



Subject: Multi-Year Accessibility Plan (HS 4C)

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Version: 1

Multi-Year Accessibility Plan

Intent

This plan is intended to increase accessibility at Canusa Automotive Warehousing Inc.'s ("Canusa" or the "Company") work locations and foster a safe, dignified and welcoming environment for everyone. This plan summarizes the actions the Company has taken and will take towards removing and preventing barriers for individuals with disabilities in the workplace and for customers accessing our public Auto Parts Centres (APC) store locations. This plan is in compliance with all Ontario accessibility laws and *Regulation 191/11* and outlines how Canusa will communicate such information internally and externally.

Scope

This policy applies to all individuals who work at Canusa Automotive Warehousing Inc., including full-time and part-time employees, temporary employees, contract service providers, contractors, all supervisory personnel, managers, officers and directors. It also applies to any customers, visitors or other people accessing Canusa's property.

Statement of Commitment

Canusa is committed to creating accessible workplaces and Auto Parts Centres (APC) store locations, and ensuring a safe, respectful and welcoming environment for everyone. The Company will ensure equal access and participation for people with disabilities, allowing individuals to maintain dignity and independence.

Canusa believes in integrating and meeting the needs of individuals with disabilities in a timely manner. Accommodations will be made by removing and preventing barriers to accessibility and meeting the accessibility requirements under Ontario's accessibility laws. The Company regularly reviews policies, procedures, plans and training programs to ensure all employees are knowledgeable in how to properly assist individuals with disabilities when necessary.

Definitions

<u>Accommodation</u>: the removal of obstacles and barriers to accessibility for customers in a manner that preserves personal dignity. Accommodation may be temporary or permanent

<u>Disability</u>: as defined by the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), and the Code:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness
- A condition of mental impairment or a developmental disability

- A learning disability or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- A mental disorder
- An injury or disability for which benefits have been claimed or received under the Workplace Safety and Insurance Act, 1997 (WSIA)

Assistive Device: a technical aid, communication device or another instrument that is used to maintain or improve the functional abilities of individuals with disabilities. Personal assistive devices typically assist individuals with disabilities with hearing, seeing, communicating, moving, breathing, remembering or reading. Examples of assistive devices include but are not limited to a wheelchair, walker, or personal oxygen tank (this list is non-exhaustive)

<u>Guide Dog</u>: a highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety and increased independence for individuals who are visually impaired

<u>Service Animal</u>: as defined in *Ontario Regulation 429/07* under the AODA, an animal is considered a service animal for an individual with a disability if:

- It is readily apparent that the animal is used by the individual for reasons relating to a
 disability
- If the individual provides a letter from a healthcare professional stating the requirement to have the animal present for reasons relating to a disability

<u>Support Person</u>: as defined in *Ontario Regulation 429/07* under the AODA, another person, in relation to the individual with a disability, who accompanies the individual to help with communication, mobility, personal care, medical needs or access to goods and services

<u>Undue Hardship</u>: may occur where it is established that no forms of appropriate accommodation exist, where the creation of accommodation would cause excessive costs for the organization, or where the accommodation would create a health and safety hazard

Training

All employees will receive training on the *Accessibility for Ontarians with Disabilities Act* (AODA) at the time orientation is completed. This training must be reviewed regularly, and repeated as needed, or as the procedure changes. Training records will be maintained by the Human Resources Department.

Current Commitments

Emergency Response Plans

If Canusa is informed that an individual with a disability requires an individualized emergency response plan, the plan will be created in collaboration with the individual, and the information will be provided to the applicable individuals once it is completed.

Communication Standards

Accessible customer feedback is available through multiple channels. Feedback can be provided through mail, email, in person and by telephone. Canusa strives to ensure that websites and web content are accessible to all individuals. When the Company website is undergoing an update or review, consideration is made for individuals with disabilities and the *Web Content Accessibility Guidelines* (WCAG).

The Canusa website has a copy of the Company's *Customer Accessibility for Ontarians with Disabilities Act* (AODA) *Policy (HS 4B)* and *Privacy Policy (HR 5)* posted, in accordance with the *Information and Communication Standards* under the *Integrated Accessibility Standards Regulation* (IASR). This *Multi-Year Accessibility Plan (HR 4C)* will also be posted on the Company website.

Design of Public Spaces

Canusa takes preventative measures regarding accessibility for people with disabilities. Good housekeeping is one of the Company's priorities. Workers are reminded of the importance of keeping all areas of the workplace clean and free of debris. Maintaining a clean workplace allows access for individuals who need more space, and prevents slips, trips or falls.

The Company continuously prioritizes any necessary repairs to Canusa-owned and operated property. Canusa conducts regular maintenance on all equipment and areas to avoid emergency repairs. The Company also conducts regular maintenance of all equipment and premises to reduce the risk of injury and ensure compliance with accessibility standards.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within Canusa's control or knowledge. In the event of any temporary disruptions to facilities or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in a situation of unplanned temporary disruptions, advance notice may not be possible.

