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|---------------|-----------------------------|----------------|------------|------------------------------------------------------------------------------------|
| POLICY TITLE  | Accessibility Policy & Plan | EFFECTIVE DATE | 2017-01-01 |  |
| POLICY NUMBER | HR-POL-09-02                | REVISION NO.   | 01         |                                                                                    |
| POLICY OWNER  | VP, Human Resources & EHS   | REVISION DATE  | 2026-01-08 |                                                                                    |

## 1. PURPOSE / BACKGROUND

### Accessibility Policy

QM Environmental is committed to fostering an inclusive, accessible and barrier-free environment for people with disabilities across all jurisdictions in which we operate. We are dedicated to meeting the accessibility needs of employees, job applicants, customers, contractors and visitors in a manner that respects dignity, independence, integration and equal opportunity. In accordance with the applicable provincial legislation, we will identify, remove and prevent barriers to accessibility in our policies and procedures.

We are committed to creating an inclusive and accessible environment, delivering goods and services in a manner that upholds the principles of dignity, independence, integration, and equal opportunity. This includes enabling the use of assistive devices, permitting service animals and support persons where required, and providing timely notice of any service disruptions. All employees will receive training to ensure respectful interaction and appropriate accommodation of individual needs. Furthermore, QM Environmental maintains an accessible feedback process and will provide this policy in alternative formats upon request.

As required, QM Environmental has developed a written comprehensive Accessibility Policy and Plan for our operations. This plan:

- Creates an inclusive and accessible environment
- Provides accessible employment services for persons with disabilities
- Identifies barriers to accessibility
- Outlines actions we will take to remove and prevent these barriers
- Is reviewed regularly and updated at least once every three years
- Is available in accessible formats upon request

QM Environmental has implemented an Accessibility Policy and Plan in alignment with these standards. These documents outline our commitment to equitable service delivery, inclusive hiring practices, and accessible communication formats. Our plan is reviewed annually and updated at least once every five years.

In addition to notifying our employees about this policy, we have also implemented training for jurisdictions in which it is legally required. All training provided will meet or exceed provincial legislative requirements.

While these policies are identified and meant to ensure compliance with applicable provincial legislation, we strive to maintain an accessible workplace for all of our employees and customers.

## 2. COMMITMENT TO ACCESSIBLE SERVICE

QM Environmental has a longstanding commitment to excellence in customer service and to treating all individuals in a manner that allows them to maintain their dignity and

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independence. In keeping with this commitment and in compliance with provincial, Customer Service Standards and applicable Human Rights legislation, we ensure our accessibility measures extend to:

- Clients, customers, and visitors
- Job applicants and employees
- Contractors and business partners

#### **Our accessibility Policy and Plan ensures that:**

- Our employees receive accessibility awareness training.
- Our policy, plan and accommodation procedures are communicated and acknowledged by all employees.
- We have a process to identify and prioritize the removal of barriers for persons with disabilities.
- We have a process in place to ensure the safety of employees and visitors with disabilities during emergency situations.
- We have a process in place to communicate planned or unexpected disruption to services or facilities for customers with disabilities and establishes a process to will promptly notify the customers or client. This notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. The notice will be placed in a convenient and visible location.
- We provide customers who wish to provide feedback to QM Environmental on the provision of goods and services to people with disabilities can provide feedback via email, in person, verbally or in writing. All feedback will be directed to the head of Human Resources and communicated with all Senior Management.
- QM welcomes people with disabilities and their service animals. Service animals are allowed on parts of our premises that are open to the public. A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises in all public areas.

#### **Accessibility Resources and Feedback**

Our Accessibility Policy and Plan are available on our website and in accessible formats upon request. We welcome feedback to help us improve accessibility.

#### **To provide feedback or request accessibility support, please contact:**

Human Resources – Accessibility  
Email: [human.resources@qmenv.com](mailto:human.resources@qmenv.com)  
Phone: (416) 253-6000

### **3. SCOPE**

All Canadian operations, including employees, visitors, customers and contractors

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#### 4. FREQUENCY

The Accessibility Policy will be reviewed on a regular basis to monitor progress in identifying and removing barriers. It will be reviewed at least annually and updated every five years.

#### 5. RESPONSIBILITIES

##### VP, HR & EHS

- Responsible for developing, maintaining, and communicating this policy and plan.

