



AODA – Statement of Commitment to Accessibility

June 1, 2021

Sarmazian Brothers Ltd is committed to providing a barrier-free environment for all stakeholders, including our clients, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations.

Sarmazian Brothers Ltd understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and we are committed as an organization to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans, and training programs, please contact Tina Sarmazian .

Sincerely,

Sarmazian Brothers Limited Management



AODA – Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR)

Intent

This accessibility plan outlines the policies and actions that Sarmazian Brothers Ltd. will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the [Integrated Accessibility Standards, Ontario Regulation 191/11](#).

Statement of Commitment

Sarmazian Brothers Ltd. believes in equal opportunity and is committed to providing a barrier-free environment that allows all people to maintain their independence and dignity. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)* and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

Accessibility Requirement	Status	Responsibility
<p data-bbox="191 938 415 971">Customer Service</p> <p data-bbox="212 995 684 1027"><i>Accessible Customer Service Policy</i></p> <ol data-bbox="212 1032 1318 1255" style="list-style-type: none"> <li data-bbox="212 1032 1318 1092">1. Develop and implement an Accessible Customer Service Policy addressing all requirements under the regulation. <li data-bbox="212 1097 1318 1190">2. Develop and deliver training to all staff, volunteers, and individuals completing work on behalf of Sarmazian Brothers Ltd. that may provide assistance to the public. Provide training to all new staff. <li data-bbox="212 1195 1318 1255">3. Develop and make public a process for receiving and responding to feedback from customers with disabilities. 	<p data-bbox="1440 1092 1593 1157">Completed/ Ongoing</p>	<p data-bbox="1646 995 1881 1076">Human Resources/ Department Managers</p>



Sarmazian Brothers Ltd.’ Action Plan

1. Sarmazian Brothers Ltd. has developed and implemented an Accessible Customer Service Policy specific to the organization. This policy is updated and maintained by management.
2. Online training as well as a refresher course have been developed and delivered to all current staff. All new staff are required to participate in and complete an online AODA Customer Service Training* within their first month of employment with the company. Certification/record of completed training is retained by the company.
3. Sarmazian Brothers Ltd. has developed and made public a process for receiving and responding to feedback from customers with disabilities. The feedback process is inclusive of multiple means by which feedback can be received, including by phone, in-person, by email and by written correspondence. Client-facing employees have been informed of and trained on the company’s feedback process.

**Alternative formats of the AODA Customer Service Training are also available upon request, including in-person presentations.*

Accessibility Requirement	Status	Responsibility
General Requirements		
<p><i>Accessibility Policies</i></p> <ol style="list-style-type: none"> 1. Create and make public a statement of commitment. 2. Develop and implement company-specific accessibility policies. 	Completed/ Ongoing	Human Resources
<p><i>Sarmazian Brothers Ltd.’ Action Plan</i></p> <ol style="list-style-type: none"> 1. Sarmazian Brothers Ltd. has created and made public a statement of commitment. The statement of commitment is located on the company’s website and in the reception area of our office. 2. Sarmazian Brothers Ltd.’ policies and procedures have been reviewed to identify current and future barriers to accessibility. Identified barriers have been addressed and policies amended. Legislatively required policies have been created, are reviewed annually, and provided to all new hires upon hire. 3. Additional policies and documents have been created to support internal processes, including: Return to Work Policy, Individualized Employee Accommodation Planning Process, Individualized Employee Accommodation Plan, and Workplace Emergency Response Information Plan. <p><i>* Alternative formats of all policy will be made available upon request.</i></p>		



Accessibility Requirement	Status	Responsibility
General Requirements		
<p><i>Multi-Year Accessibility Plan</i></p> <ol style="list-style-type: none"> 1. Create and make public a multi-year accessibility plan. 2. Provide the plan in accessible formats upon request. 3. Review the plan every five (5) years. 	Completed/ Ongoing	Human Resources
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ol style="list-style-type: none"> 1. All applicable IASR requirements have been reviewed to develop a living Accessibility Plan. Roles of all internal stakeholders have been reviewed to determine how each will be affected by requirements. The Accessibility Plan has been created to include training, procedures, and policy development to ensure the identification and removal of barriers. The plan has been approved and is available to the public. 2. Requests for accessible formats of this document will be forwarded to the HR Manager who will work with the individual to determine the most suitable format. 3. This plan will be amended as required and will be reviewed fully by January 1, 2019 and every five (5) years thereafter. 		

