



ROMA FENCE GROUP OF COMPANIES' Multi-Year Accessibility Plan

The Roma Fence Group of Companies (Roma Fence Ltd., Roma Fence (East) Inc., Roma Fence (West) Inc., and Advanced Entry Systems of Canada) is committed to meeting the objectives and requirements outlined in the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and meeting the accessibility needs of persons with disabilities, through the implementation of the AODA requirements. This multi-Year Accessibility Plan outlines the Roma Fence Group of Companies' (Roma Fence) strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill the Roma Fence's commitment as outlined in the Roma Fence Group of Companies Accessibility Policy and applies to all employees of the Roma Fence Group of Companies.

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 *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* defines a disability as:

- 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 coordination, blindness, 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 processes involved in learning or 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 under the Workplace Safety and Insurance Act, 1997

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 January 1, 2025. In order to achieve accessibility by 2025, mandatory standards have been implemented.

The standards include:

Customer Service Accessibility Standard – Ontario Regulation 429/07

- The Customer Service Standard, the first standard under the Accessibility for Ontarians with Disabilities Act, 2005 was passed by the Ontario legislature with the goal of addressing service in all manner of public and private business relationships.

- Requirements include development of a policy, practices, procedures as well as the provision of training for staff (full-time, part-time, temporary) and volunteers.
- The Roma Fence Group of Companies submitted compliance reports to the Ontario Government 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.

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 Built Environment and 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).
- The requirements have staggered compliance dates up to the year 2021.

Multi-Year Accessibility Plan

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.

PART 1 – General

This section of the Regulation requires us to:

- Develop and maintain an accessibility policy and a multi-year plan
- Ensure staff and volunteers are trained on the Integrated Accessibility Standards Regulation (IASR) and Human Rights Code.

Accessibility Policies

- Develop and implement AODA Policy
- Make the policy available and provide it in a accessible format, upon request
- Review & update as required

Required Legislative Compliance Date: January 1, 2012

Status of Compliance: completed

Develop a multi-year accessibility plan

- A multi-year accessibility plan was developed.
- Make the multi-year accessibility plan publically available and provide it in an accessible format upon request.
- Review the multi-year plan and update it every five years

Required Legislative Compliance Date: January 1, 2015
Status of Compliance: completed/ongoing

Training

- Ensure all employees (full-time, part-time, seasonal and contract) who provide services on behalf of the Roma Fence Group of Companies are trained on Ontario's accessibility laws and Human Rights Code as it relates to people with disabilities.
- Keep a record of dates and individuals who have received the training

Required Legislative Compliance Date: January 1, 2012
Status of Compliance: Ongoing

PART II – Information and Communications Standards

Roma Fence Group of Companies will create, provide and receive information and communications in ways that are accessible to people with disabilities. If Roma Fence Group of Companies determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, we will be obligated to provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

Accessible Emergency Information

If Roma Fence Group of Companies prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Required Legislative Compliance Date: January 1, 2012
Status: Completed/ongoing

Feedback, Accessible Formats and Communication Supports

Roma Fence Group of Companies has a policy and process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. In addition, in accordance with the IASR, Roma Fence Group of Companies will provide or arrange for accessible formats and communication supports for persons with disabilities, upon request in a timely manner. Notify the public that we shall, upon request provide and arrange for the provision of accessible formats and communications supports for persons with disabilities.

Required Legislative Compliance Date: Feedback - January 1, 2015.
Accessible Formats & Communication Supports – January 1, 2016
Status: In progress

Website Accessibility

Roma Fence Group of Companies shall take the following steps to make its internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA:

- Ensure that any web content developed internally or externally meets the Information and Communication Standard and that content developers/vendors have the necessary expertise to develop such content;
- Ensure that by January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA.

Roma Fence Group of Companies is happy to provide the eSSENTIAL Accessibility™ tool set on the Roma Fence Group of Companies family of websites. The application features an array of keyboard and mouse replacement solutions (alternative input methods including a webcam-based hands-free movement tracking system) that allow guests

Required Legislative Compliance Date: New Content (WCAG 2.0 Level A) – January 1, 2015 All Content (WCAG 2.0 Level AA) - January 1, 2021

Status: Ongoing/In progress

Part III - Employment Standards

The Roma Fence Group of Companies is committed to inclusive and accessible employment practices that attract and retain individuals with disabilities. We have ten the following steps to notify the public and employees that, when requested, the Roma Fence Group of Companies will accommodate people with disabilities throughout the recruitment and on-boarding process.

Recruitment, Assessment, Selection

The Roma Fence Group of Companies is committed to ensuring that our recruitment and assessment processes are fair and accessible.

- Review and update existing recruitment policies, procedures and processes.
- Indicate on websites and job postings, that accommodation is available for candidates with disabilities.
- Inform candidates about the availability of accommodations: when called for an interview, during the selection process, at the time of the job offer, and at new-hire orientation.
- If the selected candidate requests accommodation, consult with the candidate and arrange for provision of suitable accommodation in a manner that takes into account the candidate's accessibility needs.

Informing Employees of Accommodations

- Inform current employees and new hires of policies supporting employees with disabilities.
- Keep employees up to date on changes to policies/procedures relating to accessible formats and accommodations for persons with disabilities.

Accessible formats and communication supports for employees

- When requested by an employee with a disability, employers shall consult the employee and provide, or arrange for the provision of suitable accessible formats and communication supports for the employee to perform their job.

Workplace Emergency Response Information (self-identity form)

- Individualized workplace emergency response information procedures have been developed for employees with disabilities.

Documented individual accommodation plans/return to work processes

The Roma Fence Group of Companies is committed to providing documented individual accommodation plans that include the following:

- Participation of the employee requiring the individual accommodation plan.
- Requesting outside medical evaluation, to the extent necessary, to determine if accommodation can be achieved and how.
- Ensuring a high level of privacy is achieved, and that information is only disclosed to individuals as necessary and in order to achieve the accommodation needs of the person with a disability.
- Providing regular review, updates and communications with employee during the accommodation process.
- Providing an employee with information if a request for accommodation is denied.
- Providing Individual Accommodation Plans in a format that takes into account the needs of the employee.
- If required, including individualized workplace emergency response information.

Return to Work

The Roma Fence Group of Companies is committed to developing and putting in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.

The Roma Fence Group of Companies has developed and maintains a return to work process for our employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The process includes steps the HRP takes to facilitate the return to work process and uses the documented individual accommodation plan.

Performance Management, Career Development and Redeployment

The Roma Fence Group of Companies is committed to ensuring the accessibility needs of employees with disability needs are taken into account with regards to performance management, career development and redeployment processes.

The Roma Fence Group of Companies will review the following information and update all relevant accommodation policies to include the following:

- Policies that support addressing the accessibility needs of employees with disabilities, as well as taking into account individual accommodation plans when using performance management processes.
- Policies that support addressing the accessibility needs of employees with disabilities, as well as taking into account individual accommodation plans when providing career development and advancement opportunities.
- Policies that support addressing the accessibility needs of employees with disabilities, as well as taking into account individual accommodation plans when redeploying employees with disabilities.

Accessibility Review

The Roma Fence Group of Companies discusses issues of accessibility and monitors compliance with the requirements of AODA by periodic review of policies and practices, and policy reviews conducted by senior management and HR department.

Contact Details

For more information on this accessibility plan, please contact:

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