



Multi-Year Accessibility Plan for Martin Brower

Martin Brower of Accessibility Standards – Statement of Commitment

Martin Brower of Canada Co. is committed to meeting the objectives and requirements outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* and the applicable regulations, and to meeting the accessibility needs of persons with disabilities in a timely manner, through the implementation of the requirements of the Act and its applicable regulations. This Plan applies to both Martin Brower of Canada Co. locations within Ontario.

For the purposes of the work of the Accessibility Committee and accessibility planning, the definition of the word “disability” is understood to be that which is identified in the *Ontarians with Disabilities Act, 2001* and the *Accessibility for Ontarians with Disabilities Act, 2005*. The definition in these statutes is taken from the Ontario Human Rights Code. This definition can be found in Appendix 1.



Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”)

The AODA develops, implements, and enforces accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures, and premises are accessible to persons with disabilities. The AODA intends to achieve an accessible Ontario by 01/01/25. To do so, mandatory and enforceable standards have been implemented.

The Standards include:

Customer Service Standard – Ontario Regulation 429/07

The Customer Service Standard (Ontario Regulation 429/07) was the first standard under the AODA to become law. It ensures that people with disabilities can receive goods and services in a manner that takes into account one’s disability.

Requirements include development of a policy, practices, procedures as well as the provision of training for staff and volunteers.

Martin Brower of Canada Co. submitted compliance reports to the Province indicating we had addressed the requirements of the Regulation and were meeting the compliance obligation. We will continue to ensure compliance with the Customer Service Standard.

We developed feedback processes to respond to inquiries and suggestions received by phone, email, mail, in person. This has been communicated to internal and external stakeholders.

Integrated Accessibility Standard Regulation (IASR) – Ontario Regulation 191/11

The IASR brings together the following standard areas in one Regulation: Information and Communication, Employment, Built Environment and Transportation. The Transportation Standard does not apply to us. General requirements common to all standard areas include policy development and training (on the requirements of the IASR and the *Ontario Human Rights Code*). Also there is a requirement to ensure that accessibility features are considered in the kiosk procurement process.

The requirements have staggered compliance dates up to the year 2021.



Martin Brower of Canada Co. Integrated Accessibility Standards Policy and Multi-Year Accessibility Plan – Development Process

The Accessibility Committee reviewed the requirements of the IASR. An IASR Policy was drafted to address how Martin Brower of Canada Co. achieves or will achieve accessibility through meeting the IASR's requirements. The Multi-Year Accessibility Plan was developed in accordance with the IASR. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA.

Multi-Year Accessibility Plan

Action	Compliance Date	Responsibility	Status
---------------	------------------------	-----------------------	---------------



Part I – General

This section of the Regulation requires us to:

- develop & maintain an accessibility policy and a multi-year accessibility plan
- self-service kiosks – consider accessibility features that best meet the needs of customers
- ensure staff and volunteers are trained on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code

Accessibility Policies <ul style="list-style-type: none"> • Develop and implement Integrated Accessibility Standards Policy. • Make the Policy publicly available and provide in an accessible format, upon request. • Review & update as required 	01/01/14	Accessibility Committee	Completed 01/01/14
Develop a Multi-Year Accessibility Plan <ol style="list-style-type: none"> 1. A Multi-Year Accessibility Plan was developed. 2. Post multi-year accessibility plan on website and provide in an accessible format, upon request. 3. Review and update the plan at least once every five years. 	<ol style="list-style-type: none"> 1. 01/01/14 2. 01/01/14 3. 01/01/19 	Accessibility Committee	<ol style="list-style-type: none"> 1. Completed 01/01/14 2. Completed 01/01/14 – posted on Sharepoint. 3. Plan to be reviewed annually and updated as necessary.
Action	Compliance Date	Responsibility	Status
Self Serve Kiosks	01/01/14 & Ongoing	Accessibility Committee	We are making the assumption the kiosk referenced in the Act is similar to Service Ontario kiosks. Employees needing accommodation to



