



## Multi-Year Accessibility Plan – AON Inc Accessibility for Ontarians with Disabilities Act

### Overview

With the goal to make Ontario accessible by 2025, the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA) in 2005. The regulations associated with the AODA’s “Integrated Accessibility Standards” require that AON establish, implement, maintain, and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the Act.

AON Inc. is committed to meet the accessibility needs of persons with disabilities in a timely manner and to comply with AODA and all of its standards. This multi-year plan outlines AON’s strategy to prevent and remove barriers to address the current and future requirements of the AODA.

In accordance with the requirements set out in the Integrated Accessibility Standards, AON Inc. will:

- Post this plan on its website;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

For more information or to contact us, please visit [www.aoninc.com/accessibility](http://www.aoninc.com/accessibility) or contact us at [accessibility@eoninc.com](mailto:accessibility@eoninc.com).

Multi-Year Accessibility Plan – AON Inc  
 Accessibility for Ontarians with Disabilities Act - Integrated Standards

<b>Part I – GENERAL REQUIREMENTS</b>		
<b>Establishment of Accessibility Policies</b>	<b>Actions</b>	<b>Status/ Due-Date</b>
<p><b>3.(1)</b> Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.</p>	<p>New policies developed and a variety of existing policies amended.</p>	<p>Complete</p>
<b>Accessibility Plans</b>		
<p><b>4.(1)</b> Large organizations shall,</p> <ul style="list-style-type: none"> <li>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</li> <li>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years.</li> </ul>	<p>Multi-year Accessibility Plan developed and posted on the Company's website.</p> <p>It will be provided in an accessible format upon request and will be reviewed and updated at least once every five years</p>	<p>Complete</p> <p>Ongoing</p>
<b>Training</b>		
<p><b>7.(1)</b> Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization's policies; and</li> <li>(c) all other persons who provide goods, services or facilities on behalf of the organization.</li> </ul>	<p>Training program complete and added to online education platform.</p>	<p>Complete</p>

<b>PART II – INFORMATION AND COMMUNICATIONS STANDARDS</b>		
<b>Feedback</b>		
<b>11.(1)</b> Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Feedback process created and posted on company website.	Complete
<b>Accessible Formats &amp; Communication Supports</b>		
<b>12.(1)</b> Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons. <b>12.(2)</b> The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. <b>12.(3)</b> Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Updated policy and process posted on website. To address formats and communication supports based on individual requests.	Complete/ Ongoing
<b>Accessible Websites &amp; Web Content</b>		
<b>14.(2)</b> Designated public sector organizations and large organizations shall make their internet websites 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, and shall do so in accordance with the schedule set out in this section.	New websites are compliant. Major revisions to existing websites will be compliant.	Complete  Ongoing
<b>PART III – EMPLOYMENT STANDARD</b>		
<b>Recruitment - General</b>		
<b>22.</b> Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes	Notice added to website, job ads and postings, and application forms.	Complete
<b>Recruitment, Assessment or Selection Process</b>		
<b>23.(1)</b> During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	Notice added to website, application correspondence including job postings, and application forms.	Complete

<p><b>23.(2)</b> If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>		Ongoing
<p><b>Notice to Successful Applicants</b></p>		
<p><b>24.</b> Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	Notice added to offer letters and related hiring policies	Complete
<p><b>Informing Employees of Supports</b></p>		
<p><b>25.(1)</b> Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	Communication to all employees by Human Resources Manager via payroll insert and various meetings.	Complete
<p><b>25.(2)</b> Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p>	Information added to new employee hire package.	Complete
<p><b>25.(3)</b> Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	Update employees as needed.	Complete/ Ongoing
<p><b>Accessible Formats &amp; Communication Supports for Employees</b></p>		
<p><b>26.1</b> In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.</p> <p><b>26.2.</b> The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	Updated policy and incorporated into IASR training.	Complete/ Ongoing
<p><b>Workplace Emergency Response Information</b></p>		
<p><b>27. (1)</b> Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p>	Requirements incorporated into Safety/Emergency Response and new employee orientation policies.	Complete/ Ongoing

<p><b>27. (2)</b> If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p><b>27. (3)</b> Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p><b>27. (4)</b> Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.</p>		
<b>Documented Individual Accommodation Plans</b>		
<p><b>28.(1)</b> Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p><b>28. (2)</b> The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</li> <li>5. The steps taken to protect the privacy of the employee's personal information.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ol>	<p>Manager of Human Resources to develop process and any related policies or forms based on individual circumstances. General process has been established/documented. Employer's obligation incorporated into IASR training.</p>	<p>Complete/ Ongoing</p>

<b>Return to Work Process</b>		
<p><b>29.(1)</b> Every employer, other than an employer that is a small organization, (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and (b) shall document the process.</p> <p><b>29. (2)</b> The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and (b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p><b>29. (3)</b> The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<p>Manager of Human Resources to develop process and any related policies or forms based on individual circumstances. General process has been established/documented. Employer's obligation incorporated into IASR training.</p>	<p>Complete</p>
<b>Performance Management</b>		
<p><b>30.(1)</b> An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<p>Policy updated and employer's obligation incorporated into IASR training.</p>	<p>Complete</p>
<b>Career Development &amp; Advancement</b>		
<p><b>31.(1)</b> An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<p>Policy updated and employer's obligation incorporated into IASR training.</p>	<p>Complete</p>
<b>Redeployment</b>		
<p><b>32.(1)</b> An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	<p>Human Resources manager to address based on individual circumstances.</p>	<p>As needed</p>