



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

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## Intent

This 2024 to 2029 accessibility plan outlines the policies and actions that Losani Homes Ltd. and any subsidiaries 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

Losani Homes 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.

Losani Homes is committed to always respecting the dignity and independence of people. We believe in integration and opportunity and are committed to meeting the needs of people with disabilities by removing barriers to accessibility through the timely review and development of policies that meet or exceed the Accessibility for Ontarians with Disabilities Act. The purpose of this Policy is to ensure the Losani Homes is compliant with the requirements of the Accessibility for Ontarians with Disabilities Act (AODA) and that we address accessibility policies and standards required by the Integrated Accessibility Standards Regulations (IASR).

## Application

This Policy compliments Losani Homes' Accessibility Standards for Customer Service Policies and Procedures. This Policy applies to all Losani Homes staff, contractors, students on placement and third parties in the provision of goods, services or facilities to the public or employees. All services provided by Losani Homes and all interactions with our staff and the community follow the ideals of dignity, independence, integration and equal opportunity. We will meet or exceed all applicable legislation regarding accessibility.

## Purpose

Losani Homes has established a multi-year accessibility plan documenting the steps to be undertaken to meet the requirements of the IASR and will ensure ongoing policy development to prevent and remove barriers to accessibility. The multi-year accessibility plan is posted on our website and will be made available in accessible formats upon request. The plan will be reviewed at least every five years.

The Human Resources Manager is responsible for leading the implementation of the initiatives contained in the multi-year accessibility plan and ensuring Losani Homes meets its target completion dates. The Human Resources Manager will consult with individuals or groups with disabilities during the implementation of the plan. The Human Resources Manager will review and update the status on the progress of the plan annually and post the updates externally on the Company Website, and internally on the Health & Safety Boards and on the company intranet.

## Definitions

- **Accessible Formats:** may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.



- **Alternative Format:** any other ways of publishing information beyond traditional printing, e.g., large print, audio format, etc.
- **Assistive Device:** auxiliary aid such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs, hearing aids, etc).
- **Barrier:** anything that prevents a person with a disability from fully participating in all aspects of society because of their disability including a physical barrier, architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.
- **Communications:** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- **Communication Supports:** may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- **Conversion Ready:** means an electronic or digital format that facilitates conversion into an accessible format.
- **Disability:** shall mean the same as the definition of disability found in the Ontario Human Rights Code:
  - any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect 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 co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
  - a condition of mental impairment or a developmental disability,
  - a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
  - a mental disorder, or
  - an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

## Summary of Actions as of June 1<sup>st</sup>, 2025

General and Training Requirements, Information, Communication and Customer Service Standards, and Accessible Websites

Target Standard	Actions	Status/Review Date
<b>Accessibility Standard for Customer Service</b>		
<p>Policy and Procedures were developed that comply with the Accessibility Standard for Customer Service including:</p> <ul style="list-style-type: none"> <li>• provision of goods and services to persons with disabilities;</li> <li>• the use of assistive devices;</li> <li>• the use of guide dogs, service animals and service dogs;</li> <li>• the use of support persons;</li> <li>• notice of service disruptions;</li> <li>• customer feedback;</li> <li>• training; and</li> <li>• notice of availability and format of documents.</li> </ul> <p>Policies and Procedures are consistent with the core principles of independence, dignity, integration and equal opportunity.</p>	<ul style="list-style-type: none"> <li>• Developed Integrated Accessibility Standards Regulation (IASR) Customer Service policy on November 8, 2019.</li> <li>• The policy is shared with staff on the internal network and posted on the Health &amp; Safety Board.</li> <li>• All staff were trained on the Customer Service Policy in 2019 and annual review thereafter.</li> <li>• Annual training to take place in Q3 2025.</li> </ul>	<p><b>Completed Date:</b> Ongoing</p> <p><b>Reviewed:</b> June 1, 2025</p>
<b>Target Standard</b>		
<b>Integrated Accessibility Standards Regulation (IASR) O. Reg 191/11</b>	<b>Actions</b>	<b>Status/Review Date</b>



