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| **ABOUT US** |

Operating for over 30 years, Bolton Railings Inc. (“Bolton Railings” or “the Company”) has merged Old-World craftsmanship and customer service with the latest in railing innovation and design to produce both interior and exterior railings for both residential and commercial properties across the region. Our product lines range from commercial stairs to extravagant railings which grace the halls of some of our area’s most exclusive custom homes. At Bolton Railings, every client is important and is treated with equal respect, no matter the magnitude of their project. Relationships are important to us, and we are proud to say that some of our loyal customers have been working with us for more than 25 years.

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| **INTRODUCTION** |

The *Accessibility for Ontarians with Disabilities Act, 2005, (AODA)* was passed in June 2005, with the purpose of developing, implementing and enforcing accessibility standards for Ontarians. The goal of the AODA is for Ontario to be fully accessible by January 1, 2025, by implementing a series of accessibility standards. These standards focus on identifying, removing and preventing barriers for persons with disabilities.

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| **STATEMENT OF COMMITMENT** |

Bolton Railings is committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities. This will be achieved by identifying and removing barriers that impede a person’s ability to access goods and services, ensuring everyone is provided with equal opportunities whenever they interact with us.

We are also committed to equal treatment with respect to employment.

Approximately 1.8 million Ontarians have a disability, and this number is growing as the population ages. Bolton Railings has an important responsibility for ensuring a safe, respectful and welcoming environment for our team members, customers and third parties that do business with the Company.

Bolton Railings will strive to ensure that our policies, practices and procedures are consistent with the following core principles as outlined in the AODA:

***Dignity*** – Goods and services are provided in a manner that is respectful to persons with disabilities and do not diminish the person’s importance.

***Independence*** – Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

***Integration*** – Wherever possible, services will be provided in a manner that enables people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers or third parties. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

***Equal Opportunity*** – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

Under the AODA, the following accessibility standard requirements are applicable to Bolton Railings:

* Customer Service Standard
* General Requirements
* Information and Communications Standards
* Employment Standard
* Design of Public Spaces

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| **PART 1 – CUSTOMER SERVICE STANDARD** | | | | | |
| **This section of the Regulation requires that Bolton Railings:**   * Establish policies, practices and procedures on providing goods and/or services to people with disabilities * Reasonably ensure that policies, practices and procedures are consistent with core principles of independence, dignity, integration and equality of opportunity * Set a policy on allowing people to use their own assistive devices to access our goods and/or services * Communicate with persons with disabilities in a manner that takes into account their disability * Allow persons with disabilities to be accompanied by their service animal * Permit persons with disabilities who use a support person to bring that person with them while accessing our goods and/or services * Provide notice when facilities and services that people with disabilities rely on, are temporarily disrupted * Train team members and third parties who act on our behalf about the customer service standard * Establish a process for providing feedback on how we provide goods and/or services to people with disabilities | | | | | |
| **Regulatory Requirement** | **Compliance Deadline** | **Deliverables** | **Actions/Progress** | **Due Date** | **Status** |
| **Establish policies, practices and procedures on providing goods and/or services to people with disabilities** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Ensure policies are consistent with core principles of independence, dignity, integration and equality of opportunity** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Set a policy on allowing people to use their own assistive devices to access our goods and/or services** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Policy on communicating with persons with disabilities in a manner that takes into account their disability** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Policy and procedure on allowing persons with disabilities to be accompanied by their service animal**   * In those areas of premises Bolton Railings operates that are open to the public * Unless the animal is excluded by another law * If animal cannot access parts of our premises, use other measures to provide services to the person with the disability | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Policy and procedure on permitting persons with disabilities to use a Support Person** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Policy and procedure on temporary disruptions** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Train team members and third parties who act on our behalf about the customer service standard** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |
| **Establish a process for receiving and responding to feedback on how we provide goods and/or services to people with disabilities, and how we respond to complaints** | January 1, 2012 | Complete | Complete | ~~December 2011~~  Complete | □ Incomplete  □ In progress  Complete |

