

Policy Date: June 5, 2026

Version 1.0

PART A – POLICY AND FRAMEWORK

1. Purpose:

McDonald Brothers Construction Inc. (MBC) is committed to ensuring that persons with disabilities have equal opportunity to access our services, facilities, and employment prospects. This policy establishes that MBC's obligations and commitments under Ontario's accessibility legislation and supports the goal of an accessible inclusive workplace and service environment.

This policy supports MBC's compliance with the Accessibility for Ontarians with Disabilities Act (AODA), the Ontario Human Rights Code, and all associated regulations, aligning with the principles of dignity, independence, integration, and equal opportunity for all individuals.

2. Policy Statement:

MBC is committed to providing an accessible environment for all clients, employees, subcontractors, and visitors. MBC will strive to identify, remove, and prevent barriers to accessibility where possible and practical. MBC will ensure that accessibility is embedded in its operations, employment practices, information and communications consistent with Ontario law. This commitment applies to MBC offices and worksites where applicable.

3. Accommodation to the Point of Undue Hardship:

MBC recognizes that its primary operations take place on active construction sites where it may not be possible, practical, or safe to accommodate some persons with some disabilities. Nevertheless, MBC is committed to identifying and removing barriers, making accommodations and serving our employees and stakeholders with disabilities wherever possible. Through continuous improvement, MBC's goal is to make meaningful changes where necessary to create as inclusive of a workplace as possible.

PART B – ACCESSIBILITY COMMITMENTS AND REQUIREMENTS

4. Customer Service Accessibility

MBC is committed to providing our services in a manner that respects the dignity and independence of persons with disabilities. The following practices apply wherever MBC interacts with its various stakeholders:

a. Assistive Devices

Persons with disabilities may use their own assistive devices when accessing MBC's services or premises. Where MBC provides assistive devices (e.g., accessible meeting

spaces, visual aids, owl meeting camera), staff will be trained on their availability and proper use.

b. Service Animals

MBC welcomes people with disabilities who are accompanied by a service animal on MBC premises that are open to the public. Service animals are permitted in all areas accessible to the public except where legally excluded by other applicable laws. Where a service animal is excluded by law, MBC will provide alternate means of access to services.

c. Service Persons

Persons with disabilities may be accompanied by a support person when accessing MBC services or attending MBC-hosted meetings or events. MBC will not prevent a support person from accompanying an individual with a disability, subject to any health and safety policies and requirements for attending our active construction sites (i.e. Personal Protective Equipment (PPE), etc...). Where admissions fees apply to MBC-hosted events, MBC will provide advance notice of any fee applicable to support persons.

d. Notice of Temporary Disruptions

In the event of a planned or unexpected disruption to services or facilities used by persons with disabilities (e.g., accessible meeting rooms ground floor), MBC will provide timely notice. Notices will include the reason for the disruption, anticipated duration and a description of alternative facilities or services available. Notices will be posted at the affected location and communicated through available channels.

e. Feedback Process

MBC welcomes feedback on how we provide our services to persons with disabilities. Feedback may be submitted in person, by telephone, in writing, or by email to the VP Finance. Once feedback is received, MBC will acknowledge receipt within 5 business days and provide a response within 15 business days.

5. Information and Communications Accessibility

MBC is committed to providing accessible information and communications to all persons, including persons with disabilities.

a. Accessible Formats and Communication Supports

Upon request, MBC will provide information and communications in accessible formats or with appropriate communications supports. Accessible formats and communication supports will be provided in a timely manner and at no additional cost. MBC will consult with the person making the request to determine the most suitable accessible format or support.

b. Website and Digital Communications

New and significantly refreshed MBC public-facing website content will conform to the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA as required to the extent technically feasible. MBC will work to ensure that digital documents and communications used in employment and service delivery are accessible or that accessible alternatives are provided upon request.

c. Emergency and Public Safety Information

MBC will provide emergency and public safety information in accessible formats to persons with disabilities, upon request.