Losani Homes shall provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and Human Resources is aware of the need for accommodation due to the employee's disability.	<ul style="list-style-type: none"> <li>Incorporated into Human Resources Policies and Procedures.</li> </ul>	<b>Completed Date:</b> November 8, 2019  <b>Reviewed:</b> June 1, 2025
<b>Section I – General</b>	<ul style="list-style-type: none"> <li>Developed Accessibility Policy incorporating statement of commitment and plan to achieve compliance with IASR through ongoing policy review.</li> </ul>	<b>Completed Date:</b> November 8, 2019  <b>Reviewed:</b> June 1, 2025
<b>3.0 Establish Accessibility Policies</b>		
3.1 Losani Homes shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation.		
3.2 Include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in Losani Homes' policies.	<ul style="list-style-type: none"> <li>Losani Homes has developed an organizational statement of commitment, which is incorporated into an Accessibility Policy and included in the Accessibility Plan.</li> </ul>	<b>Completed Date:</b> November 8, 2019  <b>Reviewed:</b> June 1, 2025
<b>4.0 Accessibility Plans</b>	<ul style="list-style-type: none"> <li>Accessibility Plan developed and approved by Human Resources on November 8, 2019.</li> <li>Accessibility Plan posted on website and provided in an accessible format, if requested.</li> <li>Accessibility Plan will be reviewed at least once every five years.</li> </ul>	<b>Completed Date:</b> November 8, 2019  <b>Reviewed:</b> June 1, 2025
4.1 Losani Homes shall: <ul style="list-style-type: none"> <li>establish, implement, maintain and document a multi-year accessibility plan outlining the organization's strategy to prevent and remove barriers and meet its requirements under IASR;</li> <li>post the plan on our website, provide the plan in an accessible format upon request, and;</li> <li>review and update the plan at least once every five years</li> </ul>		
<b>7.0 Training</b>	<ul style="list-style-type: none"> <li>Provided organization-wide training on AODA Customer Service Standards in 2019 and also requires annual refresher training.</li> <li>Staff are trained upon hire and required to complete refresher training annually. Human Resources will arrange training.</li> <li>Training on the Ontario Human Rights Code and IASR accessibility standards will be provided to all employees, volunteers and persons who provide services on behalf of Losani Homes.</li> </ul>	<b>Completed Date:</b> Ongoing  <b>Reviewed:</b> June 1, 2025
7.1 Losani Homes shall ensure training is provided on the requirements of accessibility standards referred to in IASR and on the Human Rights Code as it pertains to persons with disabilities to all employees, volunteers, persons who participate in developing Losani Homes' policies and all other persons who provide goods, services or facilities on behalf of Losani Homes.		
7.2 The training requirements referred to in subsection 7.1 shall be appropriate to the duties of the employees, volunteers and other persons.	<ul style="list-style-type: none"> <li>Training materials will be assessed by Human Resources and tailored to the target audience.</li> </ul>	<b>Completed Date:</b> Ongoing  <b>Reviewed:</b> June 1, 2025
7.3 Every person referred to in subsection 7.1 shall be trained as soon as practicable.	<ul style="list-style-type: none"> <li>All employees are trained as of November 8, 2019 – annual refresher training will be organized by Human Resources to ensure all employees, volunteers and persons who provide services on behalf of Losani Homes are trained or have completed refresher training by October 1<sup>st</sup>, 2025.</li> </ul>	<b>Completed Date:</b> Ongoing  <b>Reviewed:</b> June 1, 2025
7.4 Losani Homes shall provide training in respect of any changes to the Accessibility Policies in section 3.0 on an ongoing basis.	<ul style="list-style-type: none"> <li>Annual AODA training refresher is provided to employees. New and/or changed policies are provided to employees and posted on the intranet. This will be expanded to include contractors and other stakeholders.</li> </ul>	<b>Completed Date:</b> Ongoing  <b>Reviewed:</b> June 1, 2025
7.5 Losani Homes shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.	<ul style="list-style-type: none"> <li>The Human Resources Department maintains employee training records. This will be expanded to include contractors and other stakeholders.</li> </ul>	<b>Completed Date:</b> Ongoing  <b>Reviewed:</b> June 1, 2025
<b>Section II – Information and Communication Standards</b>	<ul style="list-style-type: none"> <li>Current communication processes for persons with disabilities are made available and organizational</li> </ul>	<b>Completed Date:</b> November 8, 2019
<b>11.0 Feedback</b>		



11.1 Losani Homes shall ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.	<ul style="list-style-type: none"> <li>commitment is documented in the AODA Customer Service Standards Policies.</li> <li>Losani Homes will review feedback processes on an annual basis to ensure they note that accessible formats and communications supports are available upon request.</li> </ul>	<b>Reviewed:</b> June 1, 2025
11.3 Losani Homes shall notify the public about the availability of accessible formats and communications supports.	<ul style="list-style-type: none"> <li>Losani Homes has posted on their website to notify the public about the availability of accessible formats and communications supports.</li> </ul>	<b>Completed Date:</b> November 8, 2019 <b>Reviewed:</b> June 1, 2025
<b>12.0 Accessible Formats and Communication Supports</b>	<ul style="list-style-type: none"> <li>Provided organization-wide training on AODA</li> <li>The Losani Homes Integrated Accessibility Standards Regulation (IASR) Customer Service policy contains our commitment to provide accessible formats and communications supports.</li> <li>This commitment is also indicated on the company website to notify the public.</li> <li>Losani Homes will also consult with the person making the request to determine the suitability of an accessible format or communications support.</li> </ul>	<b>Completed Date:</b> November 8, 2019 <b>Reviewed:</b> June 1, 2025
12.1 Losani Homes shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs.		
<b>14.0 Accessible Websites and Web Content</b>	<ul style="list-style-type: none"> <li>Losani Homes website has been audited by Human Resources to ensure compliance with WCAG 2.0 Level AA.</li> <li>Website audits shall be performed annually.</li> </ul>	<b>Completed Date:</b> Ongoing <b>Reviewed:</b> June 1, 2025
14.2 Losani Homes shall make internet website and web content conform to WCAG 2.0 Level AA.		
<b>Other Recommendations</b>	<b>Actions</b>	<b>Status/Review Date</b>
The Losani Homes website be updated to include an updated statement of commitment and updated Multi-Year Accessibility Plan.	<ul style="list-style-type: none"> <li>Human Resources to coordinate with sales and marketing team to update the Losani Homes website by July 1<sup>st</sup>, 2025.</li> </ul>	<b>Completed Date:</b> Pending Completion <b>Reviewed:</b> June 1, 2025

