

Modern Niagara Group Inc. – Accessibility Plan 2021-2026

General

Contact information

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Executive summary

Introduction

Objective: To outline Modern Niagara Group Inc.'s plan for becoming fully accessible under the Accessible Canada Act.

Scope: Addresses policies, measures, and initiatives for persons with disabilities.

Context

Legislation: Compliance with the Accessible Canada Act.

Goal: Remove barriers in the workplace, services, and products.

Key Areas of Focus

1. Built Environment
 - Ramps, elevators, and other physical alterations.
2. Employment
 - Accessible hiring practices and workplace accommodations.
3. Information and Communication Technologies
 - Websites, software, and digital assets to be accessible.
4. Procurement
 - Ensure suppliers comply with accessibility standards.
5. Customer Service
 - Provide training for staff on how to assist customers and co-workers with disabilities.
6. Transportation
 - Accessible commuting solutions for employees.

Implementation Strategy

- Phase 1: Assessment and Evaluation
- Phase 2: Design and Planning
- Phase 3: Implementation
- Phase 4: Monitoring and Feedback

Budget Allocation

- **Estimated Cost:** \$ TBD
- **Funding Sources:** Internal budgets, government grants.

Timelines

- **Full Implementation:** Targeted for Q4 2026.

Monitoring and Compliance

- **Quarterly Reviews:** To assess progress.
- **Compliance Audits:** Annually.

Conclusion

- **Commitment:** Modern Niagara is committed to providing a welcoming, accessible, and inclusive environment that respects the dignity and independence of all people.
- **Importance:** Achieving accessibility is a legal requirement and aligns with our core values.

This plan is a foundational document to guide our journey toward becoming fully accessible and inclusive for all.

Accessibility Statement

Modern Niagara helps build and maintain the spaces where Canadians live, learn, work, and heal by meeting the mechanical, electrical, and building controls and services needs of Canada's infrastructure. We value passion, initiative, determination, professionalism, and teamwork and we are committed to ensuring that our teams have everything they need to succeed. Health and safety are embedded in everything we do, and, as a result, our award-winning safety culture has a record that's well above industry standards.

Accessibility Policy

Modern Niagara is committed to providing a welcoming, accessible, and inclusive environment that is respectful of the dignity and independence of all people. Our policies will support identifying, removing and preventing barriers to individuals with varying abilities that might interfere with their ability to interact in the workplace. This policy outlines measures that Modern Niagara has in place to meet those requirements and to



comply with appropriate provincial and federal legislation to improve opportunities for people with varying abilities.

Purpose

The purpose of this policy is to provide an overview of Modern Niagara's commitment to accessibility and to outline practices and procedures in place with all Modern Niagara locations to help identify and remove barriers that impede those with varying abilities. Modern Niagara shall use every reasonable effort to promptly meet the needs of individuals with differing abilities through implementing this policy. Further, this policy clearly states the obligations and responsibilities required by relevant legislation.

Scope

This policy includes all individuals working for or with Modern Niagara, including employees, potential employees, stakeholders, subcontractors, suppliers, vendors, and clients.

General Principles

People of all abilities have:

- Equitable Access - Modern Niagara is committed to equitable access for all individuals.
- Dignity - All interactions in the workplace should be conducted in a respectful manner that does not diminish the person in any way.
- Independence - Respecting everyone's right to do things for themselves and participating as partners in any accommodation process.
- Integration - Access to the workplace and any communication, service, or program which may require alternative formats and flexible approaches. This means inclusiveness and full participation. This is a fundamental human right.
- Equal Opportunity - To job vacancies and positions and for promotions in the workplace.

Training

Modern Niagara is committed to training staff in accessibility laws, acts and aspects of the Human Rights Code that relate to persons with varying abilities. This policy has been incorporated into Modern Niagara's National Training Standards. Modern Niagara trains our employees on accessibility pertaining to their specific roles, and new hires must review and sign off on all policies.

Procedure to Identify and Remove Barriers:

Modern Niagara ensures that we are identifying and removing barriers to access for people with varying abilities by:

1. Encouraging individuals with varying abilities to use their own personal assistive devices

2. Notifying employees, potential hires and the public that accommodations can be made during recruitment and hiring, or at any other time as appropriate; and that supports are available for those with varying abilities.
3. Implementing a process to develop individual accommodation plans for employees. Where needed, we will also provide customized emergency information to help an employee with varying abilities during an emergency.
4. Considering the accessibility needs of all employees through our performance management, career development and redeployment processes.
5. Communicating with a person with varying abilities in a manner that considers their ability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports. Modern Niagara will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with accessibility laws.

