

**Integrated Accessibility Standards Regulation (IASR) – Multi Year Plan (2024 - 2029)**

This Multi-year Plan for Enova Power Corp. (Enova) has been developed in accordance with the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

<b>Part I – General Requirements</b>					
<b>Section</b>	<b>Initiative</b>	<b>Description</b>	<b>Action</b>	<b>Status</b>	<b>Compliance Date</b>
<b>3</b>	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirement under the accessibility standards referred to in this Regulation.	Enova will review policies annually.  Enova will create an Accessibility Policy and related policies.	<b>Completed</b>	February 1, 2024
<b>4</b>	Accessibility Plans	4. (1) Large Organization shall, 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 requirement under this Regulation; b) Post the accessibility plan on their website if any, and provide in an accessible format upon request; and c) Review and update the accessibility plan at least once every five years.	a) Multi-Year Action Plan is completed. b) Accessibility Policy and Multi-Year plan posted on Enova’s corporate website. c) Plan to be reviewed and updated no less than every five years as legislation requires.	<b>Completed</b>	February 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
6	Self-Service Kiosks	6. (2) Large organizations and small organizations shall have regard to the accessibility for person with disabilities when designing procuring or acquiring self-service kiosk.	<p>Not Applicable.</p> <p>Enova does not operate/offer self-serve kiosks at this time.</p>	N/A	
7	Training	<p>7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as to pertains to persons with disabilities to</p> <ul style="list-style-type: none"> <li>a) all employees and volunteers</li> <li>b) all persons who participate in developing the organization’s policies; and</li> <li>c) All other persons who provide goods, services, or facilities on behalf of the organization.</li> </ul>	<p>Enova will ensure that training is provided to all employees, and volunteers, and those that develop the organizations policies, in a timely manner.</p> <p>Training will be provided if changes are made to the Accessibility policy.</p> <p>Training records for employees and volunteers will be maintained upon completion.</p> <p>Enova will inform employees when they must review training, and Enova will create a training schedule for training of new and current staff on a yearly basis.</p>	Ongoing (Yearly)	January 1, 2024

**Part II – Information and Communications Standards**

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	<p>11. (1) 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> <p>(2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process.</p> <p>(3) Nothing in this section detracts from the obligations imposed by section 80.50.</p>	<p>Enova has a number of ways to receive and respond to feedback including:</p> <p>Enova’s corporate website, social media, email, phone, in-person, and in writing.</p> <p>If another method is requested, we will provide and accommodate upon request.</p>	Completed	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request, provide or arrange for the provision of accessible formats and communication support for persons with disabilities, a) in a timely manner that takes into account the person’s disabilities; and b) At a cost that is no more than the regular cost charged to other persons.	Supports are in place to provide accessible formats and communication support in a timely manner.  No additional costs charged for alternate formats.	<b>Ongoing</b>  <b>(will provide upon request)</b>	January 1, 2024
		12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Enova will consult with each person making the request to determine the most suitable accessible format(s) and communications support(s).	<b>Ongoing</b>	January 1, 2024
		12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Accessible formats and communications support options will be posted on Enova’s corporate website by Enova’s Communications team.	<b>Ongoing</b>	January 1, 2024
13	Emergency Procedures, Plans, Public Safety Information	13. (1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Enova has some public safety information and resources available on our corporate website for public viewing. Alternative formats will be provided upon request.  Enova has internal Emergency Response Plans only available for employees on the corporate intranet, not available for public view.	<b>Completed</b>	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
14	Accessible Websites & Web Content	<p>14. (2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the 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> <p>January 1, 2021 – All internet websites and web content must conform with WCAG 2.0 Level AA other than:</p> <ul style="list-style-type: none"> <li>- Success criteria 1.2.4 Captions (Live).</li> <li>- Success criteria 1.2.5 Audit descriptions (pre-recorded).</li> </ul>	<p>Enova website conforms to WCAG 2.0 Level AA</p> <p>Enova will continue to train employees responsible for website updates to conform to current standards.</p>	<b>Completed</b>	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
<b>Part III – Employment Standards</b>					
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes	The following is posted to the Enova Careers webpage: “If you are selected to participate in the recruitment process for the position to which you have applied and require a disability-related accommodation, please notify the People and Culture Department.” Accommodations are available for all parts of the recruitment and selection process. Applicants need to make their required accommodation known in advance.	<b>Completed</b>	January 1, 2024
23	Recruitment Assessment or Selection Process	23. (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. 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.	Enova notifies every applicant selected for a job interview that we are AODA compliant and are asked to advise us in advance of any accommodation required.  This information is also posted on individual job opportunities on the Enova Corporate webpage.	<b>Completed</b>	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
24	Notice to successful applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its process for accommodating employees with disabilities.	Enova’s current job offer letter template for successful applicants provides this notice.	<b>Completed</b>	January 1, 2024
25	Informing Employees of Supports	25. (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.	All employees will be trained on such policies during their orientation.  Employees will be able to access these policies on the corporate intranet.	<b>Completed</b>	January 1, 2024
		25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	New employees will receive training during orientation.  Integrated into health & safety orientation training.	<b>Ongoing</b>	January 1, 2024
		25. (3) Employers shall provide 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.	When such policies are changed, all employees are to review and acknowledge they have read and understand the document. Policy updates will be communicated to employees on their emails and/or the corporate intranet.	<b>Completed</b>	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
26	Accessible formats and communication supports for employees.	26.(1) In addition to its obligations under section 12, where an employee with a disability requests accommodation, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for a) information that is needed in order to perform the employee’s job; b) Information that is generally available to employees in the workplace.	Will provide or arrange to provide accessible formats and communication support to employees who request it.	<b>Completed</b>	January 1, 2024
		26. (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Enova will consult with the employee(s) to determine a suitable format or communication support upon request.	<b>Completed</b>	January 1, 2024
27	Workplace Emergency Response Information	27. (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.	Enova will develop an individual emergency plan that considers various emergencies when made aware of a disability.  Individualized Emergency Response template will be made available on the corporate intranet.	<b>Completed</b>	January 1, 2024



