

## ACCESSIBILITY POLICY

This Policy and Multi-Year Accessibility Plan (the “Policy and Plan”) outlines the plans and actions that Broccolini will put in place in Ontario to ensure accessibility for persons with disabilities.

This Policy and Plan will be updated on an ongoing basis as necessary, and at least once every five years. Accessible format or communication support requests relating to this Policy and Plan are accepted in the format most convenient to the requesting person and should be directed to Human Resources at [hr@broccolini.com](mailto:hr@broccolini.com).

### 1.0 Definition

The definition of disability under the AODA is the same as the definition under the Ontario Human Rights Code.

“Disability” means

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impairment, deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”)

### 2.0 Our Commitment

Broccolini 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 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, including the *Accessibility for Ontarians with Disabilities Act*, 2005 and its regulations (collectively, the “AODA”).

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

Broccolini understands that obligations under the 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.

Broccolini is committed to excellence in serving and providing goods, services and facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

More specifically, Broccolini is committed to:

- Training all employees, volunteers, all persons who participate in developing AODA policies, and all persons who provide goods, services or facilities on Broccolini's behalf in accessible customer service, other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.
- Excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

<ul style="list-style-type: none"><li>○ Assistive devices</li><li>○ Communication</li><li>○ Telephone services</li><li>○ Billing</li></ul>	<ul style="list-style-type: none"><li>○ Service Animals</li><li>○ Support persons</li><li>○ Design of public spaces</li></ul>
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- Notifying customers promptly in the event of a planned or unexpected disruption to services or facilities for customers with disabilities.
- Welcoming feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.
- Having a process for receiving and responding to feedback which is accessible to persons with disabilities upon request.
- Consulting with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability.
- Providing customized emergency information to help an employee with a disability during an emergency.
- Ensuring Broccolini is in compliance with the Integrated Accessibility Standards Regulation, including the development and implementation of a multi-year plan addressing how our company intends to continually improve in providing equal access and participation for people with disabilities.

This Policy and Plan address the requirements of the Integrated Accessibility Standards Regulation (O. Reg. 191/11), including the Information and Communications, Employment, and Design of Public Spaces Standards.

### **3.0 Training**

We are committed to training all employees, volunteers, all persons who participate in developing AODA policies, and all persons who provide goods, services or facilities on Broccolini's behalf in accessible customer service, other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

Training includes:

- The purpose of the AODA 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.

Training will be provided in a way that best suits the duties and responsibilities of those being trained and will be delivered as soon as is practicable after being hired and in the event of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the names of those to whom it was provided.

## **4.0 Providing Goods, Services or Facilities to people with Disabilities**

Broccolini is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas.

### 4.1 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 and 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.

### 4.2 Communication

We will communicate with people with disabilities in ways that take into account their disability.

We will work with the person with disabilities to determine what method of communication works best for them.

### 4.3 Telephone Services

We are committed to providing fully accessible telephone service to our customers. We will train staff and volunteers to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by email if telephone communication is not suitable to their communication needs or is not available.

### 4.4 Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in a legible format that best suits the customer's requirements. Examples of invoices to accommodate with a disability include larger font or larger font size.

We will answer any questions customers may have about the content of the invoice in person, by telephone, or by email.

### 4.5 Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When we cannot easily identify that an animal is a service animal, our employees may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- Explain why the animal is excluded
- Discuss with the customer another way of providing goods, services or facilities

## 4.6 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 premises.

In certain cases, Broccolini might require a person with a disability to be accompanied by a support person for the health and safety reasons of the person with a disability. This may be the case on Broccolini's active construction sites. Before making a decision, Broccolini will:

- Consult with the person with a disability to understand their needs
- Consider health or safety reasons based on available evidence
- Determine if there is no other reasonable way to protect the health or safety of the person

## 4.7 Design of Public Spaces

We will meet the accessibility laws when building or making major changes to public spaces. Any Broccolini space that is open to the public, e.g., the reception area (a service counter) will meet the requirements for accessibility. We have procedures in place to prevent service disruptions to the accessible parts of our public spaces.

## 4.8 Transportation

Broccolini does not provide public or specialized transportation services as defined under the IASR; therefore, the Transportation Standard does not apply.