Types of accessible formats may include:

- HTML and Microsoft Word
- braille
- accessible audio formats
- large print
- text transcripts of visual and audio information

Types of communication supports include:

- reading the written information aloud to the person directly
 - exchanging hand-written notes (or providing a note taker or communication assistant)
 - captioning or audio description
 - assistive listening systems
 - augmentative and alternative communication methods and strategies (e.g., the use of letter, word or picture boards, and devices that speak out)
 - sign language interpretation and intervenor services
 - repeating, clarifying or restating information
6. Allowing individuals with varying abilities to bring their guide dog or service animal with them to areas of the premises where they require assistance.
 7. Permitting individuals with varying abilities who use a support person to accompany them and ensuring that a person with varying abilities has access to their support person while on our premises.
 8. Providing notice when facilities or services that people with varying abilities rely on to access our services are temporarily disrupted. This notice will be provided in accessible formats and posted in public.
 9. Providing public notification on all job postings that any necessary accommodations will be made during the application/interviewing process for applicants who may require them.
 10. Making offers of employment which notify the successful applicant of our policies for accommodating employees with varying abilities.
 11. Allocated parking is available at all MN buildings for those with registered parking stickers. Onsite practices will vary but will be assessed and addressed on a case-by-case basis.
 12. Developing documented individual accommodation plans for employees with varying abilities when required. Employees who require accommodations should contact their manager or a representative from People and Culture(P&C) Human Resources or Health and Safety; workplace accommodations can be temporary or permanent.



Examples of workplace accommodations include, but not limited to: modifying job duties, modifying work stations, allowing flexible work schedules, welcoming or providing assistive devices, allowing short- term and long-term leave, providing alternative ways of communicating with the employer and relocation from an area where environmental sensitivity resulting in illness that is medically supported prevents performance of essential duties.

In accordance with these principles and procedures, reasonable accommodation will be made on a case-by-case basis to meet the specific needs of employees and applicants to make Modern Niagara accessible to employees and applicants with varying abilities.

Feedback Process

Modern Niagara People & Culture (P&C) welcomes all feedback, including feedback about the delivery of our services to persons with varying abilities while working with Modern Niagara in any capacity.

Modern Niagara will investigate and respond to all concerns relating to such services in a timely, thorough and objective manner. Clients who wish to provide feedback on the way Modern Niagara provides goods, services or facilities to people with varying abilities can provide feedback by telephone, in person, in writing, in electronic format or through other relevant methods.

- **Phone:** 613-591-7505
- **Email:** accessibility@modernniagara.com
- **Mail:** Human Resources
- Modern Niagara Group
10B Hearst Way
Ottawa, ON K2M 2G8

- 24/7 Anonymous Reporting: www.talktospot.com/modernniagara

You will receive a response from an HR team member within a reasonable timeframe. A copy of this policy will be provided upon request.

Modern Niagara will provide, on request, information in an accessible format or with communication support to people with varying abilities in a manner that considers their abilities.

Accessibility Requirement	Our Plan	Action	Result	Compliance Date
Accessibility	Modern Niagara develops, implements, and maintains policies governing how the organization achieves or will achieve accessibility through meeting its requirements under Ontario's Accessibility for Ontarians with Disabilities Act and the Accessible Canada Act.	Policy and multi-year plan (2021-2026) completed and posted on Modern Niagara's external website and internal SharePoint site.	Completed	Dec 31, 2023
Training	Modern Niagara will ensure that training is provided on the requirements of Ontario's	https://aoda.ca/free-online-training/	In progress	Jan 1, 2024