<p>Process was developed as guidance for employees to have regard for the need of persons with disabilities when procuring or acquiring self-service kiosks.</p>			<p>access our kiosk (VIC/ReyesTrainer) will be addressed on an individual basis.</p>
<p>Training</p> <ul style="list-style-type: none"> • Ensure that training is developed on the IASR and the Human Rights Code as it pertains to persons with disabilities and is provided by Jan 1, 2015 to employees, volunteers, persons who participate in developing policies and others who provide goods, services or facilities on behalf of Martin Brower of Canada Co. • Update training as required. • Keep a record of the dates of training and the individuals who received the training. 	<p>01/01/15 & Ongoing</p>	<p>Accessibility Committee</p>	<p>Training completion schedule:</p> <ol style="list-style-type: none"> 1. MB Drivers – 11/19/14 2. MB Warehouse – by 01/17/15 3. MB Finance – 12/10/14 4. MB Trans mgmt – 12/10/14 5. MB Whse Mgmt – 12/22/14 6. MB CSRs – 12/17/14 7. MB CSR Mgmt – 12/10/14 8. MB Inv Control - by 01/17/15 8. MB Inv/Logistics- by 01/17/15 9. MB Inv/Planning US- by 01/17/15 10. MB Supply Chain – by 01/17/15 11. MB Ops Support - by 01/17/15 <p>AODA training was updated on the Edume App and all employees are required to complete the training in 2020.</p>



Part I – General

This section of the Regulation requires us to:

- develop & maintain an accessibility policy and a multi-year accessibility plan
- self-service kiosks – consider accessibility features that best meet the needs of customers
- ensure staff and volunteers are trained on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code

Action	Compliance Date	Responsibility	Status
<p>Feedback processes</p> <p>Ensure that processes for receiving and responding to feedback are accessible and meet the requirements of the IASR.</p>	01/01/15 & Ongoing	Accessibility Committee	<p>Completed 11/26/14 – Posted on Sharepoint and Posted in Reception areas of Brampton DC and Mississauga Head Office.</p> <p>Updated 01/22/2019- Address was updated for writing submissions</p>
<p>Accessible formats and communication supports</p> <p>*Upon request, to the extent practicable, provide for provision of accessible formats and communication supports for persons with disabilities.</p> <p>* Consult with person making the request to determine suitability of accessible format or communication support.</p> <p>* Put a statement on the website that we shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities at a cost no more than regular cost charged to other persons.</p>	01/01/16 & Ongoing	Accessibility Committee	<p>Completed 11/26/14 – Posted on Sharepoint and Posted in Reception areas of Brampton DC and Mississauga Head Office.</p>



Action	Compliance Date	Responsibility	Status
<p>Emergency procedures, plans or public safety information - Emergency procedures, plans or public safety information, that is publicly available, shall be provided in an accessible format or with appropriate communication supports, upon request as soon as practicable.</p>	<p>01/01/12 & Ongoing</p>	<p>Accessibility Committee</p>	<p>Completed 01/01/12</p>
<p>Accessible websites and web content * Websites and web content published after 2012 to conform to WCAG 2.0 Level A initially and increasing to WCAG 2.0 Level AA by Jan 1, 2021 to the extent practicable other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions). * Note – All WCAG2.0 requirements only apply to websites, web content and web based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible.</p>	<p>01/01/21</p>	<p>Web Development Team</p>	<p>Completed: May 2021 All WCAG2.0 requirements only apply to websites, web content and web based applications that an organization can control.</p> <p>Martin Brower Canada Co. only dictates the verbiage as it applies to Martin Brower Canada’s portion of the website. Website interface, design and flow etc. is driven out of corporate head quarters in Chicago. We have advised them of both requirement levels mid-2014 should websites and content be changed.</p> <p>Given that the control resides outside of our scope of influence in Ontario, Canada, it is MB’s expectation that both WCAG levels are to be completed by no later than 2021.</p>



Part III – Employment Standards

This section of the Regulation includes requirements related to:

