



## ACCESSIBILITY POLICY

(for Ontarians with Disabilities Act (AODA)  
and Accessible British Columbia Act (ABCA),  
Quebec Charter)

April 2026

Activo Inc.

90 Gough Road, Unit # 1, Markham, ON L3R 5V5

Telephone: 905-752-1900 Fax: 905-752-1910

# Activo

## Policy

Activo Inc. (“Activo”) is committed to providing excellent service to all clients, employees, applicants, visitors, and other stakeholders including persons with disabilities. Activo’s goal is to identify, remove, and prevent barriers for persons with disabilities. This Policy complies with the legal requirements of *the Integrated Accessibility Standards Act (IASR)*, *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, *Quebec’s Charter of Human Rights and Freedoms*, and will voluntarily align with the *Accessible British Columbia Act (ABCA)* for best practices. Where provincial or territorial legislation provides greater protection or imposes additional obligations, those requirements shall apply.

## Scope

This policy applies to all Activo employees (full-time, part-time, contract), volunteers, interns, contractors, and third-party service providers acting on behalf of Activo.

## Definitions

“Disability” means,

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, congenital disability or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder,
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act 1997*.

## Four Guiding Principles

Activo will strive to ensure its policies, practices, and procedures are consistent with the following core principles:

- **Dignity:** Ensure persons with disabilities are provided with services that will allow them to maintain self-respect and the respect of others.
- **Independence:** Ensure persons with disabilities have the right to do things for themselves and in their own way.
- **Integration:** Ensure persons with disabilities fully benefit from the same goods and services in the same place and the same or similar manner as others. This may require alternative formats and flexible approaches. It means complete and full participation.

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- Equal Opportunity: Ensure persons with disabilities have the same chances, options, benefits and results as others.

## Multi-Year Accessibility Plan

Where required by legislation, Activo will:

- Develop, maintain and make publicly available a multi-year accessibility plan
- Provide the plan in an accessible format upon request
- Review and update the plan at least **once every five years**

## Procedures and Responsibilities

### Senior Management:

- Provide oversight and ensure Activo's commitment to accessibility plan is upheld

### Human Resources:

- Maintain this policy and ensure ongoing compliance
- Coordinate and document accessibility training
- Oversee accommodation processes

### Managers and Supervisors:

- Support staff in meeting accessibility requirements
- Ensure accessibility practices are applied consistently

### Employees:

- Follow accessibility standards and training
- Treat persons with disabilities respectfully and according to this policy

Activo is committed to using reasonable efforts in providing goods and services to all customers, including persons with disabilities and will carry out our functions and responsibilities in the following areas:

### Accommodation

Activo will accommodate persons with disabilities to the point of undue hardship, in accordance with applicable human rights legislation. Accommodation requests will be handled in a timely and confidential manner and documented where required.

### Communication

Activo is committed to ensuring that all employees are fully aware of how to interact and communicate with persons with disabilities. We will train our employees who communicate with customers to interact and communicate with people with various types of disabilities. Activo will communicate with persons with disabilities in a manner that considers their disability. This includes using plain language, offering alternative communication methods, and ensuring staff are trained to interact respectfully and effectively.

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## **Accessible Formats and Communication Supports**

Upon request, Activo will provide or arrange for accessible formats and communication supports in a timely manner, at no additional cost, in consultation with the person with disability to determine the most appropriate format. Examples include: large print, electronic text, braille (via external provider), captioning or transcripts.

## **Assistive Devices**

Activo is committed to serving persons with disabilities who may use assistive devices to obtain, use, or benefit from goods and/or services. We will ensure that all employees are aware of and familiar with various assistive devices that may be used while accessing our goods and/or services.

## **Use of Service Animals and Support Persons**

Activo is committed to welcoming persons with disabilities and their guide dogs or service animals in the areas of our premises that are open to the public. Please note that a “*guide dog*” is a dog trained by the regulations under the Blind Persons’ Rights Act. Also, a “*service animal*” is an animal for persons with disabilities. If it is readily apparent that the person uses the animal for reasons relating to their disability or if the person provides a letter from a physician or a nurse confirming that the person requires the animal for reasons relating to the disability.

Activo will also ensure that our employees are trained to interact with customers with disabilities whom a guide dog or service animal accompanies.

Any person with disabilities accompanied by a support person will be allowed to enter Activo premises open to the public or other third parties with that person. At no time will persons with disabilities whom a support person accompanies be prevented from having access to that person while on our premises.

## **Barrier-Free Workplace & Built Environment**

Activo is committed to providing a workplace environment free of physical barriers. Where feasible, this includes:

- Accessible entrances and pathways
- Accessible washrooms
- Ergonomic workstations
- Emergency evacuation procedures tailored for employees requiring assistance
- Proactive identification of physical barriers during facility updates

## **Notice of Temporary Disruption**

We will notify visitors in the event of a planned or unexpected temporary disruption in the Activo offices or services usually used by persons with disabilities. Notices will be provided in accessible formats where possible and will include the reason for the disruption, its expected duration, and alternative arrangements if available.

## **Training for Employees**

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Activo will train all employees, partners, volunteers, and others who deal with the public or third parties on behalf of Activo. Activo will also provide training for those involved in developing and approving policies, practices, and procedures.

Training will consist of the following:

- Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), the Accessible British Columbia Act and applicable accessibility legislation and the requirements of the Accessibility Standards for Customer Service
- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog service animal or a support person
- What to do if persons with disabilities are having difficulty accessing Activo's goods and services

Training will be provided to all current employees upon this policy taking effect and upon amendments to the policy. New employees will be provided with such training as part of their orientation. Documentation of training of employees shall be maintained by Human Resources and/or Management.

## **Feedback Process**

Comments and feedback about the delivery of services to persons with disabilities are welcome, as they may help identify areas that require change and assist in continuous improvement. Feedback can be provided via email: [HR@activo.ca](mailto:HR@activo.ca), Telephone: (905) 752-1900, mail or in-person at 90 Gough Road Unit 1 Markham, ON L3R 5V5. Feedback will be addressed immediately. Some feedback may require more effort to address and needs to be reviewed in detail. Accessible formats will be provided upon request.

## **Availability of Policy**

Per Provincial Legislation, this policy will be available to anyone upon request and provided in an accessible format where required.

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