	<p>Accessibility for Ontarians with Disabilities Act (AODA), Integrated Accessibility Standards Regulation (IASR), and the Human Rights Code regarding persons with disabilities and their job duties. We will maintain written records of this training.</p> <p>(a) all employees, (b) all persons who participate in developing the organization's policies and (c) all other persons who provide goods, services or facilities on behalf of the organization.</p> <p>This training and the required information will be provided to new employees as soon as practicable after they begin employment.</p>	<p>http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda/certificate-version</p> <p>(http://accessforward.ca/)</p> <p>New employees in Ontario complete AODA training as a part of their onboarding and orientation effective January 1, 2024</p> <p>Learning Journeys are provided to understand accessibility in our industry and workplaces starting during Accessibility week May 28 to June 3, 2024</p>		
Customer Service	<p>Following the Accessibility for Ontarians with Disabilities Act (AODA), All individuals working for or with Modern Niagara, including employees, potential employees, stakeholders, subcontractors, suppliers, vendors, and customers shall be served in a way which takes their disabilities into account.</p>	<p>Actions include:</p> <ul style="list-style-type: none"> • communication • assistive devices are welcomed. • documentation (All published documents can be made available in accessible formats) • service animals <ul style="list-style-type: none"> • o accessible parking spots 	In progress	Dec 31, 2026
Feedback	<p>Modern Niagara will regularly encourage and solicit people with disabilities to provide feedback on accessibility and encourage everyone's participation in making Modern Niagara more inclusive.</p>	<p>Modern Niagara People & Culture team welcomes all feedback, including feedback about delivering our services to persons with disabilities while working with Modern Niagara in any capacity.</p> <p>Modern Niagara People & Culture team will promptly, thoroughly, and objectively investigate and respond to all complaints relating to such services. Feedback may be submitted via email at accessibility@modernniagara.com. You will receive a response from a People & Culture team</p>	Completed	June 1, 2023

		<p>member within 24 hours. A copy of this policy will be provided upon request.</p> <p>We also have an anonymous 3rd party reporting tool available at https://talktospot.com/modernniagara</p>		
Information and Communications	<p>Modern Niagara will provide, on request, information in an accessible format or with communication support to people with disabilities in a manner that takes into account their disability.</p>	<p>Actions include</p> <ul style="list-style-type: none"> • Education for employees and Managers on the availability of accessible format and communication supports under AODA. • Educate employees on the process for requesting accessible formats and communication supports. 	In progress	Dec 31, 2026
Accessible Formats and Communication Support for Employees	<p>Modern Niagara seeks to communicate with persons with varying abilities in a manner that considers their ability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication support. Modern Niagara will also meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements following accessibility laws</p>	<p>Types of accessible formats may include:</p> <ul style="list-style-type: none"> • HTML and Microsoft Word • braille • accessible audio formats • large print • text transcripts of visual and audio information. <p>Types of communication supports include:</p> <ul style="list-style-type: none"> • reading the written information aloud to the person directly 	In progress	Dec 31, 2026
Workplace Emergency Response Information	<p>Modern Niagara ensures that all existing and new employees in Ontario who require an individual workplace emergency response plan are provided with a personal plan that considers their disability.</p>	<p>Workplace Emergency Response Plans are developed in consultation with individuals who request them based on their unique abilities.</p>	In progress / Ongoing	Dec 31, 2026
Accommodation	<p>Modern Niagara has developed and has a written process for individual accommodation plans for employees with disabilities.</p>	<p>Reasonable accommodation will be made on a case-by-case basis to meet the specific needs of employees and applicants to make Modern Niagara Accessible.</p>	Completed	Dec 31, 2024
Return to Work due to Disability or Accessibility	<p>Modern Niagara has:</p> <p>(a) A return to work process for its employees who have been</p>	<p>We have a documented, accommodated return-to-work process related to individuals</p>	Completed	Dec 31, 2024

	<p>absent from work due to a disability and require disability-related accommodations to return to work</p> <p>(b) documentation on the return to work process</p> <p>(c) outlined steps that we will take to facilitate the return to work of employees</p> <p>(d) Will continue to update and document the return to work process based on gaps and compliance requirements</p>	<p>who are returning to work due to a disability or accessibility.</p>		
Protection of Information	<p>Under the regulations of the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA), Modern Niagara will comply with legislation in the protection of the personal information of our employees, potential employees, stakeholders, subcontractors, suppliers, vendors, and customers.</p>	<ul style="list-style-type: none"> • Consent for personal information use is part of the employment agreement, limited to P&C and Finance teams during onboarding. • Employee contracts include a confidentiality clause. • Necessary information for employment is collected (contact details, emergency contact, banking details, DOB, SIN#). • Employee data is stored in secure HRIS software, accessible only to those needing it (e.g., payroll and People & Culture teams). • Subcontractor, supplier, and vendor information, including banking details, is protected by contractual agreements and secure passwords for large transactions. • Client service involves collecting only relevant information, accessible only to specific service lines. • Security measures are in place to protect personal information against 	<p>In progress / Ongoing</p>	<p>Dec 31, 2026</p>

