



McDougall Energy Inc.

Multi-Year Accessibility Plan 2025-2029

Accessibility for Ontarians with Disabilities Act, 2005,
Ontario Regulation 191/11 Integrated Accessibility Standards

The Accessibility Plan is available on the McDougall Energy website.

Alternative formats are available upon request.

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Introduction and statement of commitment

The **Integrated Accessibility Standards Regulation (IASR)** under the **Accessibility for Ontarians with Disabilities Act (AODA)** requires organizations to establish, maintain, and document a multi-year accessibility plan that outlines measures to identify, remove, and prevent barriers for persons with disabilities.

McDougall Energy Inc. is committed to fostering an inclusive environment by integrating accessibility considerations into its policies, practices, and procedures. Through its multi-year accessibility planning, McDougall Energy seeks to support accessible service delivery, communications, employment practices, and the design of public spaces, in accordance with applicable accessibility standards.

This 2025-2029 Multi-Year Accessibility Plan builds on the foundational work of previous plans and outlines measures that have been implemented, as well as ongoing and planned actions, to support continued compliance with the AODA and the IASR in the following areas:

- Customer Service
- Information and Communications
- Employment
- Training
- Design of Public Spaces
- Transportation (where applicable)

McDougall Energy recognizes that accessibility is an ongoing commitment and that accessibility needs may evolve as business operations, systems, and regulatory expectations change. Accordingly, McDougall Energy remains committed to reviewing and improving its accessibility practices in consultation with employees, customers, and other stakeholders, as appropriate.

In accordance with the requirements of the AODA, McDougall Energy will:

- Make this Multi-Year Accessibility Plan publicly available and provide it in accessible formats upon request; and
- Review and update the plan at least once every five (5) years.

Section One: Past Achievements to Remove and Prevent Barriers

McDougall Energy's previous Multi-Year Accessibility Plan covered the period from 2019 to 2024. During that period, McDougall Energy implemented a number of measures to identify, remove, and prevent barriers for persons with disabilities in accordance with the AODA and Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation (“IASR”)

Measures implemented under this plan include:

1. Customer Service

McDougall Energy is committed to ensuring that people with disabilities receive accessible goods and services.

To meet the requirements of the Accessibility Standards for Customer Service Regulation, McDougall Energy has:

- Implemented procedures that provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities.
- Ensured that such notices include information regarding the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, where available.
- Updated visitor-related policies and protocols to address emergency response requirements, including procedures to determine individualized emergency response and evacuation plans for visitors with disabilities, where required.
- Continued to provide accessible formats and communication supports upon request in a timely manner and at no additional cost.

2. Information and Communications

McDougall Energy is committed to meeting the communication needs of persons with disabilities and ensuring that its information and communication systems are accessible.

To meet the requirements of the Information and Communications Standard under the IASR, McDougall Energy has:

- Implemented processes to provide information and communications in accessible formats and with appropriate communication supports upon request.
- Taken steps to ensure that McDougall Energy's website and web-based content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, subject to permitted exceptions under the IASR.

- Established internal practices to consider accessibility requirements when updating or implementing new web-based content or communication platforms.

3. Employment

McDougall Energy is committed to fair and accessible employment practices that attract and retain talented employees.

To meet the requirements of the Employment Standard under the IASR and support accessible employment practices, McDougall Energy has:

- Implemented processes to notify job applicants that accommodations are available during recruitment and selection.
- Consulted with applicants and employees who request accommodation to determine appropriate and individualized accommodation measures.
- Developed and implemented individualized accommodation plans for employees with disabilities, where required.
- Updated site-specific Emergency Response Plans to incorporate individualized emergency response and evacuation information for employees with disabilities, where necessary.
- Ensured that return-to-work processes, performance management, career development, and advancement practices take into account the accessibility needs of employees with disabilities.

4. Design of Public Spaces

McDougall Energy complies with accessibility requirements when constructing or redeveloping public spaces that it owns or controls, in accordance with the Design of Public Spaces Standard under IASR. These requirements apply only where McDougall Energy constructs or redevelops public spaces that it owns or controls.

McDougall Energy has ensured that, where applicable:

Exterior Paths of Travel

- Newly constructed or redeveloped exterior paths of travel meet the requirements set out under the IASR.
- Ramps, stairs, curb ramps, and depressed curbs forming part of exterior paths of travel comply with the applicable IASR requirements.

Accessible Parking

- Newly constructed or redeveloped off-street parking facilities meet the applicable accessibility requirements under the IASR.
- Accessible parking spaces include required access aisles.
- The minimum number of accessible parking spaces is provided in accordance with the IASR.
- Accessible parking spaces are clearly identified with appropriate signage in accordance with applicable regulations.

