing	Human Resources
	<p>3.7.2 The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. 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 accommodation can be achieved and, if so, how accommodation can be achieved. 4. 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. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which 	<ul style="list-style-type: none"> • Create an SOP for the development of documented plans that will incorporate the following elements: <ul style="list-style-type: none"> - Manner in which employee can request. - Under which circumstances medical is required. - Who will be assessing the medical provided . - Work with disability partner to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests. - Accommodation Plans will incorporate confidentiality requirements and outline when, to whom and what information may be shared. • Prepare individual accommodation plans for employees with disabilities. 	Ongoing	Human Resources Health and Safety

	<p>the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
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