

Accessibility Policy - AODA (Accessibility for Ontarians with Disabilities Act)

Policy #	PHR-150
Issue Date	December 8, 2023
Revision #	001
Revision Date	June 2025

1. Policy Statement

The AODA (Accessibility for Ontarians with Disabilities Act) has been developed to reduce and remove barriers for people with disabilities so that Ontario can become more accessible and inclusive for everyone. This accessibility policy reviews NT Power's initiatives to meet the AODA standards.

2. Purpose

The purpose of this policy is to outline NT Power's comprehensive commitment to accessibility for employees, customers, visitors, and all individuals we serve. This policy ensures that all goods, services, employment practices, facilities, and communications are accessible and inclusive.

3. Scope

This policy applies to all employees from a personal standpoint, and for anyone who deals with members of the public or other third parties on behalf of NT Power, whether the person does so as an employee, member of the Board of Directors, agent, volunteer, student on placement, or otherwise.

4. Policy

We are committed to achieving a barrier-free environment for our customers, community, and employees, while providing quality goods and services that are accessible to all persons we serve.

If anyone has a question about these policies, or if the purpose of a policy is not understood, an explanation will be provided by the Human Resources Department.

This policy covers two specific areas:

1. Accessible Customer Service
2. Integrated Accessibility Standards

1. Accessible Customer Service Policy

In accordance with The Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") this section addresses:

The Provision of Goods and Services to Persons with Disabilities

We are committed to providing quality goods and services that are accessible to all persons we serve. We will use reasonable efforts to ensure that policies, practices, and procedures are consistent with the following principles.

- Goods and services are provided in a manner that respects the dignity and independence of people with disabilities,
- Provision of goods and services to people with disabilities are integrated with those provided to people who do not have disabilities, unless an alternative measure is necessary to enable a person with a disability to obtain, use, or benefit from our goods and services,
- People with disabilities are given an opportunity equal to that of people without disabilities to

- obtain, use or benefit from our goods and services,
 - When communicating with a person with a disability, we will do so in a manner that considers the person's disability.

Assistive Devices and other Measures that Assist with Accessibility

A person with a disability may provide their own assistive device for the purpose of obtaining, using, and benefiting from our goods and services. Exceptions may occur in situations where we have determined that the assistive device may pose a risk to the health and safety of a person with a disability, or the health and safety of others on the premises.

In these situations, and others, we may offer a person with a disability other reasonable measures to assist them in obtaining, using, or benefiting from our goods and services, where we have such other measures available. It should be noted that it is the responsibility of the person with a disability to ensure their assistive device is operated in a safe and controlled manner at all times.

Service Animals

People with a disability may enter premises owned and operated by NT Power, accompanied by a service animal, and may keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, we shall ensure that alternate means are available to enable the person with a disability to obtain, use, or benefit from our goods and services.

If it is not readily apparent that the animal is a service animal, we may ask the person with a disability for a letter from a physician or nurse confirming the person requires the animal for reasons relating to their disability. We may also, or instead, ask for a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school. It is the responsibility of the person with a disability to ensure that their service animal is kept in control at all times.

Support Persons

A person with a disability may enter premises owned and operated by NT Power with a support person and have access to the support person while on the premises.

We may require a person with a disability to be accompanied by a support person while on our premises, in situations where it is necessary to protect the health or safety of the person with a disability, or the health and safety of others on the premises. A support person, when assisting a person with a disability to obtain, use or benefit from our goods and services, will be permitted.

Notice of Temporary Disruptions in Services and Facilities

We are aware that the operation of our services and facilities is important to the public. However, temporary disruptions in services and facilities may occur due to reasons that may or may not be within our control or knowledge.

We will make reasonable efforts to provide notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if applicable. We will make reasonable effort to provide prior notice of planned disruption, if possible, recognizing that in some circumstances, such as in the situation of unplanned temporary disruption, advance

notice will not be possible. In such cases, we will provide notice as soon as possible.

When temporary disruptions occur to our services or facilities, we will provide notice by posting the information in visible places, on our website (www.ntpower.ca), via social media, or by any other method that may be reasonable under the circumstances, as soon as reasonably possible.