Section	Initiative	Description	Action	Status	Compliance Date
		(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 response information to the person designated by the employer to provide assistance to the employees.	Will provide Emergency Response to the person designated to aid, with the employee’s consent. Employees will also be canvased and provided this information yearly.	<b>Completed</b>	January 1, 2024
		(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.	Provide Individual Response Information promptly, once Enova is made aware of a disability.	<b>Completed</b>	January 1, 2024
		(4) Every employer shall review the individualized workplace emergency response information a) When the employee moves to a different location in the organization; b) When the employee’s overall accommodations needs or plans are reviewed; and c) When the employer reviews its general emergency response policies.	Review Individual Emergency Plans as required.	<b>Completed</b>	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
28	Documented Individual Accommodation Plans	<p>28. (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.</p> <p>28. (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, such as a doctor or a nurse, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>4. The manner in which the</li> </ol>	<p>Enova's Accessibility Policy outlines the steps for developing Individual Accommodation Plans.</p> <p>Enova will include all legislative criteria when completing the policy.</p>	In Progress	January 1, 2024

		<p>employee can request the participation of a representative from the 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.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which 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 the account the employee's accessibility needs due to disability</p>			
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Section	Initiative	Description	Action	Status	Compliance Date
29	Return to Work Process	29. (1) Every employer, other than an employer that is a small organization, a) Shall develop and have in place a 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; and b) Shall document the process.	Enova will develop a Return to Work policy and procedure to manage accommodations.	<b>Completed</b>	February 1, 2024
		29. (2) The return to work process shall, a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; b) Use individual documented accommodation plans, as described in section 28 as part of the process.	Policy and procedure will take into account AODA requirements.	<b>Completed</b>	February 1, 2024
		29. (3) The 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.	Enova’s return to work process will not replace or override any other return to work process created by or under any other statute.	<b>Ongoing</b>	

Section	Initiative	Description	Action	Status	Compliance Date
30	Performance Management	30. (1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities , as well as individual accommodation plans, when using its performance management process in respect to employees with disabilities.	<p>Performance Management will take accessibility needs into account.</p> <p>All supervisors are given this information during Accessibility training.</p> <p>New employees will be advised during Accessibility training.</p>	Completed	January 1, 2024
31	Career Development & Advancement	31. (1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when providing career development and advancement to its employees with disabilities.	<p>All supervisors receive this information during Accessibility Training.</p> <p>New employees are advised during accessibility training.</p>	<p>Completed</p> <p>Ongoing (as new employees are hired)</p>	January 1, 2024
32	Redeployment	32. (2) An employer that uses redeployment shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with Disabilities.	Part of Enova’s current process.	Completed	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
<b>Part IV.I – Design of Public Spaces Standards</b>					
80.34	Accessible Parking	Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part.	No further action needed.	<b>Completed</b>	January 1, 2024
80.41	Service Counters	<p>(1) When constructing new service counters, which includes replacing existing service counters, the following requirements must be met:</p> <ol style="list-style-type: none"> <li>1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters.</li> <li>2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters.</li> </ol> <p>(2) The service counter that accommodates mobility aids must meet the following requirements:</p> <ol style="list-style-type: none"> <li>1. The countertop height must be such that it is usable by a person seated in a mobility aid.</li> </ol>	Enova’s service counters are compliant with these accommodations.	<b>Completed</b>	January 1, 2024

