



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES POLICY

DATE: 01-Jan-2021
VERSION: 2
REVISED: 12-May-2026

1. PURPOSE

Not all disabilities are visible and it is not always possible to determine who has a disability. Disabilities may include physical limitations and mental health, cognitive or intellectual development, learning, hearing, or vision disabilities. The employees of Elgin Construction Company Limited will never make assumptions about what a person can and cannot do because of a disability. We are committed to making all persons feel welcome and included at all times.

Elgin Construction Company Limited is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Elgin Construction Company Limited understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Elgin Construction Company Limited is committed to complying with both the Ontario Human Rights Code and the AODA.

Employee accommodations are available, upon request, to support their continued success and well-being. Together, Elgin Construction Company Limited and the employee with a disability will work together to figure out an accommodation that will address a particular issue. Any request for accommodation should be directed to the President or Vice-President. For more information, please see the Elgin Construction Company Limited Health & Safety Policy, Section 16.01

2. CUSTOMER SERVICE & COMMUNICATION

Elgin Construction Company Limited is committed to excellence in serving all customers including people with disabilities.

Our accessible customer service policy is consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities. Our Policy is available upon request and a notice is posted on our bulletin board.



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www.elginconstruction.net

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We are committed to engaging with our customers or visitors to our office in such a way that accommodates the communication and access needs of persons with disabilities. This includes providing for the use of assistive devices, service animals and support personnel. We will communicate with people with disabilities in ways that take into account their disability. We will consult with the person with a disability to determine what method of communication works best for them.

3. CUSTOMER'S OWN ASSISTIVE DEVICE(S)

People with disabilities may use their own personal assistive devices when accessing our facility.

Although at this time we do not expect a circumstance where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, if a case does arise other measures will be used to ensure the person with a disability can access our services or facility. Where a person requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Elgin Construction Company Limited will identify a list of possible assistive devices to expect to all employees.

4. SERVICE ANIMALS

We welcome people with disabilities and their service animals. Unless service animals are prohibited by another law, service animals are allowed on the parts of our premises that are open to the public.

When we cannot easily identify that an animal is a service animal (e.g. no harness or vest or other visible indicator), our staff may ask a person to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.



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While visiting our office, it will be the responsibility of the person with a service animal to control the animal at all times.

5. SUPPORT PERSONS

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premise.

In situations where confidential information may be discussed, consent will be obtained from the person with the disability prior to any such conversation. Elgin Construction Company Limited will make every reasonable effort to accommodate such conversations in a separate office space.

6. RECRUITMENT PROCESS

Elgin Construction Company Limited welcomes and encourages applications from people with disabilities. Accommodations are available on request for candidates taking part in all aspects of the selection process to enable all persons to participate equally in the hiring process and our workplace, except in circumstances that create undue hardship.

7. NOTICE OF TEMPORARY DISRUPTION

Elgin Construction Company Limited will make reasonable efforts to provide all persons affected with notice in the event of any disruption in the services or facilities regularly used by the public and by persons with disabilities at our office location. In some circumstances such as the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Services or facilities that are disrupted or unavailable
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- Reason for the disruption
 - Anticipated duration
 - A description of alternatives, if any during the disruption
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8. TRAINING

Elgin Construction Company Limited will provide accessible customer service training to:

- all employees
- anyone involved in developing our policies
- anyone who provides goods, services or facilities to customers on our behalf
- Staff will be trained on accessible customer service as soon as practicable after being hired

Training will include:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- Elgin Construction Company Limited's policies related to 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 Elgin Construction Company Limited's goods, services or facilities

Elgin Construction Company Limited has incorporated this training requirement into its hiring practices to ensure that employees complete the required training within a reasonable time of having accepted employment with our organization. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided. Staff will also be trained when changes are made to our accessible customer service policies.



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9. WORKPLACE EMERGENCY RESPONSE INFORMATION

At Elgin Construction Company Limited, we take the safety of our employees seriously. If an employee has a disability which they believe may require an individual emergency response plan, you must first self-identify to Management. If an employee has a disability that may affect their ability to evacuate safely during an emergency, we will consult with you to develop a personalized emergency response plan.

10. FEEDBACK PROCESS

Elgin Construction Company Limited welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Customers who wish to provide feedback on the way Elgin Construction Company Limited provides services or facilities to people with disabilities can provide feedback in the following way(s):

Telephone:

(519)-631-5041

Ask to speak with the President or Vice-President.

E-Mail:

anikli@elginconstruction.net

In writing:

Elgin Construction Company Limited, 140 Burwell Road, St. Thomas, ON, N5P 3R8
Attention, President

Elgin Construction Company Limited will make every reasonable effort to respond to customers' feedback in seven days. If for some reason, this timing is not feasible, Elgin Construction Company Limited will notify the customer of the revised timing.

Elgin Construction Company Limited, upon request, will provide alternate formats to receive and respond to feedback in a way that is accessible to people with disabilities. If we are unable to meet



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a request for a specific alternate accessible format, we will explain why and aim to identify another format that may work in its place.