Accessibility Requirement	Status	Responsibility
General Requirements		
<p><i>Training</i></p> <ul style="list-style-type: none"> • Train all employees, including contract and unpaid mentees/interns on applicable IASR requirements and the organization's responsibilities under the <i>Human Rights Code</i> (as it pertains to persons with disabilities). 	Completed/ Ongoing	Human Resources



Sarmazian Brothers Ltd.' Action Plan

1. Training* for new employees will be delivered via two (2) online training modules covering all applicable content as required under the IASR:
 - a) AODA Customer Service Standards Training; and
 - b) Understanding Human Rights Training (AODA edition).
 2. Certification/record of completed training will be retained via the company.
- * *Training will also be made available via alternate formats including in-person presentation, as requested.*

Accessibility Requirement	Status	Responsibility
Information and Communication Standard		
<p><i>Accessible Websites and Web Content</i></p> <ul style="list-style-type: none"> • Ensure website and web content published after January 1, 2012 conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, level A. 	Completed/ Ongoing	IT Department/IT Manager
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ol style="list-style-type: none"> 1. To date, Sarmazian Brothers Ltd.' public website and its content meet all requirements under the WCAG 2.0 level A. 2. Sarmazian Brothers Ltd.' IT department is fully aware of WCAG requirements and will ensure all new content and/or any substantial refreshes to the site conform to established guidelines. 		

Accessibility Requirement	Status	Responsibility
Information and Communication Standard		
<p><i>Feedback</i></p> <ul style="list-style-type: none"> • Upon request, be able to receive and respond to feedback from clients, individuals inquiring about Sarmazian Brothers Ltd., our employees and members of the public who have a disability. 	Completed	IT Department/IT Manager



Sarmazian Brothers Ltd.' Action Plan

1. A process for receiving and responding to accessible feedback requests has been developed and communicated to all relevant employees. Currently Sarmazian Brothers Ltd. can facilitate requests via the phone, email and mail (enlarged text available).
2. As feedback may be received by various departments and personnel at Sarmazian Brothers Ltd., including reception and customer service; training on how to receive and respond to accessible feedback requests has been developed and delivered based on the different positions within the company.
3. Receiving and responding to feedback will be included in all new hire orientations where the position frequently receives and responds to requests.
4. All other employees will be notified as to the internal party to whom they should direct any accessible feedback requests.

Accessibility Requirement	Status	Responsibility
Information and Communication Standard		
<p><i>Accessible Formats and Communication Supports</i></p> <ol style="list-style-type: none"> 1. Upon request, provide accessible formats and communication supports to individuals with disabilities. 2. Notify the public of the availability of accessible formats and communication supports. 3. Where a communication support or accessible format cannot be provided immediately, consult with the client to arrange for a suitable format as soon as possible. 	Ongoing	IT Department/IT Manager



Sarmazian Brothers Ltd.' Action Plan

1. Clients and the public may submit a complaint or inquiry through the company Feedback Form.
2. Have employees forwarded requests to management who will arrange for a suitable and alternative format/communication support.
3. Make public Sarmazian Brothers Ltd.'s ability to provide for or arrange for the provision of accessible formats and communication supports by posting a statement on the company website.

Accessibility Requirement	Status	Responsibility
Employment Standard		
<p><i>Workplace Emergency Response Information</i></p> <ol style="list-style-type: none"> 1. Create and implement individualized plans to assist employees with disabilities during an emergency. 2. Obtain consent from employees with individualized plans to disclose emergency response or evacuations plans to the person responsible for assisting the employee in situations where the plan requires the assistance of a colleague. 3. Create and provide emergency information formatted in such a way that the employee with the disability can understand its contents/direction as soon as practicable following the receipt of the request and/or becoming aware of the need for an individualized plan. 4. Review the individualized plan/information: <ol style="list-style-type: none"> a) When the employee moves to a different location in the office; b) When the employee's overall accommodation needs and plan are reviewed; and c) When the company reviews its general emergency response policies. 	Ongoing (based on employee needs)	IT Department/IT Manager



Sarmazian Brothers Ltd.' Action Plan

1. Recognizing that most disabilities are invisible or episodic and therefore not readily apparent, the workplace emergency information form allows employees to identify emergency planning requirements. Additionally, this is reiterated during onboarding, and again through online training.
2. The process for providing emergency information includes alternative formats and will be completed in a timely manner upon receipt of the request or becoming aware of the need for an individualized plan.
3. The process/policy used by the company to develop an individualized emergency response plan includes the requirement that consent is obtained from the requesting employee to disclose the contents of the plan to the individual required to provide assistance when responding to the emergency or evacuation. The process for obtaining consent also includes obtaining the acknowledgement of the employee designated to provide the assistance that the confidentiality of the individualized plan will be maintained, unless the health and safety of either party is potentially compromised.
4. Individualized emergency plans include the requirement that the plan be reviewed:
 - a) If the employee moves to another location within the office that would affect that person's ability to respond to the emergency or evacuation (the ability of the individual designated to provide assistance, where needed, will also be considered);
 - b) On a recurring timeline, to be established during the creation of the individualized emergency response plan. Factors that are taken into consideration when developing the recurring timeline (e.g., once every six (6) months, annually, etc.) include the nature and severity of the disability as well as its classification of permanent or temporary. A review of the plan will also be initiated if requested by the employee; and
 - c) When the company amends its emergency response and/or evacuation procedures.

