



Circular Materials' Ontario Accessibility Policy and Multi-Year Accessibility Plan (2022-2026)

Last Updated April 2024

1. Introduction

Circular Materials is committed to developing, implementing, and maintaining policies that govern how the organization achieves or will achieve accessibility to meet this Regulation. To facilitate this commitment, CM has established, maintained, and documented a multi-year accessibility plan, that is reviewed and updated at least once every five years to identify progress made in addressing barriers and will be posted on the CM website and Intranet.

This Accessibility Policy and Multi-Year Accessibility Plan outlines the actions that Circular Materials has and will put in place to improve opportunities for people with disabilities in accordance with the *Integrated Accessibility Standards (IASR)* under the *Accessibility for Ontarians with Disabilities Act, 2005* (the "Act" or "AODA"). In accordance with the requirements set out in the IASR, we will:

- Post our Multi-Year Accessibility Plan on our www.circularmaterials.ca website;
- Review and update the plan at least once every five years;
- Provide the plan in an accessible format upon request; and
- Prepare a biannual status report and post it on our website.

2. Scope

This policy and plan apply to Circular Materials' operations in the province of Ontario.

3. Statement of Commitment

Circular Materials 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 to eliminate barriers and improve accessibility under the AODA and the IASR. Our statement of commitment is publicly available on our website (www.circularmaterials.ca).

4. Emergency Information and Procedures

Circular Materials strives to ensure that our facilities are safe for clients, visitors, and employees. The Property Manager at Circular Materials leased facilities provides building-related emergency procedures and plans and public safety information in an accessible format, which is available to all employees upon request. Circular Materials will also provide individualized workplace emergency response information to employees with disabilities who need assistance during an emergency.



Actions taken and ongoing:

- Review emergency procedures at all Circular Materials offices.
- Ensure that property managers can provide building-related emergency and public safety information in an accessible format, upon request.

Goals:

- Provide building emergency and public safety information in an accessible format upon request, as soon as possible, on behalf of the Property Manager.

5. Training

Circular Materials has provided, and will continue to provide, training to employees and volunteers, who provide goods, services or facilities on behalf of Circular Materials, on the requirements set out in the *Integrated Accessibility Standards* and on the *Ontario Human Rights Code* as it relates to people with disabilities.

Training will be provided in a way that best suits the duties of the applicable employee, within 30 days after staff commence their duties or as soon as practicable. A record of this training will be kept, including the dates on which training is provided and the number of individuals to whom it is provided.

Actions taken and ongoing:

- Ensure all new Ontario-based staff take the required AODA training.
- Confirm all current Ontario-based staff have taken the required AODA training.
- Add customer service standard training to the onboarding/orientation process for all externally facing staff.
- Maintain written training records that include when the training was delivered, who attended, and how many people took the training.
- Institute a refresher training cycle to be repeated every five years or as changes are made to policies pursuant to the *Integrated Accessibility Standards*, to ensure knowledge remains current.
- Implement a mechanism to track when staff are due to repeat training.

Goals:

- Continue to provide AODA training to new staff and to refresh training for existing staff every five years.
- Continue to maintain written training records for all staff, including names and completion dates.

6. Accessible Formats and Communication Support



Circular Materials is committed to meeting the communication needs of people with disabilities. The information we provide and the ways we communicate are key to delivering our programs and services to the public.

We will take reasonable steps to ensure that all publicly available information controlled by Circular Materials is provided in an accessible format upon request. Circular Materials will also consult with the person making the request to determine his or her information and communication needs.

Circular Materials will notify the public about the availability of accessible formats and communication supports, including with respect to the feedback process, by posting a notice on their website.

Actions taken and ongoing:

- Develop accessible customer service feedback process and institute mechanisms for feedback such as phone, mail, email and web form submission.
- Develop a process to ensure information can be made accessible to people with disabilities upon request via accessible formats and communication supports
- Assistive technology, speciality keyboards and mice, and ergonomically designed workstations and components available upon request.

Goals:

- Continually improve the accessibility of our information and communications by reviewing feedback received and addressing through prompt implementation to reduce and/or eliminate accessibility barriers.
- Continue to use the accessible feedback and request mechanism as a means for enabling people with disabilities to request accessible formats or communication supports.

7. Accessible Websites and Web Content

Circular Materials will take reasonable steps to ensure that all Ontario based websites controlled by Circular Materials, and content on those sites published after January 1, 2012, conforms with WCAG 2.1 Level AA (other than live captions and pre-recorded audio descriptions), except where meeting the requirement is not practicable.

Actions taken and ongoing:

- Test all websites controlled by Circular Materials to identify existing accessibility issues and develop a plan to fix them.
- Continue to meet or exceed adherence to Level AA of the Web Content Accessibility Guidelines (WCAG 2.1) of the Worldwide Consortium.
- Become fully compliant with assistive accessibility software, with special consideration to that used by Circular Materials.



- Add alt text to all images on Circular Materials' websites and social media.
- Add closed captioning to all videos on Circular Materials' websites and social media.
- Ensure all forms conform to accessibility standards.
- Create an accessibility page on Circular Materials' website that will house Accessibility Policies, Multi-Year Accessibility Plan, and feedback process, living within an Accessibility menu that also contains Terms of Service, Site Map, and Privacy Policy.
- Create site map.