## **5.0 Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and service counters on our premises.

## **6.0 Feedback Process**

Broccolini's goal is to meet and, where possible, surpass customer expectations while serving customers with disabilities. Broccolini welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback regarding how Broccolini provides goods and services to people with disabilities, and on our feedback process itself, can be made by email to Salujah Chandran, People & Culture Manager at [salujah.chandran@broccolini.com](mailto:salujah.chandran@broccolini.com) or by telephone at 416.388.9367.

All feedback, including complaints will be directed to the relevant department head and reviewed accordingly. Customers can expect to hear back in 10 days. Feedback will be responded to in a format that takes into account the individual's accessibility needs, including accessible digital formats or communication supports, as requested.

Broccolini ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports upon request.

## 7.0 Information and Communications

We have a process for receiving and responding to feedback, and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety and emergency-related information, in accessible formats or with communication supports in a timely manner, taking into account the person's accessibility needs due to disability.

We will consult with the person making the request in determining the suitability of an accessible format or communication support.

## 8.0 Employment

We notify employees, job applicants, and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify employees that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible form or communication supports specifically for:

- information that is needed in order to perform the employee's job; and
- information that is generally available to employees in the workplace.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

### 8.1 Emergency Response Plans

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We 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; and
- when the employee reviews its general emergency response policies.

### 8.2 Accommodation Plans

We have a written process to develop individual accommodation plans for employees, and for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

## **9.0 Changes to Existing Policies**

Broccolini is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

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.

## **10.0 Questions**

If anyone has a question about this policy, or if the purpose of this policy is not understood, an explanation should be provided by a member from People & Culture ([hr@broccolini.com](mailto:hr@broccolini.com)).

## MULTI-YEAR ACCESSIBILITY PLAN (2026 – 2031)

**Effective Date:** January 2026

**Review Cycle:** At least once every five (5) years, or earlier as required

### 1. Commitment to Accessibility

Broccolini Construction (Toronto) Inc (“Broccolini”) is committed to meet the needs of its employees and customers with disabilities and is continuously working hard to remove and prevent barriers to accessibility. We believe in integration and equal opportunity and are committed to meeting the needs of people with disabilities in a timely manner.

Broccolini is committed to fulfilling our requirements under the AODA. This Multi-Year Accessibility Plan outlines the steps Broccolini is taking to prevent and remove barriers to accessibility and to meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (IASR).

This plan applies to all Broccolini operations in Ontario.

### 2. Accessibility Plan

Broccolini’s Multi-Year plan achieves the following:

- Identifies achievements over the years to remove barriers to people with disabilities
- Sets our strategies and actions to address accessibility requirements
- Documents how Broccolini will maintain accessible elements and respond to disruptions
- Demonstrates compliance with applicable AODA standards
- The communication and availability of this accessibility plan

### 3. Past Achievements to Remove and Prevent Barriers

#### Training

Broccolini has designed and implemented a training program for all employees and volunteers with a focus on excellence in serving all customers including people with disabilities. Every employee or volunteer is provided with training as soon as practicable after being hired and will be provided with training in respect of any changes to the policies.

#### Accessibility Policy

Broccolini has created and implemented an Accessibility Policy which meets the requirements of the AODA. This policy is available to all employees through our internal corporate site and is available in accessible formats upon request.

#### Create a Multi-Year Plan

Broccolini has established and implemented and will maintain a Multi-Year Plan which details the company’s strategies to prevent and remove barriers for people with disabilities.

## Customer Service

Broccolini has published and distributed an Accessibility Policy with a focus on excellence in serving all customers including people with disabilities. Broccolini has reviewed its customer facing processes to ensure goods, services and facilities can be accessible to people with disabilities when requested.

## Employment

Broccolini's Accessibility policies have been communicated to job seekers and hired candidates through public job postings and the recruitment and onboarding processes. Upon request, emergency and public safety information will be provided in accessible formats, considering the person's accessibility needs. Communication supports will also be provided.

## Design of Public Spaces

Broccolini renovated their Toronto office space with a reception area which meets accessibility standards. The office's service counter is accessible to people who use mobility aids.

## **4. Accessibility Policies**

Broccolini maintains written accessibility policies that govern how we achieve accessibility across customer service, employment, information and communications, and the built environment.

