

Accessibility Policy

Department:	All
Prepared By:	People & Culture
Approved By:	President and CEO
Issue Date (y-m-d)	2024-05-16
Review Date:	N/A – initial release
Review Frequency:	Every 5 Years

1. Background

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is a Provincial Act with the purpose of developing, implementing, and enforcing accessibility standards to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises. Under the AODA, Ontario Regulation 429/07, Accessibility for Ontarians with Disabilities came into force on January 1, 2008. That regulation establishes accessibility standards specific to customer service for organizations that provide goods and services to members of the public or other third parties.

2. Purpose

Enova Power Corp. (Enova) is committed to taking all reasonable steps to sustain the health, safety, and dignity of employees, workers, and customers. Persons with disabilities, including those that use and/or need the use of a service animal, support person or assistive device, will be given an opportunity, equal to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of Enova. This policy applies to the provision of services by Enova and all persons who serve members of the public or other third parties on behalf of Enova. This includes persons who do so as employees, agents or contractors, volunteers, and students. Furthermore, it applies to all persons who participate in developing Enova's policies, practices and other procedures governing the provision of goods and services to members of the public or other third parties.

3. Scope

To provide a workplace that is accessible to all employees and customers in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

4. Multi-Year Accessibility Plan

Enova has developed an Integrated Accessibility Standards (IAS) Multi-year plan, in accordance with the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). This plan outlines the organization's strategy to prevent and remove barriers and meet its requirements under the regulation. This plan will be updated at least once every five years. This plan is available on our

5. Definitions

These are terms that are referenced in Enova's Accessibility Policy, and/or Integrated Accessibility Standards Regulation Multi-year Plan.

5.1.1 Accessible Formats

Formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities

5.1.2 Accommodation

The special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

5.1.3 Assistive Device

Any piece of equipment or product used to assist persons with disabilities to increase, maintain or improve functional capabilities when accessing the services provided by Enova (can also be referred to as a Mobility aid, Medical aid, or Mobility Assistive Device).

5.1.4 Communication Supports

May include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

5.1.5 IAP

Individualized Accommodation Plan.

5.1.1 Nurse

A Registered Nurse or Registered Practical Nurse who is a registered member in good standing with the College of Nurses of Ontario.

5.1.1 Physician

A physician who is a registered member, in good standing with the College of Physicians and Surgeons of Ontario.

5.1.2 Redeployment

The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

5.1.3 Service Animal

A 'service animal' is defined as either a 'guide dog' as defined in section 1 of the Blind Persons Rights' Act, R.S.O. 1990, c.B.7; or any animal used by a person with a disability, including but not limited to a dog, if:

It is readily apparent that such animal is used by the person for reasons related to his or her disability; or

If the person provides a letter from a physician or nurse confirming that the person

requires such animal for reasons relating to his or her disability.

5.1.4 Service Disruption

For the purpose of this policy, a service disruption is the planned or unplanned unavailability of facilities or services provided by Enova, such as elevators and websites.

5.1.5 Support Person

For the purpose of this policy, a support person is someone who accompanies a person with a disability to assist him or her with communication, mobility, personal care, medical needs or access to goods or services.

6. General Principles

6.1.1 The Provision of Goods and Services to Persons with Disabilities

Enova will take all reasonable steps to ensure that its policies, practices and procedures are consistent with the principles of independence, integration, dignity and equal opportunity.

6.1.2 Training

Enova will take all reasonable steps to ensure that all persons to whom this policy applies receive training in Accessibility for Ontarians with Disabilities. Training will be provided as soon as practicable upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur. The format and amount of training will be customized to suit each person's interactions with the public and his or her involvement in the development of policies, procedures and practices pertaining to the provision of goods and service. At a minimum, the training will include:

- A review of the purposes of the Act.
- 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 guide dog or other service animal or the assistance of a support person.
- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

Enova will keep records of the training provided including dates the training is provided and the number of persons trained.

6.1.3 Individual Accommodation Plan (IAP)

Enova shall have in place a written process for developing a documented individual accommodation plan for employees with a disability. Process to include the following:

- The employee's participation in the development of the IAP;

- Assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- Enova may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- Employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace where not represented by a bargaining agent;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- Identification of any other accommodation that is to be provided.

6.1.4 Communication with Persons with Disabilities

When communicating with a person with a disability, Enova will do so in a manner that is respectful of the person's disability. The individual with a disability may request an accommodation and/or alternate formats to facilitate their interaction with Enova. Enova staff and volunteers who deal with members of the public will work with the individual with a disability to provide a timely and appropriate accommodation and/or alternate format.

6.1.5 Temporary Service Disruptions

Temporary disruptions in Enova's services and facilities may occur that may or may not be within Enova's control or knowledge.

Enova will make reasonable effort to provide public notice of the disruption including a description of alternate facilities or services if applicable. Enova will make reasonable effort to provide advance notice of planned disruptions recognizing that in some circumstances such as unplanned temporary disruptions, advance notice will not be possible. When temporary disruptions occur, notices will be posted in visible places at or on our facilities or by any other method that is reasonable under the circumstances including Enova's website.

6.1.6 Service Animals

Persons with a disability who are accompanied by a service animal are welcome at Enova facilities that are open to the public and the animal is not otherwise excluded by law. If a service animal is excluded by law, Enova will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from Enova's goods and services.

If it is not readily apparent that the animal is a service animal, Enova may ask the person with a disability for a letter from a physician or a nurse confirming that the person requires

the animal for reasons relating to his or her disability.

It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

6.1.7 Support Persons

A person with a disability may be accompanied by a support person and have access to the support person while on the premises. Enova may require a person with a disability to be accompanied by a support person where it is necessary to protect the health or safety of the person with a disability or the health and safety of other on the premises.

If, in the presence of a support person, personal information is being discussed, Enova staff must ensure that the individual consents to the support person being present. Consent can be given verbally or in writing.

6.1.8 Assistive Devices

A person with a disability may provide their own assistive devices to assist with accessibility. The only exception could be if it is deemed that the assistive device poses a risk to the health and safety of a person with a disability or the health and safety of others on the premises.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

6.1.9 Availability and Format of Accessibility for Ontarians with Disabilities

This policy and any other documents key to the delivery of goods and services will be made available upon request from Enova's Customer Service Department. This document can be provided in alternate accessible formats upon request.

7. Feedback

Enova is committed to high quality service to all its customers and feedback is always welcomed as it may serve to encourage continuous customer service improvements. Feedback from persons with disabilities may be given by telephone, in person, in writing, in electronic format or through other methods.

Enova staff will respond within two weeks to the author of the feedback. The author of the feedback will be provided with a response that will outline the actions taken to resolve the concern, if any.