Accessibility Requirement	Status	Responsibility
Employment Standard		
<i>Documented Individual Accommodation Plans</i> <ul style="list-style-type: none"> • Develop and implement a written process for the development of documented individual accommodation plans for employees with disabilities. 	Ongoing	IT Department/IT Manager

Sarmazian Brothers Ltd.' Action Plan

1. Sarmazian Brothers Ltd. has developed and implemented a written process for the development of documented individual accommodation plans for employees with disabilities. As per IASR requirements, the plan includes the following elements:
 - a) The manner in which an employee requesting accommodation can participate in the development of the accommodation plan;
 - Sarmazian Brothers Ltd. will endeavour to ensure the employee is able to actively participate in the development of the accommodation plan. Limitations will be identified and clearly communicated to the employee prior to the development of the plan.
 - b) The means by which the employee is assessed on an individual basis.
 - c) The manner in which Sarmazian Brothers Ltd. can request the participation of a representative from the company in the development of the accommodation plan.
 - d) The steps that will be taken to protect the privacy of the employee's personal information;
 - The content of the accommodation plan will be restricted to only those required to facilitate the plan or supervise the employee. The accommodation plan template will include a section identifying the individuals that will have knowledge of the plan and will require each person to sign an acknowledgement of the confidentiality of its contents.
 - e) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
 - f) An outline of how the reasons for a denial of an accommodation will be communicated to the requesting employee;
 - Employees will be informed of the factors that will be taken into consideration by the company when a request for accommodation is received as well as employer and employee expectations and responsibilities.
 - g) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to a disability;
 - Accommodation plan documents will be made available in accessible formats.
 - h) The accommodation plan template will include a section regarding the provision of accessible formats and communication supports to be completed in the event that such supports are required by the employee.
 - i) The accommodation plan will also include an emergency response/evacuation plan if required by the employee.
 - j) The accommodation plan will be created to include a section outlining additional accommodations that are required.



Accessibility Requirement	Status	Responsibility
Employment Standard		
<p><i>Recruitment, Assessment, and Selection</i></p> <ol style="list-style-type: none"> 1. Notify employees and the public about the availability of accommodation for applicants with disabilities in the company's recruitment processes. 2. During the recruitment process, notify applicants selected to participate in our selection and assessment processes that accommodations are available upon request and in relation to the materials and/or processes used by Sarmazian Brothers Ltd.. 3. Should a job applicant request accommodation, consult with the individual and make adjustments to best suit his/her needs. 4. Notify successful applicants of the company's policies for accommodating employees with disabilities. 	Ongoing	IT Department/IT Manager
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ol style="list-style-type: none"> 1. Successful applicants will be informed of the availability of accommodations relating to Sarmazian Brothers Ltd.' selection/assessment processes upon initial contact from the hiring manager or Recruiter; <ol style="list-style-type: none"> a) All assessment methods used by the company will be reviewed and alternates developed to facilitate accessibility requests; b) When updating or amending assessment/selection methods, an assessment will be conducted to identify potential barriers and alternative/accessible formats will be developed; and c) Any accommodation request pertaining to the company's selection/assessment methods that cannot be met with current alternate formats will be forwarded to management who will work with the individual to develop an acceptable alternative. 2. When scheduling interviews, Sarmazian Brothers Ltd. will include a statement in all email confirmations indicating to the applicant that accommodations are available and inviting the applicant to inform the hiring manager/Recruiter of any necessary accommodations. 3. Internal accessibility policies will be provided to all new hires as part of their orientation package. Alternative formats of the policy will be made available upon request. 		



Accessibility Requirement	Status	Responsibility
Employment Standard		
<p><i>Accessible Formats and Communication Supports for Employees</i></p> <ol style="list-style-type: none"> 1. Where an employee with a disability requests it, work with that individual to provide or arrange for the provision of accessible formats and communication supports for: <ol style="list-style-type: none"> 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. 2. Where a request is made, work with the requesting employee to determine the suitability of the proposed accessible format/communication support. 	Ongoing	IT Department/IT Manager
<p><i>Sarmazian Brothers Ltd.’ Action Plan</i></p> <ol style="list-style-type: none"> 1. The availability of accessible formats and communication supports has been communicated to all employees upon hire. Sarmazian Brothers Ltd. has completed a review of information that is provided to employees and the manner in which it is provided. Information that is needed to perform an employee’s job is generally provided via one-on-one or group training sessions whereas information that is generally available in the workplace is typically provided in written policy format available in hardcopy or electronically. Prior to providing the information needed to perform one’s job or information generally available in the workplace, employees requiring accessible formats or communication supports will be requested to notify management so that alternate arrangements may be made. 2. Upon receiving a request, the company will work with the employee and any individuals responsible for providing the information (for example the employee’s manager, supervisor or team lead) to deliver a suitable accessible format or communication support. Prior to involving the employee’s supervisor, manager, or team lead, consent will be obtained from the employee. 		
Accessibility Requirement	Status	Responsibility
Employment Standard		