The accessibility Policy and the Multi-Year Accessibility Plan are:

- Reviewed regularly
- Updated as required to meet requirements and standards
- Available in accessible formats upon request
- Publicly posted on the Broccolini Website

## **5. Strategies and Actions**

Area	Action	Timing
Website	Accessibility review during major updates	Ongoing / at redesign
Training	Refresher training upon policy changes	As required
Employment	Accessible employment practices	Ongoing
Public Spaces	Accessibility review when renovating	Project based

## Website Accessibility

Broccolini is committed to making our information and communications accessible to people with disabilities. Our website conforms to World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, as required under the IASR.

The Broccolini Website accessibility will be reviewed during updates and redesign. Accessible format and communication supports are provided upon request.

## **Training**

Broccolini is committed to providing training to all employees, volunteers, individuals involved in developing accessibility policies and training for individuals providing goods, services, or facilities on Broccolini's behalf.

Our training included:

- AODA requirements
- Customer Service Standard
- Human Rights Code obligations related to disability
- How to interact with people with disabilities
- Use of assistive devices, service animals and support persons.

Training is provided as soon as practicable after hire. Broccolini is committed to providing refresher training when policies change. Proof of training records is maintained via a learning management system.

Should there be a substantive change to accessibility policies, Broccolini is committed to updating the training program and re-training employees and volunteers, and all others who would be deemed necessary to receive this training.

## **Employment**

Broccolini is committed to fair and accessible employment practices.

This will be achieved by:

- Reviewing on an ongoing basis, Human Resources policies, practices and procedures to ensure accessibility to persons with disabilities throughout the employment process, including recruitment, retention, career development and return to work
- Notifying candidates who have been invited to participate in the recruitment process that, where needed, accommodations for disabilities are available, upon request, to support their participation in the process
- Informing employees of Broccolini's policies for supporting employees with disabilities and that individual accommodations plans shall be created upon request.
- Documented process for supporting employees who return to work after being away for reasons related to a disability
- Reviewing the accessibility needs of employees with disabilities during the performance management process (formal reviews) and during career development and advancement opportunities
- Creation of individualized workplace emergency response information where required.

## **Design of Public Spaces**

Broccolini will meet the accessibility requirement under the Design of Public Spaces Standard when constructing or making major modifications to public spaces, including service counters, accessible paths of travel, public entrances and waiting areas.

This will be achieved by:

- Consider and incorporate accessibility design when beginning the redesign of public spaces
- Ensuring experts are consulted for design features in the planning process. Broccolini will also leverage our Joint Health and Safety Committee for their comments and feedback on accessible design features.
- Continuously striving to research methods to make necessary accessibility upgrades. We are committed to identifying opportunities to improve accessibility.

## **Maintenance of Accessible Elements and Temporary Disruption**

Broccolini is committed to ensuring that accessible elements in public and workplace spaces are maintained in good working order. This will be achieved by the following strategies:

- a. Preventative Maintenance
  - Accessible elements (such as entrances, doorways, washrooms, parking areas, signage and paths of travel) are subject to regular inspection and maintenance through established facilities and site management processes.
- b. Emergency Maintenance
  - Where an accessible element is unexpectedly unavailable due to damage or malfunction, Broccolini will take reasonable steps to address the issue in a timely manner.
- c. Temporary Disruption
  - In the event of a temporary disruption to accessible elements:
    - o Broccolini will provide notice using appropriate methods (on-site signage, electronic communication)
    - o The notice will include the reason for the disruption along with the anticipated duration
    - o Broccolini will ensure alternative arrangements or assistance will be offered where reasonably possible

This commitment is reviewed as part of Broccolini's ongoing accessibility planning.

## **Compliance Reporting**

Broccolini will file compliance reports with the Ontario government as requested and in advance of the next available deadline. Broccolini is committed to reviewing the Multi-Year plan at least once every five (5) years and update the plan as accessibility requirements evolve.

## **Availability of the Accessibility Policy, Multi-Year Plan and Feedback**

The Accessibility Policy is currently available to the public via the following methods:

- Website: [www.broccolini.com](http://www.broccolini.com)
- In writing via [hr@broccolini.com](mailto:hr@broccolini.com),
- By phone (416) 388-9367
- In-person by visiting the Broccolini Construction Toronto offices at 2680 Skymark Avenue, Suite 800 in Mississauga, Ontario.

Broccolini will consider feedback from employees, customers, and other stakeholders when reviewing and updating this plan. Broccolini welcomes feedback on the accessibility of its goods, services and facilities. The above methods are available to provide feedback. Broccolini is committed to reviewing feedback and responding in a timely manner.

Accessible formats and communication supports are available upon request.