		<p>2. There must be sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required.</p> <p>3. The floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid.</p>			
<b>80.43</b>	Waiting Areas	<p>(1) When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, and a minimum of three per cent of the new seating must be accessible, but in no case shall there be less than one accessible seating space.</p> <p>(2) For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait.</p>	No further action needed.	<b>Completed</b>	January 1, 2024
<b>80.44</b>	Maintenance of Accessible Elements	<p>In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following:</p> <p>1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.</p> <p>2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.</p>	Enova has developed procedures for dealing with temporary disruptions when accessible elements under public spaces are not in working order.	<b>Completed</b>	January 1, 2024

Section	Initiative	Description	Action	Status	Compliance Date
<b>Part IV.II – Customer Service Standards</b>					
80.44	Establishment of Policies	<p>(1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.</p> <p>(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <p>1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.</p> <p>2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.</p> <p>3. Persons with disabilities must be given an opportunity equal to that</p>	<p>Enova’s will ensure that all policies respect the dignity and independence of persons with disabilities, and give those with disabilities the opportunity to acquire Enova’s goods, facilities, and services.</p> <p>When communicating with a person with a disability, Enova shall do so in a manner that takes into account the person’s disability, and utilize communication supports as needed.</p>	Ongoing	January 1, 2024



		<p>given to others to obtain, use and benefit from the goods, services or facilities.</p> <p>4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person’s disability.</p>			
80.47	Use Of Service Animals And Support Person	<p>This section applies if goods, services or facilities are provided to members of the public or other third parties at premises owned or operated by the provider and if the public or third parties have access to the premises.</p> <ol style="list-style-type: none"> <li>1. If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.</li> <li>2. If a person with a disability is accompanied by a support person, the provider shall 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</li> </ol>	<p>Service animals and support persons are permitted in the customer service areas of Enova offices.</p> <p>Enova provides this information on the corporate website.</p>	<b>Completed</b>	January 1, 2024

		<p>person while on the premises.</p> <p>3. Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request.</p> <p>4. The notice required by subsection (9) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider’s website, if any, or by such other method as is reasonable in the circumstances.</p>			
80.48	Notice of Temporary Disruptions	<p>(1) If, in order to obtain, use or benefit from a provider’s goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.</p> <p>(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p>	Enova will give notice of temporary disruptions on the corporate website, or in any other method that is reasonable given the circumstances.	<b>Completed</b>	January 1, 2024

		<p>(3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.</p> <p>(4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request.</p> <p>(5) The notices required by subsections (2) and (4) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.</p>			
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Section	Initiative	Description	Action	Status	Compliance Date
80.49	Training for Staff	<p>In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider’s goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> <li>1. Every person who is an employee of, or a volunteer with, the provider.</li> <li>2. Every person who participates in developing the provider’s policies.</li> <li>3. Every other person who provides goods, services or facilities on behalf of the provider.</li> </ol> <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none"> <li>1. How to interact and communicate with persons with various types of disability.</li> <li>2. 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.</li> </ol>	<p>Enova will train all employees, volunteers, participants in our policies will be trained on how to interact and communicate with those with disabilities and/or assistive devices, and assist them with providing them with goods, services, or facilities that Enova provides.</p> <p>Training will be complete for these individuals as soon as practicable.</p>	Completed	January 1, 2024

		<p>3. 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.</p> <p>4. What to do if a person with a particular type of disability is having difficulty accessing the provider’s goods, services or facilities.</p> <p>(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p>			
<b>80.50</b>	Feedback Process Required	<p>Every provider shall establish a process for receiving and responding to,</p> <p>(a) Feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and</p> <p>(b) Feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).</p>	<p>Enova has a number of ways to receive and respond to feedback including:</p> <p>Enova’s corporate website, social media, email, phone, in-person, and in writing.</p> <p>If another method is requested, we will provide and accommodate upon request.</p>	<b>Completed</b>	January 1, 2024
<b>80.51</b>	Format of Documents	<p>If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an</p>	<p>Supports are in place to provide accessible formats and communication support in a timely manner.</p> <p>No additional costs charged for alternate formats.</p>	<b>Ongoing</b>  <b>(will provide upon request)</b>	January 1, 2024

		<p>accessible format or with communication support,</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> <p>(2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>			
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