



ELEMENT FLEET MANAGEMENT (“ELEMENT”) AODA Multi-Year Accessibility Plan

As of December 1, 2017

1. Introduction

- A. This Plan has been prepared in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and its associated regulations, the *Accessibility Standards for Customer Service* and the *Integrated Accessibility Standards*.
- B. Pursuant to section 4 of the *Integrated Accessibility Standards*, Element is required to have in place a multi-year accessibility plan. A multi-year accessibility plan is a plan that describes the specific short-term and long-term actions that Element will take to meet its obligations under the *Integrated Accessibility Standards*. This plan covers both the actions Element will take under the *Accessibility Standards for Customer Service* and the *Integrated Accessibility Standards*.
- C. This Plan is applicable to Ontario, Canada.
- D. The multi-year accessibility plan will be reviewed and updated at least once every five years, will be posted on Element’s website and will be provided in accessible format upon request.

2. Process

- A. The 2017-2021 Multi-Year Accessibility Plan follows:

AODA Multi-Year Accessibility Plan			
Element Fleet Management Inc.			
2017-2021			
Compliance Area	Action Item	Status	Additional Comments
2017 Action Items			
Accessibility Policy	Develop, implement and maintain policies and programs governing how Element will achieve accessibility through meeting the requirements set out in the AODA and its regulations and include a statement of commitment to meeting the accessibility needs of people with disability in those policies and programs.	Completed	

Accessibility Plan	Establish, implement and maintain a multi-year accessibility plan outlining Element's strategy to prevent and remove barriers to accessibility and to meet the requirements set out in the AODA and its regulations. Conduct a workplace assessment for barriers to accessibility.	Completed	
Training	Train all applicable persons on: Element's AODA policies and programs, AODA and the Human Rights Code, and Accessibility Standards for Customer Service.	Completed and on-going as needed.	
Assistive Devices (Customer Services)	Ensure that Element is able to accommodate the use of an assistive device by a person with a disability on its premises.	Completed and on-going as needed.	Element permits use of assistive devices on its premises and will make every effort to facilitate and accommodate the use of assistive devices at Element.
Service Animals and Support Persons (Customer Service)	Ensure that service animals and support persons are able to enter premises to accompany a person with a disability.	Completed.	
Notice of Temporary Disruptions in Service	Ensure that notice of temporary disruptions in services or facilities that people with disability use to access Element's internal facilities, goods or services is posted. Reconfirm with Facilities the process and notification required.	Completed	

Accessibility Compliance Report	File an Accessibility Compliance Report with the Ministry of Economic Development, Trade and Employment. Due 12/31/2017	Completed	Completed 12/19/2017
Individualized Workplace Emergency Response Information (IAS)	Ensure that employees with disabilities are provided with individualized workplace emergency response information, to be set out in Element's Emergency Response Plan and Employee Intake Assessment-Emergency Response Plans form.	Completed	
Accessible Feedback Process (IAS)	Ensure that Element's feedback process is accessible to people with disabilities by providing for or arranging for the provision of accessible formats and communications supports upon request.	Completed	Upon request, Element will arrange for communication supports and/or provide information regarding its feedback process in an accessible format to persons with disabilities in a timely manner.
Accessible Formats and Communication Support (IAS)	Ensure that Element is able to communicate with people with disabilities by providing accessible formats and communication supports where necessary.	Completed	Upon request, Element will arrange for communication supports and/or provide information in an accessible format to persons with disabilities in a timely manner.
Accessible Website (IAS)	Ensure that Element's website and web content conform to the World Wide Web Consortium	Completed	