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| **PART 2 – GENERAL REQUIREMENTS** | | | | | |
| **This section of the Regulation requires that Bolton Railings:**   * Develop accessibility policies and a multi-year accessibility plan * Report on the progress of the multi-year plan * Ensure team members have been trained on the Integrated Accessibility Standards Regulation (“IASR”) and the Ontario Human Rights Code | | | | | |
| **Regulatory Requirement** | **Compliance Deadline** | **Deliverables** | **Actions/Progress** | **Due Date** | **Status** |
| **Develop accessibility policies**   * Develop, implement and maintain policies about what your organization will do to meet the IASR requirements and become more accessible * Statement of commitment * Make policies available to the public * Ensure the Bolton Railings Accessibility Policy and Program is in compliance with the current AODA requirements at all times, including each of the Standards. | January 1, 2014 | Complete | Complete | ~~December 2013~~  Complete | □ Incomplete  □ In progress  Complete |
| **Develop a multi- year accessibility plan**   * Establish, implement, maintain and document a multi-year accessibility plan * Post multi-year accessibility plan on website and provide in an accessible format, upon request * Review/update the plan at least every 5 years, if not more frequently. | January 1, 2014 | Complete | Complete | ~~December 2013~~  Complete  Updated September 2021. | □ Incomplete  □ In progress  Complete |
| **Self-service kiosks**   * Incorporate accessibility features when designing, procuring or acquiring self-service kiosks. * Large organizations and small organizations shall have regard to the accessibility for persons with disability when designing, procuring or acquiring self- service kiosks. | January 1, 2014 | * If we do purchase self-serve kiosks, we will develop a plan on the procuring/acquiring of accessible self-serve kiosks | Currently N/A | Currently N/A | Currently N/A |
| **Training**   * Ensure that training is completed on the AODA generally, the Bolton Railings policies and processes around the AODA and Accessibility and our commitment, Customer Service Standard, Information and Communications Standard, Employment Standard, Design of Public Spaces, IASR and the Human Rights Code as it pertains to persons with disabilities is provided to team members, third parties acting on behalf of the Company; and persons who participate in developing our policies and others who provide goods, services or facilities on behalf of the Company. | January 1, 2015 | Complete | * Training program will continue to be updated as policies are revised, or new policies are added. * Training is completed through an online module when new team members join. * All team members are tested on the training to demonstrate knowledge transfer. | ~~December 2014~~  Complete | □ Incomplete  In progress  Complete |

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| **PART 3 – INFORMATION AND COMMUNICATION STANDARD** | | | | | |
| **This section of the Regulation includes requirements related to:**   * Accessible websites and web content using the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and AA * Accessible feedback processes * Accessible formats and communication | | | | | |
| **Regulatory Requirement** | **Compliance Deadline** | **Deliverables** | **Actions/Progress** | **Due Date** | **Status** |
| **Accessible websites and web content**   * Websites and web content to conform to WCAG 2.0 Level A and AA if/when our website undergoes a significant refresh or web content changes. | January 1, 2014- January 1, 2021 | Complete | * Website has been run through two accessibility readers (WAVE, and AC Web Accessibility Reader) and received a passing score. * As website is updated this will continue to be reviewed. | ~~January 1, 2021~~  Complete | □ Incomplete   In progress   Complete |
| **Feedback processes**   * Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing/arranging for accessible formats and communication supports, upon request * Notify the public about the availability of accessible formats and communication supports | January 1, 2015 | Complete | Complete | ~~December 2014~~ Complete | □ Incomplete  □ In progress  Complete |
| **Accessible formats and communication supports**   * Upon request, provide for provision of accessible formats and communication supports for persons with disabilities * Notify the public about the availability of accessible formats and communication supports | January 1, 2016 | Complete | Complete | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |

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| **PART 4 – EMPLOYMENT STANDARD** | | | | | |
| **This section of the Regulation includes requirements related to:**   * Recruitment, assessment and selection * Accessible formats and communication supports for team members * Workplace emergency response information * Return to work process * Performance management, career development/advancement and redeployment | | | | | |
| **Regulatory Requirement** | **Compliance Deadline** | **Deliverables** | **Actions/Progress** | **Due Date** | **Status** |
| **Recruitment**   * Notify team members and the public about the availability of accommodation for applicants with disabilities in the recruitment process | January 1, 2016 | Complete | Complete | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
| **Recruitment, assessment, or selection process**   * Notify job applicants when they are individually selected to participate in an assessment/selection process that accommodations are available upon request in relation to the materials or processes used during the recruitment process. | January 1, 2016 | Complete | Complete | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
| **Notice to successful applicants**   * When making an offer of employment, notify successful applicants of policies for accommodating team members with disabilities. | January 1, 2016 | Complete | Complete | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
| **Informing team members of support**   * Inform team members of policies used to support team members with disabilities (ex. Provisions of job accommodations that take into account team member’s accessibility needs) as soon as practicable * Information shall be provided to new team members as soon as practicable after they begin their employment * Employers shall provide updated information whenever there is a change to existing policies on the provision of job accommodation that take into account a team member’s accessibility needs due to disability | January 1, 2016 | Complete | * This is complete but as new people start or as the needs of current team members change, will continue this. | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
| **Accessible formats and communication supports for team members**   * When requested by a team member with a disability, employers shall provide or arrange for the provision of accessible formats and communication supports for information needed to perform the team member’s job, and information generally available to team members in workplace. | January 1, 2016 | Complete | * This is complete but as new people start or as the needs of current team members change, will continue this. | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
| **Workplace emergency response information**   * Provide individualized workplace emergency response information to team members who have a disability as required * If a team member requires assistance, with their consent, provide the response information to a person who will provide that assistance * Provide the information as soon as practicable upon finding out about the accommodation requirement * The emergency response information will be reviewed:  1. When the team member transfers 2. When their needs or plans are reviewed 3. When all emergency response policies are reviewed | January 1, 2012 | Complete | * This is complete but as new people start or as the needs of current team members change, will continue this. | ~~December 2011~~  Complete | □ Incomplete  □ In progress   Complete |
| **Documented individual accommodation plans**   * Develop and have in place a written process for the development of documented individual accommodation plans for team members with disabilities | January 1, 2016 | Complete | Complete | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
| **Return to work process**   * Develop and have in place a return-to-work process for team members who have been absent from work due to a disability and require disability related accommodations to return to work | January 1, 2016 | Complete | Complete | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
| **Performance management, career development and redeployment**   * Take into account accessibility needs of team members with disabilities and individual accommodation plans as part of performance management processes, when providing career development opportunities and considering redeployment (transfer) | January 1, 2016 | Complete | Complete | ~~December 2015~~  Complete | □ Incomplete  □ In progress   Complete |
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| **PART 5 – DESIGN OF PUBLIC SPACES** | | | | | |
| **This section of the Regulation includes requirements related to:**   * Make newly built service counters and waiting areas functional for people with low vision and people who use mobility aides like walkers or wheelchairs. | | | | | |
| **Regulatory Requirement** | **Compliance Deadline** | **Deliverables** | **Actions/Progress** | **Due Date** | **Status** |
| **Service Counters**   * When creating or redeveloping indoor check-out/customer counters, you must adhere to guidelines set out by the standards: * Make at least one service counter low enough to allow for a person using a wheelchair to interact with the person providing service. There should also be enough room under the counter for the knees of a person sitting in a wheelchair. * Make all service counters accessible if your organization has a single waiting line for all of them. * Provide at least one accessible counter for each of your organization’s services | January 1, 2017 | * As new customer service spaces are developed or existing spaces are renovated for customer access (as applicable), counter areas need to be adjusted or created to ensure accessibility needs are met. | * As new spaces are created and as existing spaces are renovated, this will be completed at the given location. | ~~January 17, 2017~~  Complete | □ Incomplete   In progress   Complete |