## Employment Standards

Target Standard	Actions	Status/Review Date
<b>Integrated Accessibility Standards Regulation (IASR) O. Reg 191/11</b>		
<b>Section III – Employment Standards</b>		
22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<ul style="list-style-type: none"> <li>Human Resources modified all employment postings to add an <i>Equal Opportunity</i> Statement, which indicates to all applicants that Losani Homes will provide accommodation if requested at any stage of the recruitment process.</li> </ul>	<b>Completed Date:</b> February 28 <sup>th</sup> , 2025 <b>Reviewed:</b> June 1, 2025
23. (1) During a recruitment process, Losani Homes shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability. 24. Losani Homes shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<ul style="list-style-type: none"> <li>Human Resources will review and amend Recruitment Policies and processes by July 1<sup>st</sup>, 2025, to add a requirement to let selected candidates know of the availability of accommodation, upon request, for recruitment materials or processes.</li> </ul>	<b>Completed Date:</b> Ongoing <b>Reviewed:</b> June 1, 2025
25. Losani Homes shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into	<ul style="list-style-type: none"> <li>The Human Resources Manager to review and update the Losani Homes Accommodation Policy and provide the updated policy and annual training to all staff and new hires by December 31<sup>st</sup>, 2025. The Accommodation policy to include the process for the</li> </ul>	<b>Completed Date:</b> Ongoing <b>Reviewed:</b> June 1, 2025



<p>account an employee's accessibility needs due to disability.</p> <p>28. Losani Homes shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>29. Losani Homes shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.</p>	<p>development of documented individual accommodation plans for employees with disabilities.</p> <ul style="list-style-type: none"> <li>The Human Resources manager will review and update the Return to Work policy to ensure the process is followed for employees who are returning to work that have been absent from work to a disability.</li> </ul>	
<p>27. Losani Homes shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p> <ul style="list-style-type: none"> <li>If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</li> </ul>	<ul style="list-style-type: none"> <li>With the employee's consent, the Human Resources Manager will coordinate with the Joint Health and Safety Committee to develop an individualized emergency response plan for employees who have a disability, if known, and with the employee's consent, the plan will be shared with those who are required to provide assistance.</li> </ul>	<p><b>Completed Date:</b> June 30<sup>th</sup>, 2024</p> <p><b>Reviewed:</b> June 1, 2025</p>
<p>30. Losani Homes shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<ul style="list-style-type: none"> <li>The Human Resources Manager will create accessible formats for the performance management process, upon request.</li> </ul>	<p><b>Completed Date:</b> June 1<sup>st</sup>, 2025</p> <p><b>Reviewed:</b> June 1, 2025</p>

## Design of Public and Employee Spaces

Target Standard	Actions	Status/Review Date
<p><b>Section IV – Design of Public Spaces Standards</b></p> <p>80.17 Losani Homes shall ensure that where they construct or redevelop outdoor public use eating areas that they intend to maintain, the outdoor public-use eating areas meet the following requirements:</p> <ul style="list-style-type: none"> <li>A minimum of 20 per cent of the tables that are provided must be accessible to persons using mobility aids by having knee and toe clearance underneath the table and in no case shall there be fewer than one table in an outdoor public use eating area that meets this requirement.</li> <li>The ground surface leading to and under tables that are accessible to persons using mobility aids must be level, firm and stable.</li> <li>Tables that are accessible to persons using mobility aids must have clear ground space around them that allows for a forward approach to the tables.</li> </ul>	<ul style="list-style-type: none"> <li>The Human Resources Manager will coordinate with the Property Management team to ensure newly constructed outdoor public use common areas comply with the regulation.</li> </ul>	<p><b>Completed Date:</b> November 8, 2019</p> <p><b>Reviewed:</b> June 1, 2025</p>
<p><b>Other Recommendations</b></p> <p>Losani Homes to ensure the second floor is accessible by elevator.</p>	<ul style="list-style-type: none"> <li>The Human Resources Manager will coordinate with the Property Management team to ensure the elevator is working.</li> </ul>	<p><b>Completed Date:</b> November 8, 2019</p> <p><b>Reviewed:</b> June 1, 2025</p>



Losani Homes will ensure washrooms are barrier free for staff.	<ul style="list-style-type: none"><li>The Human Resources Manager will coordinate with the Property Management and Construction teams to install a power door opener for the Production area washroom doors.</li></ul>	<b>Completed Date:</b> Ongoing  <b>Reviewed:</b> June 1, 2025
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## Review and Update

This document was reviewed on June 1<sup>st</sup>, 2025, and must be reviewed and updated by January 1<sup>st</sup>, 2029.