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable
- The reason for the disruption
- Anticipated duration
- A description of alternative services or options

When disruptions occur, Canusa will provide notice by posting notices in conspicuous places, including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Canusa website, or by any other method that may be reasonable under the circumstances.

Accessibility Standard for Customer Service

Canusa has implemented a *Customer AODA Policy (HS 4B)* that ensures individuals with disabilities are treated with the same respect and dignity as everyone else. The Company has implemented training for all employees on how to interact with individuals with disabilities and any guide dogs, support animals or support persons. Canusa implements AODA training

through online courses that are mandatory for all employees upon hire. All training related to AODA, including the *Accessibility Standard for Customer Service*, will be reviewed regularly and repeated as needed.

Employment Standard

Canusa is committed to a recruitment process that is fair and accessible to all individuals. The Company ensures all job applicants understand that accommodations are available for individuals with disabilities.

When an employment agreement is presented, the Company's AODA policies are communicated to the candidate. Successful job applicants involved in the onboarding and orientation process with Canusa must complete AODA courses online, which include an employment standards module.

Updates are provided to all employees regarding any changes to the AODA and the applicable Company policies and procedures.

Return to Work

Canusa's *Return-to-Work Policy (HS 9)* includes a commitment to developing individual accommodation plans for employees with disabilities. All information documented in employee return-to-work plans is kept confidential and shared only on a need-to-know basis.

Please refer to the Return-to-Work Policy (HS 9) for more information.

Performance Management and Career Development

Canusa recognizes individual accessibility needs when providing performance management, career development and career advancement opportunities for individuals with disabilities.

Feedback

Customer feedback is welcomed and appreciated. Customers can provide feedback through multiple forms of communication: online, by telephone, in person, and through mail or email. Canusa collects and analyzes all feedback and uses the information to identify gaps in accessibility.

Future Commitments

Canusa is committed to achieving a workplace without barriers for individuals with disabilities. Ongoing AODA training will be provided to employees to increase awareness and knowledge regarding disabilities and how to interact with individuals who have disabilities.

Canusa will continue to consider accessibility and potential barriers to accessibility when updating Company-owned premises and constructing new buildings.

The Company is committed to utilizing customer feedback to improve accessibility and create a barrier-free environment.

Canusa strives to keep the Company websites and web content accessible to all individuals. When updates or reviews are completed for the Company website, in accordance with the WCAG, individuals with disabilities are continuously considered. Canusa is continually working to make the Company's websites more accessible by providing assistive devices for individuals who are hard of hearing or visually impaired.

Canusa will continue to make clear in all job postings, during the onboarding and orientation process, and throughout employees' employment that accommodations are available for individuals with disabilities upon request.

Accessibility concerns will continue to be identified throughout the workplace, and plans will be made to implement any required steps to reduce barriers to accessibility on Company-owned and operated premises.

Communication

Canusa's goal is to meet and exceed the expectations of individuals with disabilities. In the event that an employee or a customer requesting accommodation feels that the needs have not been met in a reasonable manner, a written complaint may be submitted to the Human Resources Department (hr@canusa-apc.com), outlining the customer's concerns and suggestions for improvement.

PLANS	ACTIONS	2024	2025	2026
Regulations	Ensure compliance with all AODA requirements	✓	✓	✓
Recruitment	Clear communication of availability of accommodations during the recruitment process and during employment	✓	V	√
Career Development and Advancement	Ensure all employees are not discriminated against and are given the opportunity for development and advancement	✓	✓	√
Design of Public Spaces	The addition of an elevator to the headquarters so all floors are easily accessible	√	√	√
	When designing new public spaces, Canusa will ensure that all areas are in compliance with the AODA	✓	V	√
Internal Policies and Procedures	Complete the <i>Multi-Year Accessibility Plan</i> . Make the plan available on the Company website and communicate it to all workers	✓	~	√
Accessible Formats	Ensure accessible document formats are provided upon request, and requests can be made in a variety of formats	✓	V	√
Accessible Web Content	Ensure that when new web content is uploaded, it is made accessible for individuals with visual or hearing impairments	✓	~	✓
Communication of Available Supports	Send out regular communications in various formats to ensure employees know of the available supports offered by the Company	✓	✓	✓
Documentation of Individual Accommodation Plans	When employees come forward with an accommodation request, the Company will work with the individual to ensure the needs are met through an individualized accommodation plan and that this plan is documented and kept confidential	✓	✓	✓
Accessibility Compliance Report	Canusa will ensure to submit an accessibility compliance report every three years, as required by law, to ensure compliance with the AODA		✓	√
Return to Work	The Company will review and update the Return-to-Work Policy (HS 9) regularly to ensure it does not discriminate against individuals and offers appropriate accommodations to employees with disabilities	✓	✓	✓