

Accessibility Policy and Multi-Year Plan

General Purpose

The Accessibility for Ontarians with Disabilities Act, 2005 ("the AODA") is a Provincial Act with the purpose of developing, implementing and mandating accessibility standards in order to achieve accessibility for persons with disabilities, with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Accessibility Policy

Our policy has been established in compliance with Regulation 191/11, "Integrated Accessibility Standards" (Regulations) under the Accessibility for Ontarians with Disabilities Act, 2005. These standards have been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications, employment, transportation, design of public spaces, and customer service. Primo Mechanical is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities.

Statement of Commitment

Primo Mechanical is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We are committed in ensuring that persons with disabilities receive the same quality of service that others receive.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws and the Accessibility for Ontarians with Disabilities Act.

Primo Mechanical is committed to meeting its current and ongoing obligations under the Human Rights Code respecting non-discrimination.

Primo Mechanical 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.

As part of Primo Mechanical commitment to meeting its obligations under the Act, Primo Mechanical has developed a multi-year plan which outlines Primo Mechanical's strategy to prevent and remove barriers and meet its requirements under the AODA and IASR.

Primo Mechanical Multi-Year Accessibility Plan will be reviewed and updated by Primo Mechanical management at least once every five (5) years, and as required. It will also be provided in an accessible format upon request.

Training

Primo Mechanical will provide training on the requirements of the IASR and on disability-related obligations under Ontario Human Rights legislation to all employees, contractors, and any others who may be acting on Primo Mechanical's behalf in dealing with the public or any other third parties.

Training of our employees and volunteers on accessibility relates to their specific roles. It includes:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- Our policies related to the Customer Service Standards
- 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
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.
- What to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

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.

Customer Service Standards

Provisions of Good and Services to Persons with Disabilities

Primo Mechanical will make every reasonable effort to:

- 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 as long as this does not present a 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;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services, or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities.

We ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services, or facilities.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, Primo Mechanical will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

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In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Primo Mechanical. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Primo Mechanical's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in 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:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption; • Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur, Primo Mechanical will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Primo Mechanical website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Procurement or Acquiring Good and Services or Facilities

We incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service facilities. If it is not possible and practical to do so, we will provide an explanation upon request.

Feedback

Primo Mechanical values everyone's feedback. Primo Mechanical will ensure that customer service expectations are being met and that all customers, regardless of any disability, receive fair and equal treatment. All feedback will receive a receipt of feedback acknowledgement. Action will occur within 21 days of receipt.

Customers, clients, employees, and contractors are welcome to submit comments via way of email (v.agozzino@primomechanical.com)

By way of telephone: (905-851-6718 ext. 237)

In person/ Mail: (15-253 Jevlan Drive, Woodbridge, Ontario, L4L 7Z6)

Information and Communication Standards

Accessible Formats and Communication Supports

Primo Mechanical will provide appropriate information and communications in an accessible manner to people with disabilities upon request. Primo Mechanical will consult with the person to determine their accessibility needs. Primo Mechanical is committed to providing the alternate format in a timely manner and in a

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conspicuous place owned and operated by Primo Mechanical, Primo Mechanical website and / or any other reasonable methods. This includes, but are not limited to:

- Enlarged text;
- Braille format;
- Communication support either in person or over the phone;
- Documents provided via email.

Accessible Websites and Web Content

Primo Mechanical will ensure that new Internet websites and new web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 – Level A. All websites and web content will conform to WCAG – Level AA and will refer to the legislation for specific compliance deadlines and requirements.

Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Employment Standard

All employment services provided by Primo Mechanical follow the principles of dignity, independence, integration, and equal opportunity.

Recruitment

Primo Mechanical will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

Recruitment, Assessment or Selection Process

Primo Mechanical will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests accommodation, Primo Mechanical will consult with the applicant and provide, or arrange for the provision of, suitable accommodation in a manner that takes into account the applicant's accessibility needs.

Notice to Successful Applicants

When making offers of employment, Primo Mechanical will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

Primo Mechanical will inform all employees, both new and existing, of the accessible employment practices. This includes, but is not limited to, policies on providing job accommodations that take into account an individual employee's accessibility needs due to disability. This will make all employees aware of how the organization will support them if they have a disability – or if they acquire a disability later in their career.

Accessible Formats and Communication Supports for Employees

Upon request, whenever possible, Primo Mechanical will consult with the person to determine the best method of providing the information requested and take the necessary steps to provide accessible formats

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and communications for the following:

1. Information needed in order to perform their job; and
2. General information that is made available to all employees in the workplace.

Workplace Emergency Response Information

Primo Mechanical will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Primo Mechanical is aware of the need for accommodation due to the employee's disability. Primo Mechanical will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Primo Mechanical will, with the consent of the employee, provide the workplace emergency response information to the person designated by Primo Mechanical to provide assistance to the employee.

Primo Mechanical will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations, needs or plans are reviewed.