6. Employment Accessibility

MBC is committed to fair, accessible, and inclusive employment practices at all stages of the employment lifecycle as well as the equitable treatment toward all current or prospective employees, regardless of disability.

a. Recruitment and Selection

MBC will notify applicants in job postings that accommodations are available for persons with disabilities during the recruitment process. When a candidate is selected for an interview or testing, MBC will notify them that accommodations are available and will provide the accommodation upon request. If a candidate selected for hire requires an accommodation, MBC will consult with the candidate to arrange the accommodation. Terms of employment including salary, benefits and career potential shall be the same for all applicants regardless of disability.

b. Employee Accommodation Plans

MBC will maintain a written process for developing individualized accommodation plans for employees with disabilities. Accommodation plans will be developed collaboratively with the employee and include:

- The manner in which MBC has assessed and determine the accommodation measures.
- Any information regarding accessible formats or communication supports required by the employee
- Any other accommodation measures to be provided
- A schedule for the plan's implementation and a process for review and update

Plans will be reviewed when an employee's accommodation needs change, when the employee returns from leave, or at the employee's request. The VP Finance is responsible for developing and maintaining all accommodation plans.

c. Return-to-Work Process

MBC maintains a documented return-to-work process, consistent with our Health and Safety Program (MBC-HR-POL-006 Return-to-Work and Modified Duties Policy). This process addresses the return of employees who were absent due to a disability and may

require accommodation or modified duties upon return. The return-to-work process is consistent with and does not replace or limit any other return-to-work processes required under any other applicable law.

d. Performance Management and Career Development

MBC will consider the accessibility needs of employees with disabilities when conducting performance management or providing career development opportunities. Accommodation plans will be considered as part of these processes to ensure equal opportunity. Such considerations / plans shall not impede an employee with disabilities from career growth or advancement that is afforded to any other employee.

e. Workplace Emergency Response Information

MBC will provide individualized workplace emergency response information to employees with disabilities, as soon as practicable after becoming aware of the disability related need, where the disability is such that the individualized information is necessary. Emergency response information will be prepared with the employee's input and shared with designated persons who may assist in an emergency, with the employee's consent.

7. Built Environment and Physical Accessibility

MBC is committed to identifying and removing physical barriers in our place of work consistent with the Ontario Building Code and applicable IASR design of Public Spaces Standards as they apply to MBC's head office location. MBC is also committed to making reasonable accommodations on our active construction sites where possible, reasonable, practical and safe to do so.

a. Barrier Identification and Removal

MBC will proactively identify physical barriers on its premises and project sites through periodic site assessments. Accessibility barriers will be reviewed periodically during inspections and when new offices, facilities, or project sites are established. Identified barriers will be documented in MBC's Multi-Year Accessibility Plan with assigned timelines for removal or mitigation. Where immediate removal is not practical, interim measures will be implemented.

b. Accessible Workplaces

When establishing or modifying MBC office spaces or site facilities (e.g., site trailers, portable washrooms), MBC will consider accessibility requirements and accommodate the needs of employees and visitors with disabilities to the extent that this accommodation does not place undue hardship on MBC.

c. Construction Site Considerations

MBC recognizes that active construction sites have inherent physical limitations including uneven ground, volume of noise, scaffolding, open excavation, etc... The health and safety of personnel on our sites will always take a priority over all other

activities. While MBC will ensure that reasonable accommodations will be taken to provide accessibility to employees and stakeholders with disabilities who need to access or traverse on of our construction sites, MBC acknowledges that, in some circumstances, it may not be possible or practical to do so and would otherwise place undue hardship on the Firm.

8. Training

MBC will provide training to all employees and persons who develop MBC's policies, and to all others as may be required.

Training will be provided using accessible formats and methods as appropriate. The VP Finance will maintain records of all training completed, including the dates of training, the names of persons trained, and the content provided.

PART C – ONGOING MANAGEMENT

9. Documentation and Record Keeping

All accessibility records shall be stored on MBC's private servers. Records will be made available upon request and to applicable regulatory bodies as required by law.

10. Policy Review

This policy will be reviewed every three years, or more frequently if:

- There is a change in applicable Ontario accessibility legislation or regulations.
- A significant change in MBC's operations, workforce size, or premises occurs.
- An accessibility barrier or compliance gap is identified through feedback, audit, or inspection.
- An accommodation request reveals a gap in existing policy or practice.

Policy reviews are the responsibility of the VP of Finance. Updated versions of this policy will be posted and communicated to all affected persons. The Multi-Year Accessibility Plan will be updated to reflect any changes in MBC's commitments or timelines.

Policy executed by:



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