

	AODA MULTI YEAR PLAN	Reference	AODA
		Approved By	Senior VP of HR
		Effective Date	Jan 1, 2014
		Date of Review	December 12, 2023

AODA MULTI YEAR PLAN

INTRODUCTION

The Bailey Group of Companies consisting of Bailey Metal Products Limited and Bailey Metal Processing Limited (here in after referred as “BGC”) is committed to working towards full compliance with all standards under the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") as they are introduced. In doing so, we affirm our commitment to providing quality services in a manner that respects the dignity and independence of persons with disabilities.

The Multi-Year Accessibility Plan outlines the policies, achievements, and actions that BGC have put in place to improve opportunities for people with disabilities. The current plan covers a five-year period (2023-2028) to align with our strategic plan.

ABOUT RELAVANT BGC LOCATIONS

The Bailey Metal Products Limited (BMP) is a manufacturing company specializing in roll-forming operation. BMP employs approximately 250 associates. It services the construction industry and is in Concord, Ontario.

The Bailey Metal Processing Limited (BMPL) is a manufacturing company specializing in providing slitting services to Bailey Metal Products Limited and other customers. BMPL employs just over 70 associates. The facility is in Burlington, Ontario

STATEMENT OF COMMITMENT

BGC is committed to treating all people with dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under AODA.

BGC is committed to continue developing, implementing, and maintaining policies governing how it will achieve accessibility through meeting the requirements under AODA and its associated regulations, the Customer Service Accessibility Standard, and the Integrated Accessibility Standard. To facilitate that commitment, BGC will establish, maintain, and document a multi-year accessibility plan that will be reviewed and updated every three years to identify progress made in addressing barriers.

The plan is posted on both the BMP website and BMPL website.

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I. CUSTOMER SERVICE ACCESSIBILITY STANDARD

The Customer Service Standard, the first standard under AODA was implemented by BGC in 2011.

BGC uses reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Services are provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of services to persons with disabilities, and others, is integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis.
- Persons with disabilities may use assistive devices and/or support persons in the access of goods or services.
- Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law.
- BGC associates, when communicating with a person with a disability, will do so in a manner that considers the person's disability.

BGC has been in compliance with the Accessible Customer Service Regulation under AODA since 2011.

The following measures have been implemented by BGC:

- A member of management has been designated to present and/or revise practices or procedures. A policy review occurs annually.
- The Accessible Customer Service Policy is developed and available.
- Notice will be provided on the website, email, over the phone or in writing where applicable when a service disruption occurs and will be done as quickly as possible if the disruption is unexpected.
- Training on AODA Customer Service has been provided and is given to every person who participates in developing the policy, practices, and procedures and this includes every person who deals with the public on behalf of BGC, i.e., associates, management, and volunteers as applicable.
- AODA Training, including Customer Service, is also part of mandatory onboarding for all new hires at BGC.
- Completion of training of all associates is tracked and recorded.
- Comments relating to our programs and services regarding customer service are welcomed and appreciated. A process has been established to encourage feedback regarding the way that BGC provides goods and services to people with disabilities. The feedback process is posted on the BGC website, and comments can also be made verbally, by e-mail, or in writing.

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- All feedback collected from clients, staff or the public is reviewed and analyzed to identify potential gaps in customer services, and to ensure appropriate actions are taken.
- Report compliance with the customer service standard
- All regulatory-related requests for accommodation and accessibility needs by the public and customers will be handled by the Senior Vice President of Human Resources in accordance with the requirements set forth in AODA and its associated regulations and the Ontario Human Rights Code.

II. INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)

a) Accessible Emergency Information

In accordance with section 13 of the Ontario Regulation 191/11, BGC has developed emergency and safety procedures to follow in each emergency (fire, bomb threat, earthquake, lockdown etc.) These procedures will be provided to individuals with disabilities upon request.

BGC recommends that all persons with disabilities or special needs become familiar with the emergency procedures and policies.

During the onboarding process for new hires, BGC informs new hires of the availability of individual emergency response plans that considers their disability.

BGC is committed to providing members, associates, and the public with publicly available emergency information, plans or public safety information in an accessible manner upon request.

BGC will continue to provide associates with disabilities with individualized emergency response information when necessary, and as soon as practically possible. If an associate who receives individualized workplace emergency response information requires assistance, with the associate's consent the workplace emergency response information will be given to the designated associate providing the assistance.

BGC has a process for documenting issues of accessibility and recording and providing accommodation for individualized accessible emergency response information. BGC will continue to review the individualized workplace emergency response plans when necessary, such as when the location of an associate changes.

b) Training

BGC will provide training to associates, volunteers and other applicable individuals on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will

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be provided in a manner that best suits the duties and needs of associates, and volunteers and every person who deals with the public on behalf of BGC, including third parties i.e., associates, volunteers, or management.