Documented Individual Accommodation Plans

Primo Mechanical will take the following steps to develop and put in place a process for developing documented Individual Accommodation Plans (IAP) and processes for employees that have been absent due to a disability:

Develop an Individual Accommodation Plan (IAP) that includes 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;
- Primo Mechanical Masonry may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- 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.

Return to Work

Primo Mechanical will develop a process that supports employees who have been absent due to a disability and who require related accommodations when they return to work.

The return-to-work process will:

- Be documented and outline the steps that will be taken to facilitate an employee's return to work.
- Use documented individual accommodation plans.

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The return-to-work process will not replace or override any other return to work processes created under any other law.

Performance Management, Career Development and Advancement and Redeployment

Primo Mechanical will develop processes that take into account the accessibility needs of employees with disabilities and their individual accommodation plans.

Primo Mechanical will review an employee’s accommodation plan to understand the individual’s accommodation needs and determine if the plan needs adjusting to improve his or her performance on the job.

Primo Mechanical will adjust the accommodation supports or update an accommodation plan, with the employee’s participation, to meet the employee’s new role or responsibilities in the event the employee is promoted or redeployed.

Changes to Existing Policies

This policy will be reviewed regularly to ensure that it is reflective of Primo Mechanical’s current practices and legislative requirements.

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.

Document Revision Log					
Rev. #:	Revised By:	Changes Made:	Date:	Reviewed and Approved By:	Date:

Multi-Year Accessibility Plan

Intent

This 2024 to 2029 accessibility plan outlines the policies and actions that Primo Mechanical will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the Integrated Accessibility Standards, Ontario Regulation 191/11.

Plan

General Requirements			
Accessibility Requirement:	Establishment of accessibility policies	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	Write and publish accessibility policies		
Potential Future Barriers:	Ongoing updates, as required		
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Accessibility Requirement:	Training on IASR and the <i>Human Rights Code</i>	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	Establish and conduct training to all employees		
Potential Future Barriers:	Ongoing updates and training of new employees as required		
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Information and Communications Standard			
Accessibility Requirement:	Accessible formats and communication supports	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	Ensure Primo Mechanical provides or arranges for the provision of accessible formats and communication supports, when requested.		
Potential Future Barriers:			
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Accessibility Requirement:	Accessible websites and web content	Compliance Deadline:	Jan. 1, 2025

Current Barriers:			
Plan to Meet Requirements:	New website was built with AODA web accessibility standards in mind.		
Potential Future Barriers:	Ensure new technology and website updates comply.		
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Employment Standard			
Accessibility Requirement:	Recruitment, assessment and selection processes	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	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, Primo Mechanical will consult with the applicant and provide or arrange for suitable accommodation.		
Potential Future Barriers:			
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Accessibility Requirement:	Informing employees of supports	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	Primo Mechanical will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Accessibility Requirement:	Accessible formats and communication supports for employees	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	<p>If an employee with a disability requests it, Primo Mechanical will provide or arrange for the provision of accessible formats and communication supports for the following:</p> <ul style="list-style-type: none"> • Information needed in order to perform his/her job; and 		

	<ul style="list-style-type: none"> Information that is generally available to all employees in the workplace. 		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Accessibility Requirement:	Workplace emergency response information	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	Where required, Primo Mechanical will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Accessibility Requirement:	Documented individual accommodation plans	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	Primo Mechanical will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Vanessa Agozzino	Results:	Completed
Accessibility Requirement:	Return to work process	Compliance Deadline:	Jan. 1, 2025
Current Barriers:	None		
Plan to Meet Requirements:	Primo Mechanical will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.		
Potential Future Barriers:	Ongoing training for all new employees.		

Responsible Authority:	Vanessa Agozzino	Results:	Completed	
Accessibility Requirement:	Performance management process	Compliance Deadline:	Jan. 1, 2025	
Current Barriers:	None			
Plan to Meet Requirements:	Primo Mechanical will consider the accessibility needs of employees with disabilities when implementing performance management processes.			
Potential Future Barriers:	Ongoing training for all new employees.			
Responsible Authority:	Vanessa Agozzino	Results:	Completed	
Accessibility Requirement:	Career development and advancement	Compliance Deadline:	Jan. 1, 2025	
Current Barriers:	None			
Plan to Meet Requirements:	Primo Mechanical will consider the accessibility needs of employees with disabilities when offering career development or advancement opportunities.			
Potential Future Barriers:	Ongoing training for all new employees.			
Responsible Authority:	Vanessa Agozzino	Results:	Completed	
Accessibility Requirement:	Redeployment	Compliance Deadline:	Jan. 1, 2025	
Current Barriers:	None			
Plan to Meet Requirements:	Primo Mechanical will ensure the accessibility needs of employees with disabilities will be taken into account in the event of redeployment.			
Potential Future Barriers:	Ongoing training for all new employees.			
Responsible Authority:	Vanessa Agozzino	Results:	Completed	