- recruitment, assessment and selection
- accessible formats and communication supports for employees
- workplace emergency response
- individual accommodation plans and return to work processes
- performance management, career development and redeployment

Action	Compliance Date	Responsibility	Status
<p>Recruitment, Assessment, Selection</p> <ol style="list-style-type: none"> 1. Review and update existing recruitment, policies, procedures and processes. 2. Specify that accommodation is available for applicants with disabilities on the website and on job postings. 3. Inform applicants about the availability of accommodations: when called for an interview, during the selection process, at the time of the job offer and as soon as practicable after the new employee begins – specifically at orientation. 4. If selected applicant requests accommodation, consult with the applicant and arrange for provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability. 	<p>01/01/16 & Ongoing</p>	<p>Accessibility Committee</p>	<p>Completed May 2021; Reviewed & Updated Annually</p>



Action	Compliance Date	Responsibility	Status
Informing employees of supports * Inform current employees and new hires as soon as practicable after they begin employment of policies supporting employees with disabilities. * Keep employees up to date on changes to policies/procedures relating to accommodation.	01/01/16	Accessibility Committee	Completed December 2020; Reviewed & Updated Annually
Accessible formats and communication supports for employees * When requested by an employee with a disability, employers shall consult with the employee and provide or arrange for the provision of suitable accessible formats and communication supports needed to perform the employee's job.	01/01/16	Accessibility Committee	Reviewed on request
Workplace emergency response information * Individualized workplace emergency response information procedures have been developed for employees with disabilities.	01/01/12	Accessibility Committee	Completed 01/01/12
Documented individual accommodation plans / Return to work Process * Create a written process for development of documented individual accommodation plans and return to work plans for employees with disabilities. * Include in the	01/01/16	Accessibility Committee	Completed: March 15, 2021



<p>process and plans all of the required elements in accordance with the IASR.</p>			
Action	Compliance Date	Responsibility	Status
<p>Performance management, career development, advancement and redeployment</p> <p>1. Review and update existing policies, practices to ensure compliance with IASR</p> <p>2. Take the accessibility needs of employees with disabilities and, as applicable, individual accommodation plans, into account as part of performance management processes, when assessing performance, providing career development & advancement opportunities and considering redeployment.</p>	<p>01/01/16</p>	<p>Accessibility Committee</p>	<p>Policy updated 2021 and will be reviewed annually</p>



Part IV.1 – Design of Public Spaces Standards

This section of the Regulation includes requirements related to:

- recreational trails & beach access routes (NA)
- outdoor public use eating areas & outdoor play spaces
- exterior paths of travel
- parking
- obtaining service
- maintenance

Action	Compliance Date	Responsibility	Status
Obtaining service – Make service counters, queuing guide and waiting areas accessible. * Where practicable, all indoor or outdoor newly constructed service counters and fixed queuing guides and all newly constructed or redeveloped waiting areas will conform to all of the required elements in accordance with the provisions of the IASR.	01/01/17	Accessibility Committee	Waiting area is compliant
Maintain the accessible parts of our public spaces. * Identify preventative and emergency maintenance procedures & alternatives & procedures for handling disruptions and alternatives in accordance with the provisions of the IASR.	01/01/17	Accessibility Committee	Compliant



Action	Compliance Date	Responsibility	Status
<p>Make parking accessible * Where practicable, new and redeveloped parking areas meet certain technical requirements in accordance with the provisions of the IASR.</p>	01/01/17	Accessibility Committee	Compliant (5 accessible spots at the Brampton DC & 7 at the Mississauga Head Office)
<p>Make exterior paths of travel accessible. * Where practicable, new and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose (includes stairs, ramps, curb ramps, depressed curbs, pedestrian signals, rest areas) and not to provide a recreational experience meet certain technical requirements in accordance with the provisions of the IASR.</p>	01/01/17	Accessibility Committee	Target Completion date: 06/01/2016 – as applicable, referencing newly constructed Brampton Distribution Centre.
<p>Make outdoor public eating areas accessible. * If newly constructing or redeveloping outdoor public eating areas, where practicable, meet certain technical requirements in accordance with the provisions of the IASR.</p>	01/01/17	Accessibility Committee	Not applicable