Service Counters and Waiting Areas

- New or replaced service counters meet the accessibility requirements under section 80.41 of the IASR.
- Where new or redeveloped waiting areas include fixed seating, the required number of accessible seating is provided.

5. Transportation

The Transportation Standard under the IASR does not apply to McDougall Energy.

Section Two: Report on planned measures to identify, remove and prevent barriers in 2025-2029

In addition to maintaining compliance with the standards and requirements outlined in Section One, McDougall Energy Inc.'s 2025–2029 Multi-Year Accessibility Plan builds on the foundational work of previous plans and outlines ongoing measures to identify, remove, and prevent barriers for persons with disabilities.

McDougall Energy remains committed to meeting its obligations under the AODA and IASR and to reviewing and improving accessibility practices as business operations, systems, and regulatory expectations evolve.

1. Customer Service

McDougall Energy will integrate and maintain accessibility considerations into its customer service practices to ensure that persons with disabilities are able to access goods and services in a manner that respects dignity, independence, integration, and equal opportunity.

- Maintain mechanisms for receiving, responding to, and addressing accessibility-related feedback from customers and members of the public.
- Periodically review customer service policies and procedures to ensure they continue to reflect accessibility requirements and operational practices.
- Review customer-facing communications and service interactions to identify and mitigate potential accessibility barriers.
- Ensure that processes for providing notice of planned or unexpected disruptions to facilities or services remain clear, effective, and accessible.
- Assess and respond to requests for accessible formats or communication supports in a timely and reasonable manner.

2. Information and Communications

McDougall Energy recognizes that information and communication systems continue to evolve and that accessibility considerations must be integrated into ongoing system management and decision-making.

To support continued compliance with the Information and Communications Standard under the IASR, McDougall Energy will:

- Consider accessibility requirements when implementing, upgrading, or replacing websites, digital content, or communication platforms.
- Periodically review website content and digital communications to assess accessibility as updates or changes are made.

- Maintain processes for responding to requests for accessible formats and communication supports for both internal and external communications.
- Where reasonably practicable, consider accessibility in the selection and use of third-party platforms used for communications, recruitment, or customer interaction.
- Ensure that accessibility-related inquiries or requests are directed to appropriate personnel and addressed in a timely manner.

3. Employment

McDougall Energy will continue to support accessible employment practices by integrating accessibility considerations throughout the employee lifecycle.

During the 2025–2029 period, McDougall Energy will:

- Maintain recruitment and hiring practices that incorporate accessibility considerations, including accommodation availability and consultation where required.
- Periodically review accommodation processes to ensure they remain responsive to employee needs and aligned with organizational practices.
- Maintain individualized accommodation plans and workplace emergency response information for employees with disabilities, where required, and review such information when employee roles, work locations, or needs change.
- Continue to apply return-to-work processes that support employees requiring accommodation following disability-related absences.
- Ensure that performance management, career development, advancement, and redeployment practices continue to take accessibility needs into account.
- Maintain processes for providing accessible formats and communication supports to employees upon request.

4. Training

McDougall Energy will continue to promote accessibility awareness by ensuring that employees receive appropriate training relevant to their roles.

To support ongoing compliance during the 2025–2029 period, McDougall Energy will:

- Maintain accessibility training programs addressing the requirements of the AODA, the IASR, and the Ontario Human Rights Code as they relate to persons with disabilities.

- Ensure that accessibility training is provided to new employees within a reasonable period following hire.
- Review training content periodically and provide refresher training where accessibility-related policies or practices are updated.
- Maintain records of accessibility training provided to employees.

5. Design of Public Spaces

McDougall Energy will continue to meet accessibility requirements when constructing or redeveloping public spaces that it owns or controls, in accordance with the Design of Public Spaces Standard under the IASR.

Where applicable, McDougall Energy will:

- Incorporate accessibility requirements into planning and decision-making for the construction or redevelopment of exterior paths of travel, parking facilities, service counters, and waiting areas.
- Ensure that accessibility requirements are considered when evaluating proposed construction or redevelopment projects.
- Apply the applicable IASR requirements to new or redeveloped public spaces where McDougall Energy has ownership or control.

6. Transportation

This standard does not apply to McDougall Energy.

7. Review and Ongoing Oversight

McDougall Energy will periodically review its accessibility practices during the 2025–2029 period to ensure that accessibility considerations remain integrated into its operations, policies, and procedures.

As part of this ongoing oversight, McDougall Energy will continue to assess accessibility needs in response to operational changes, system updates, employee feedback, and evolving accessibility standards.