Training

We will ensure that all persons to whom this policy applies understand the Accessibility Standards for Customer Service. The amount and format of training given will be tailored to suit each person's interactions with the public.

Feedback

We are committed to providing high quality goods and services to all members of the public we serve. Feedback from the public is welcomed as it may identify areas that require change and encourages continuous service improvements. Feedback from a member of the public about the delivery of goods and services to people with disabilities may be given by telephone, in person, in writing, in electronic format or through other methods. Information about the feedback process is available to the public and notice of the process is posted on our website (www.ntpower.ca) and/or in other appropriate locations.

Availability and Format of Documents Required by the Accessibility Standards for Customer Service (Ontario Regulation 429/07)

- a) All documents required by the Accessibility Standards for Customer Service, including our accessibility policy, notices of temporary disruptions, and written feedback process are available upon request, subject to MFIPPA.
- b) When providing a document to a person with a disability, we will provide the document or the information contained in the document, in a format that takes the person's disability into account to meets their needs.
- c) Notice of the availability of all documents required by the Accessibility Standards for Customer Service is posted on our website, and available through our Corporate Communications Department.

2. Integrated Accessibility Standards

This second section has been established by NT Power to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *AODA Act, 2005*.

Statement of Commitment

NT Power is committed to treating all people in a way that allows them to maintain their 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 the Accessibility for Ontarians with Disabilities Act. This will be implemented in accordance with the time frames established by the Regulation. These standards are developed to break down barriers and increase accessibility for people with disabilities in the areas of information, communications and employment.

Accessibility Plan

We will develop, maintain, and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from our workplace and to improve opportunities for people with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the company's website. Upon request, we will provide a copy of the Accessibility Plan in an accessible format.

Accessibility Training

We will ensure training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to people with disabilities, to

- Employees and volunteers.
- All people who participate in developing NT Power's policies.

The training will be appropriate to the duties of the employees, volunteers, and other people. Employees will be trained when changes are made to the accessibility policy. New employees will be provided with an AODA overview and access to review this policy.

Information and Communication Standards

Feedback - we will continue to ensure our process for receiving and responding to feedback is accessible to people with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports - upon request, we will provide or will arrange for the provision of accessible formats and communication support for people with disabilities in a timely manner that considers the person's accessibility needs due to disability. We will consult with the person making the request to determine an accessible format or communication support. We will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content - we will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA, except where this is impracticable.

Employment Standards

Recruitment, Assessment or Selection Process

We will notify our employees and the public about the availability of accommodation for applicants with disabilities in our recruitment process. If a selected applicant requests accommodation, Human Resources will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

Employees

Supports - We will continue to inform employees of policies and procedures to support employees with disabilities, including the provision of job accommodations that consider an employee's accessibility needs due to disability.

Accessible Formats and Communication Supports for Employees - Upon the request of an employee with a disability, we will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform their job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, we will consult with the employee making the request.

Workplace Emergency Response Information - we will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if we are aware of the need for accommodation due to the employee's disability. We will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, we will, with the consent of the employee, provide the workplace emergency response information to the person designated by NT Power to help the employee. We will review the individualized workplace emergency response information when the employee moves to a different location in the organization and/or whenever the employee's overall accommodation needs or plans are updated.

Documented Individual Accommodation Plans - we will prepare individual accommodation plans for employees with disabilities as needed. If requested, information regarding accessible formats and communications supports provided will be included in the plan. The plan will include individualized workplace emergency response information, where required, and will identify any other accommodation that is to be provided.

Return to Work Process – we have a return-to-work process for employees who have been absent from work, and we discuss any disability-related accommodations required to be able to return to work. This includes modified work offers as necessary. This return-to-work process will not replace or override any other return-to-work process created by or under any other statute (i.e. the *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment

We will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement, or when redeploying employees.

5. Document History

Approval and Amendment History	Details
Original Approval Authority and Date	VP Customer and Employee Experience
Amendment Authority	VP Customer and Employee Experience
Document Owner	Manager People & Culture
Last Board Review, as applicable	

Revision History		
Rev#	Date	Details of Changes
	December 8, 2023	Issue date
	June 2025	Expanded on the purpose of the policy and made grammatical corrections.