<p><i>Information for Employees</i></p> <ol style="list-style-type: none"> 1. Communicate the company's policy on accommodating employees with disabilities to all staff members. 2. Ensure that all new hires are informed of the company's policy on accommodating employees with disabilities. 	Ongoing	HR
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<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ol style="list-style-type: none"> 1. Sarmazian Brothers Ltd.' Accommodation Policy was developed and has been made available to employees. 2. All new hires are provided with the relevant company policies in their new hire package. Policies address how Sarmazian Brothers Ltd. will support employees with disabilities, including emergency planning/responses, accessible formats and communication supports as well as accessible performance management, career development and job change processes. 3. Ensure that all employees are informed of changes to the relevant policies as they occur. Changes will be communicated via our online platform. 		
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Accessibility Requirement	Status	Responsibility
Employment Standard		
<p><i>Processes to Accommodate Employees/Return to Work Process</i></p> <ul style="list-style-type: none"> • Create a process to develop accommodation plans and return to work plans for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. 	Ongoing	HR
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ul style="list-style-type: none"> • Use updated forms to ensure that all accommodation and RTW plans are properly recorded and retained on file. • For consistency, the accommodation plan template will be used in conjunction with RTW processes. • Forms and associated process documentation will be reviewed and updated as required. 		

Accessibility Requirement	Status	Responsibility
Employment Standard		



<p><i>Accessible Performance Management, Career Development and Job Changes</i></p> <ul style="list-style-type: none"> Ensure the organization's performance management and career development opportunities account for the accessibility needs and plans of employees and that these processes are inclusive and barrier-free. 	Ongoing	HR
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ul style="list-style-type: none"> Continuously evaluate Sarmazian Brothers Ltd.' performance management and career development processes to identify barriers. Develop processes to ensure that such functions are completely accessible. 		

Accessibility Requirement	Status	Responsibility
Employment Standard		
<p><i>Redeployment</i></p> <ul style="list-style-type: none"> Take into account the accessibility needs and accommodation plans of employees who are reassigned to an alternate department or position with the company as an alternative to a layoff. 	Ongoing	HR
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ul style="list-style-type: none"> As part of the redeployment process, Sarmazian Brothers Ltd. will incorporate the accessibility needs and accommodation plans of any employee that is being redeployed to an alternate position and/or department. The company will oversee the redeployment process; however, new and/or amended reporting hierarchies will be reviewed to determine who is to be involved with and informed of any accessibility plans and requirements. 		

Accessibility Requirement	Status	Responsibility
Design of Public Spaces		

<p><i>Make parking accessible</i></p> <ul style="list-style-type: none"> Ensure that when constructing new or redeveloping off-street parking facilities that the company intends to maintain, the off-street parking facilities meet the requirements 	Ongoing	
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ol style="list-style-type: none"> Sarmazian Brothers Ltd. will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities: <ol style="list-style-type: none"> Type A – Parking space with a minimum width of 3.4 m; and Type B – Standard parking space with a minimum width of 2.4 mm. Access aisles will be provided for all accessible parking spaces and will meet the requirements of the <i>Integrated Accessibility Standards</i>, section 80.35. Sarmazian Brothers Ltd. will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the <i>Integrated Accessibility Standards</i>, section 80.36. Sarmazian Brothers Ltd. will ensure that the proper signage is provided for each accessible parking space. Type A parking spaces will have signage indicating van accessibility. 		

Accessibility Requirement	Status	Responsibility
Design of Public Spaces		
<p><i>Make service counters, queuing guides and waiting areas accessible</i></p> <ul style="list-style-type: none"> The company must consider the accessibility needs for persons with disabilities when designing, procuring or acquiring self-service kiosks (an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products.) 	Ongoing	
<p><i>Sarmazian Brothers Ltd.' Action Plan</i></p> <ul style="list-style-type: none"> Sarmazian Brothers Ltd. will incorporate accessibility features when designing, procuring or acquiring self-service kiosks. Sarmazian Brothers Ltd. will always be aware of the accessibility features of self-service kiosks for persons with disabilities. 		