	Web Content Accessibility Guidelines 2.0 Level A.		
Employment Standard - Recruitment (IAS)	Notify job applicants of the availability of accommodations for people with disabilities throughout the recruitment process and in relation to any materials or processes used to assess or select job applicants.	Completed	
Employment Standard - Informing Employees of Supports (IAS)	Notify successful job applicants and employees that accommodations for employees with disabilities are available.	Completed	
Employment Standard - Information and Communication Supports for Employees (IAS)	Provide employees with information that is needed to perform a job and information that is generally available in the workplace in an accessible format or with the appropriate communication support.	Completed / on-going as requested	
Employment Standard - Documented Individual Accommodation Plans (IAS)	Prepare documented individual accommodation plans for employees with disabilities setting out how the employee will be accommodated. To be set out in Element's HRIS system with documentation provided by benefit provider as the servicer to Element, and individual accommodation request forms.	Completed	

Employment Standard - Return to Work Process (IAS)	Ensure that a return to work process for employees with disabilities is in place. To be set out in Element's return to work plan as provided by benefits provider, in writing. Follow the directives of Element's Return to Work Policy detailed in the Canada Element Employee Policies and Procedures handbook.	Completed	
Employment Standard - Performance Management, Career Development and Redeployment (IAS)	Ensure that performance management processes and career development and redeployment opportunities, if any, take an employee's accessibility needs due to disability into account.	Completed / on-going as needed	
Compliance Area	Action Item	Status	Additional Comments
2018 Action Items			
Accessible Website (IAS)	Take steps to ensure that Element's website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 Level AA by 2021.	To be completed by 2021	
Employment Standard - Documented Individual Accommodation Plans (IAS)	Review current individual accommodation plan procedures. Consider and implement revisions to accommodation plan process as required.	To be completed in 2018	Human Resources and Compliance; Legal as applicable
Training	Continue to provide training as required. Identify any additional AODA-related training needs for certain positions and provide additional training to identified positions as appropriate.	In-progress and on-going as needed.	

Compliance Area	Action Item	Status	Additional Comments
2019 Action Items			
Status Report (IAS)	Prepare a status report on the progress of measures taken to implement the multi-year plan.	Complete in 2019	
Training	Continue to provide training as required. Continue to identify any additional AODA-related training needs for certain positions and provide additional training to identified positions as appropriate.	In-progress and on-going as needed.	
Accessible Website (IAS)	Take steps to ensure that Element's website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 Level AA by 2021.	TBD	Additional work to be performed will follow a website specific action plan as applicable.
Compliance Area	Action Item	Status	Additional Comments
2020 Action Items			
Accessibility Compliance Report (IAS)	File Additional Accessibility Compliance Reports as directed by the Ministry.		Due by 12/31/2020
Status Report (IAS)	Prepare a status report on the progress of measures taken to implement the multi-year plan.		
Training	Continue to provide training as required. Identify any additional AODA-related training needs for certain positions and provide additional training to identified positions as appropriate.	In-progress and on-going as needed.	

Accessible Website (IAS)	Take steps to ensure that Element's website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 Level AA by 2021.	TBD	Additional web-site specific action plan will identify next steps required, if any.
Compliance Area	Action Item	Status	Additional Comments
2021 Action Items			
Accessibility Compliance Report (IAS)	File Additional Accessibility Compliance Reports as directed by the Ministry, if any.		
Status Report (IAS)	Prepare a status report on the progress of measures taken to implement the multi-year plan, if any.		
Training	Continue to provide training as required. Identify any additional AODA-related training needs for certain positions and provide additional training to identified positions as appropriate.	In-progress and on-going as needed.	
Accessible Website (IAS)	Take steps to ensure that Element's website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 Level AA by 2021.		Web site and web content is to be compliant by 1/1/2021. Additional work to be performed will follow a web-site specific action plan, if needed.

3. Governance

Exceptions to this Program shall be reviewed and approved by SVP, Compliance and the VP, Human Resources. Questions regarding the appropriate interpretations of this Program shall be directed to the EHS Compliance Director. This Program shall be reviewed on a periodic basis or at the determination of upon change in applicable law, or in applicable business lines, products, processes or practices.

4. Document Change History

Subject: AODA Multi-Year Accessibility Plan Plan Owner: EHS Compliance Director	Page 7 of 8
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Version	Date	Changes
001	12/01/2017	Initial document
002	12/19/2017	Updated document, accessibility compliance report filing date