BGC has taken the following steps to ensure associates were provided with the training needed to meet Ontario's accessible laws:

- Developed a process that determines and ensures that correct training is delivered on the requirements of the IASR and the Ontario Human Rights Code.
- Providing educational or training resources or materials in an accessible format that considers the accessibility needs of a person with a disability upon request.
- Ensures that all new associates and volunteers all complete AODA training within two weeks of employment.
- Maintains a database of the training, participant's names, and dates of completion of training. All associates and volunteers who have received training will be required to sign off that they have received training in accordance with AODA.

III. INFORMATION AND COMMUNICATIONS STANDARD

BGC is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs. We want to achieve the most effective and efficient access to information for all users.

To achieve this objective, BGC has undertaken the following plans to ensure compliance with the IASR standard:

- That BGC will ensure that essential information is accessible to persons with disabilities.
- A feedback process has been established that is accessible. Alternate formats are also available such as telephone, mail, and in-person. These processes have been communicated to the public and are available on our website.
- Our websites has been designed to be user friendly for people with a range of needs.
- Training on the AODA Information and Communication Standards has been provided to associates that are involved in developing or disseminating information internally or externally on behalf of the organization.

Website Information

In accordance with the IASR, BGC can convert existing emergency & public safety information into a format that will allow it to be made available in accessible formats on request and in a timely manner.

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BGC has complied with the IASR requirements and made its website and content compliant to conform to World Wide Web Consortium Web Content Accessibility Guidelines 2.0, Level AA.

The BGC can also do the following:

- Continue to assess accessibility of existing website organization and content.
- Consult with people requesting alternative formats.
- Post a notice on the website and on premises that information is available in a variety of accessible formats.

IV. EMPLOYMENT STANDARD

BGC is committed to inclusive and accessible employment practices that attract and retain individuals with disabilities. We have taken the following steps to notify the public and associates that when requested, BGC will accommodate people with disabilities throughout all phases of the employment relationship, which are detailed more fully below.

a) Recruitment

BGC is committed to ensuring that our recruitment and assessment processes are fair and accessible. All supervisors and management who are involved in hiring are required to complete AODA and Human Rights training.

BGC will take the following steps to ensure compliance with this standard:

- Specify that accommodation is available for applicants with disabilities throughout the entire recruitment process in the recruitment material.
- When making offers of employment, BGC will notify successful applicants of policies for accommodating associates with disabilities within the Employment Agreement.
- All BGC job postings will state that accommodation will be available upon request for persons with disabilities.
- Inform associates of policies supporting associates with disabilities. This information will be provided to new associates as soon as is practicable after hiring.
- Provide updated information on accommodation policies to associates when they occur.
- Consult with associate to determine suitability of format or support.

b) Documented Individualized Accommodation Plans:

BGC is committed to providing documented individual accommodation plans that include the following:

- Participation of the associate requiring the individual accommodation plan.

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

c) Return to Work

BGC is committed to developing and putting in place a process for developing individual accommodation plans and return-to-work policies for associates that have been absent due to a disability or injury.

BGC has developed and maintains a return-to-work process for our associates who have been absent from work due to a disability and require disability-related accommodation to return to work. The accommodation process is outlined in the BGC's Equal Opportunity (Accommodation) Policy. The process includes steps the BGC takes to facilitate the return-to-work process and uses the documented individual accommodation plan.

d) Performance Management, Career Development and Redeployment

BGC is committed to ensuring the accessibility needs of associates with disability needs are considered with regards to performance management, career development and redeployment processes.

BGC will review the following information and update all relevant accommodation policies to include the following:

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

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- Policies that support addressing the accessibility needs of associates with disabilities, as well as considering individual accommodation plans when redeploying associates with disabilities.

V. TRANSPORTATION STANDARD

BGC does not transport associates to work. However, BGC is committed to maintaining policies, planning for accessibility, and training staff to comply with the accessibility standards related to the Transportation Standards outlined in the AODA.

As required, associates involved in transporting people – either for free or for a fee, will complete the Accessibility Standards course that includes the Transportation Standard module.

VI. DESIGN OF PUBLIC SPACES

BGC does not have any plans for new construction or significant redevelopment of its Ontario plants to which the Design of Public Spaces Standard of the Integrated Accessibility Standards Regulation is applicable. If it becomes applicable, BGC will comply with the required responsibilities under this Standard.

BGC will put in place procedures to prevent service disruption to accessible elements of its public spaces as required under the Design of Public Spaces Standard. In the event of a service disruption affecting these accessible elements, BGC will notify the public of such service disruption and any available alternatives.

Accessibility Review

The BGC discusses issues of accessibility and monitors compliance with the requirements of AODA by periodic review of policies and practices at Joint Health and Safety meetings, and or policy reviews conducted by Senior Vice President of Human Resources.

Contact Details

For more information on this accessibility plan, please contact:

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