Action	Compliance Date	Responsibility	Status
Make outdoor play spaces accessible (i.e. swings, splash pads, natural features such as sand and logs). * If building new or redeveloping outdoor play spaces, follow consultation process and technical requirements, where practicable, in accordance with the provisions of the IASR.	01/01/17	Accessibility Committee	Not applicable
<p>Part IV.2 – Transportation Standards</p> <p>Requirements for accessible transportation apply to persons and/or organizations that offer transportation services to the public or employees, and that are responsible for or provide the following types of services. As such, the following do not apply to Martin Brower:</p> <ul style="list-style-type: none"> • Conventional transportation • Specialized transportation • Public school transportation • Other transportation services • Ferry • Taxi 			
Action	Compliance Date	Responsibility	Status
General Requirements for Conventional and Specialized Transportation Service Providers -These sections cover training, accessibility equipment, emergency preparedness and response policies as well as policies relating to support persons, contracts to buy vehicles, and treatment of existing vehicles.	N/A	Accessibility Committee	Not applicable



Action	Compliance Date	Responsibility	Status
<p>Accessibility Plans - These three sections cover accessibility plans for conventional transportation service providers and specialized transportation service providers.</p>	N/A	Accessibility Committee	Not applicable
<p>General Requirements for Conventional Transportation Service Providers - These sections cover general requirements placed on conventional transportation service providers, such as to provide alternative accessible Transportation. The sections also cover fares, courtesy seats and transit stops as well as pre-boarding and on board announcements etc.</p>	N/A	Accessibility Committee	Not applicable
<p>Technical Requirements for Conventional Transportation Service Providers - These sections cover technical requirements regarding floors, signage, lighting features and indicators and alarms as well as stop requests and emergency response controls.</p>	N/A	Accessibility Committee	Not applicable



Action	Compliance Date	Responsibility	Status
<p>Specialized Transportation Service Providers - These sections include requirements for establishing categories for eligibility, and for allowing people with disabilities to use specialized services because of an emergency or on compassionate grounds. The sections also cover fare parity, hours of service, service delays and trip restrictions among other requirements.</p>	N/A	Accessibility Committee	Not applicable
<p>Other Transportation Services - These three sections deal with transportation provided by school boards, universities and colleges, and by hospitals. There is also a requirement that covers ferries that are operated only in Ontario.</p>	N/A	Accessibility Committee	Not applicable
<p>Duties of Municipalities and Taxicabs - These three sections include general requirements for municipalities regarding bus stops and shelters and accessible taxicabs.</p>	N/A	Accessibility Committee	Not applicable



Reporting Dates for Martin Brower of Canada Co.

1. Customer Service Standard – 12/31/14 (requirement to report annually)
2. IASR – 12/31/14 (requirement to report annually)

Next Steps

- Prepare Compliance Report on Customer Service Standard AND IASR Standard – 12/31/14 [Completed in 2020]
- Monitor and review accessibility procedures and update as required
- Develop detailed action plans, communication strategies & continue training (IASR) [Introduced New Hire Training on Edume platform]
- Develop & prepare and provide an annual update in September of each year on the Multi-Year Accessibility Plan

Feedback

We welcome your feedback.

Email: aoda@mbcan.com

Phone: 905 790 1700 press 317423 or **Fax:** (416) 790-7721

Write:

*Martin Brower of Canada Co., 6985 Financial Drive, 3rd Floor, Mississauga, Ontario L3Z 4L8
Attention: Accessibility Department – Human Resources*

Feedback Forms can be picked up at the address above and may also be accessed at the Martin Brower of Canada Co. distribution centre in Brampton located at 525 Deerhurst Drive, Brampton, Ontario L6T 5K3.



Appendix 1 – Definition of disability

Disability, as defined by the AODA and the *Ontario Human Rights Code*, is:

- 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 impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- a condition of mental impairment or a developmental disability,
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- a mental disorder, or

an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.