Goals:

- Ensure all external websites controlled by Circular Materials comply with WCAG 2.2, Level AA, except where meeting the requirement is not practicable.
- Establish a procedure to continually ensure websites and web content conform to the current applicable standards.

8. Employment Standards

Circular Materials is committed to providing fair and accessible employment practices.

We are an equal-opportunity employer and are committed to inclusive and accessible employment practices that attract and retain talented employees with disabilities. We recognize that by removing barriers across the employment life cycle we will create a workplace that is diverse and accessible and that enables employees to reach their full potential.

Actions taken and ongoing:

- Processes have been established to consult with applicants who request an accommodation in a manner that considers the applicant's unique abilities.
- Circular Materials' careers page and job postings include the following statement about the availability of accommodations for disabilities, where needed, to support their participation in recruitment processes:
We prioritize diversity and equity throughout the recruiting, hiring, and onboarding process. Circular Materials is committed to being an inclusive and barrier free workplace that will accommodate Ontario applicants with disabilities, where needed and upon request, as set out in the Accessibility for Ontarians with Disabilities Act (AODA). Should you require individualized accommodation through any stage of the recruitment process, please contact us.
- Develop individual accommodation plans for employees with disabilities.
- Develop and put in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Goals:



- Continue to address and remove barriers to recruitment and to new employees once hired.
- Continue to accommodate employees and external candidates throughout the employment process.

9. Design of Public Spaces

Safety is a priority for Circular Materials, and we strive to ensure that our workplaces are safe for employees, clients, and visitors. Circular Materials will meet the Design of Public Spaces Standards when building or making major modifications to its public facilities and ensure that all employees, clients, and visitors have access to emergency response information.

Actions taken and ongoing:

- Learn and record how our facilities adhere to the requirements in the Ontario Building Code and the Integrated Accessibility Standards Regulation.
- Develop individualized workplace emergency response information to accommodate the needs of employees, clients, and visitors with disabilities.

Goals:

- Improve physical accessibility in all Circular Materials' office spaces.
- Incorporate the technical requirements established under the AODA Design of Public Spaces Standards into the design of any future newly constructed or significantly renovated facilities.
- Continue to work with Property Managers at all Circular Materials office spaces to ensure communication of temporary disruptions related to accessible elements within our public spaces.

10. Accessible Customer Service

Circular Materials strives for customer service excellence in all our interactions with our customers and residents. We have identified barriers to accessibility and appropriate ways to accommodate stakeholder needs to provide customer service that is accessible to all people with disabilities.

Actions taken and ongoing:

- Train employees and representatives (persons who participate in developing CM policies, volunteers, agents, contractors, clients, etc.) on Ontario's two accessibility laws and the Ontario Human Rights Code as it relates to people with disabilities. All new employees must complete training within 30 days of employment. All training is provided in a way that best suits the duties of our employees.
- Maintain records of all accessibility training, including participants' names and dates of completion.



- Ensure support for assistive devices, support persons, and service animals are available at all Circular Materials locations in areas where people interact with us in person.
- Provide customers with documents related to the Customer Service Standards and support mechanisms for making materials accessible upon request.
- Share documents and support mechanisms in conspicuous spaces owned and operated by Circular Materials, our website, and all other reasonable methods of notice.

Goals:

- Train all staff on how to interact with customers of all abilities.
- Ensure training is provided on an ongoing basis to include revisions pursuant to Ontario's two accessibility laws and the Ontario Human Rights Code as it pertains to people with disabilities.
- Continue enabling customers to use assistive devices and welcoming the assistance of service animals and support persons.
- Develop procedures to ensure customers with disabilities are assisted during temporary disruptions to facilities or services, making reasonable efforts to provide advance notice by posting notices in conspicuous places, contacting customers with appointments, verbally notifying customers, and other methods reasonable under the circumstances.
- Develop accessible online forms.

11. Feedback Process

Circular Materials has taken, and will continue to take, reasonable steps to ensure that its existing feedback process are accessible to people with disabilities upon request. Feedback on how services are delivered to people with disabilities is invited, forwarded to the appropriate employee, responded to, documented, and tracked. Feedback will be accepted in accessible formats and with other communication supports as required.

Actions taken and ongoing:

- Implemented an accessible customer service feedback process. Feedback can be provided by phone, email, mail, or web submission.
- Prepare biannual accessibility status reports that describe how we have met our goals and commitments and the legislative requirements as laid out in this plan. The reports will be available on our website and will be provided in accessible formats upon request.
- Monitor and evaluate any feedback related to accessibility received throughout the year. These insights will be used to continuously improve our processes and may be integrated into our accessibility reports and/or revisions to our multi-year accessibility plan.

Goals:

- Continue to use the feedback process as a means for improving services to people with disabilities.



12. Contact Information

For more information about this accessibility policy and plan, to provide feedback, or if you would like to make a request under this accessibility policy and plan, please contact us at:

Circular Materials ATTN: People and Culture
1 St. Clair Avenue West, Suite 700
Toronto, ON M4V 1K6

humanresources@circularmaterials.ca

Phone: 1-877-667-2626

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Accessible formats of this document are also available upon request. There is no charge to receive this document in an accessible format.