		various risks, managed through access rights in software applications.		
Employment and Recruitment	Modern Niagara is committed to hiring and accommodating people with disabilities. Everyone with a disability is unique, with varying challenges, needs, abilities, qualities, and characteristics. Once we are advised of an accommodation request, we will work with the individual to meet their needs.	Best Practices for Recruiting and Hiring: http://www.ohrc.on.ca/en/policy-and-guidelines-racism-and-racial-discrimination/appendix-%E2%80%93-workplace-policies-practices-and-decision-making-processes-and-systemic-discrimination	In progress	Dec 31, 2026
Career Development	<p>Career planning is the process of discovering educational, training, and professional opportunities that suit your interests, passions, and goals. The process allows you to identify your strengths and interests so you can discover professional opportunities you are likely to enjoy and excel in.</p> <p>This process includes a series of simple steps and can be reused throughout your career path to ensure you are working toward goals that will satisfy you.</p> <p>Steps of the career-planning process at Modern Niagara</p> <ol style="list-style-type: none"> 1.) Self-exploration and assessment 2.) Career research 3.) Complete your Individual Development Plan (IDP) 4.) Career exploration and experimentation <p>https://mngi365.sharepoint.com/sites/SelfServeCareerPathPlanning/SitePages/What-is-Career-Path-Planning-(1).aspx?web=1</p>	<p>Promotion and Advancement:</p> <ul style="list-style-type: none"> • Provide opportunities to move up in the organization- They should be openly publicized with the prerequisites for eligibility and the process that will be used to select the successful candidate identified. • All employees should be measured against the same criteria. • Persons with strong technical skills should have the same opportunity to demonstrate the skills for other jobs. Training should be made available to bridge technical and other jobs if necessary. An organization should acknowledge that there is more than one way to perform an assignment successfully and that requirements like "communication skills" may result in culturally 	In progress	Dec 31, 2026

		non-neutral criteria being applied.		
Performance Management	Modern Niagara shall consider the accessibility needs of employees with disabilities and individual accommodation plans when using its performance management process in respect of employees with disabilities.	Modern Niagara is committed to optimizing employee performance through continuous feedback and learning and development opportunities. The Modern Niagara Performance Development Program (PDP) aims to do so by providing employees feedback and guidance on Core Values and Core Competencies on a continuous basis.	In Progress	Dec 31, 2026

Definitions

Accessibility – giving individuals of all abilities opportunities to participate fully in everyday life. It describes how widely a service, product, device, or environment is available to as many individuals as possible. It can be seen as the ability to access and benefit from a system, service, product, or environment.

Assistive Devices – a technical aid, communication device, or other instrument used to maintain or improve the functional abilities of individuals with varying abilities. Personal assistive devices are typically brought with the individual—for example, a wheelchair, walker, or a personal oxygen tank.

Barrier – barriers are obstacles that limit access and prevent people with varying abilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of individuals with differing abilities are not considered.

Disability – a limitation experienced by a person that may be visible, non-visible, permanent, or occurring at certain times. It can occur in combination with other forms of varying abilities; types include, but are not limited to, physical, visual, auditory, developmental, linguistic, learning, mental, etc.

Service Animal – an animal for which it is readily apparent that the person uses the animal for reasons related to their disability or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability.

Support Person – another person who accompanies the person with a disability to help with communication, mobility, personal care of medical needs or access to services.

Consultations

Introduction

Modern Niagara Group remains dedicated to fostering workplace diversity, equity, and inclusion. As a part of this initiative, an anonymous survey was distributed to employees who self-identified as having a disability–



either visible or invisible—within our Human Resource Information System (HRIS). The survey aimed to identify potential barriers and areas for improvement to make our workplace more inclusive. The key findings are detailed below.

Survey Methodology and Response Rate

The survey was sent explicitly to employees recorded in our HRIS as having a disability. It featured questions tailored to elicit information on barriers, necessary actions, tools, or resources. Significantly, there was a 50% response rate, providing valuable data for our analysis.

Key Findings

Barriers Identified

Respondents were asked to indicate if they have faced any barriers related to their disabilities at work.

Suggested Actions and Resources

Further, the survey probed what specific actions, tools, or resources would be helpful.

Additional Feedback

The request was made for any additional feedback.

Discussion and Next Steps

While the 50% response rate does not capture the full scope of experiences, the findings still provide significant insights. The diversity in responses indicates that while some employees feel well-accommodated, there are areas requiring attention.

Conclusion

Modern Niagara Group is committed to an ongoing improvement process to create an inclusive work environment. This survey serves as a crucial step in understanding the unique challenges faced by our employees with disabilities. We will continue to actively seek ways to address these concerns, thereby adhering to regulatory requirements and enhancing our organizational culture.