##### Human Resources

- Responsible for incorporating the HR sections of this plan into their operations.
- Review potential barriers for people with disabilities and make recommendations for improvement;
- Review feedback received internally and externally regarding barriers to people with disabilities and respond accordingly.
- Monitor the implementation and ongoing compliance with the five standards outlined in the Accessibility for Ontarians with Disabilities Act, 2005; Accessibility Standards for Customer Service Ontario regulation 429/07 the Accessibility for Manitobans Act and any other legislation as required.
- Update the Accessibility Plan, and following executive approval, make the plan available internally and to the public.

#### 6. PROCEDURE

##### 6.1 Barrier Identification & Prioritization

This plan establishes a method to identify, measure, remove, and prevent barriers to persons with disabilities.

##### 6.1.1 Barrier Identification

Potential barriers will be identified by Human Resources. They may also be identified through feedback from employees and visitors to QM. Identified barriers will be logged below and their status will be updated (at least) annually. This log is maintained by the Head of HR & EHS.

##### 6.1.2 Barrier Prioritization

Approved accessibility projects will be incorporated into annual capital and operating plans. Criteria for establishing priorities include the following:

- Requirement of legislation
- Number of people affected by a barrier
- Availability of a practical solution that can be readily implemented
- Availability of a way to avoid a barrier (i.e. work around it)
- Availability of resources required to remedy a barrier (i.e., timing/phasing, factor/cost)
- Magnitude of risk posed by a barrier (i.e. estimated severity of the barrier)

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## 6.2 Barrier Log, Prioritization & Planning

| Type of Barrier                                                                                                                                                              | Actions Take                                                                                                                                                                                                                  | Responsibility    | Due Date  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-----------|
| <b>Attitudinal barriers</b> may result in people with disabilities being treated differently than people without disabilities.                                               | <ul style="list-style-type: none"> <li>Training as part of our onboarding to provide awareness</li> </ul>                                                                                                                     | HR                | Ongoing   |
| <b>Informational and communication barriers</b> arise when a person with a disability cannot easily receive and/or understand information that is available to others.       | <ul style="list-style-type: none"> <li>Website is updated to ensure it meets accessibility standards. Provide communication in different forms including video, and closed captioning / notes features in meetings</li> </ul> |                   | Completed |
| <b>Systemic barriers</b> in policies, practices and procedures result in people with disabilities to being treated differently than others or sometimes excluded altogether. | Review of policies at least every 2 years and upon request for consideration as required                                                                                                                                      | All policy owners | Ongoing   |
| <b>Physical and architectural barriers</b> occurs in the environment and prevent access for people with disabilities.                                                        | <ul style="list-style-type: none"> <li>Cleared clutter from the hallways and corridors.</li> </ul>                                                                                                                            |                   | Ongoing   |
| <b>Technological barriers</b> occur when technology or the way it is used does not meet the needs of people with disabilities.                                               | <ul style="list-style-type: none"> <li>Policy and website have been updated to provide alternate methods to contact HR to review technology barriers.</li> </ul>                                                              |                   | Annually  |

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### 6.3 Emergency Response Procedures for Person with Disabilities

We have established a process for ensuring that personalized emergency procedures are developed at the workplace level (office, jobsite) for both employees and visitors.

## 7. COMMUNICATION, TRAINING & AWARENESS

- This plan is posted to the QM Environmental intranet and website. Hard copies are available upon request.
- All employees acknowledge the Accessibility policy via the LMS one time and as the policy is updated. Policy acknowledgement is issued at onboarding.
- All employees complete relevant Accessibility training based on their province of employment via the LMS at onboarding.
- All new employees are trained as part of onboarding process through an online training module on the Learning Management System.

## 8. RELATED PROCEDURES/WORK INSTRUCTIONS

## 9. FORMS/DOCUMENTS

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## 10. RECORDS

- Required government reporting every 3 years

## 11. DEFINITIONS

- 

## 12. REVISION HISTORY

| Date       | Description                                                                                                                                                                                                                                                                                                         | Revision |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 2021-06-22 | <ul style="list-style-type: none"> <li>• Converted to newly branded template</li> <li>• Reviewed and approved by new Head of Health &amp; Safety and CEO</li> <li>• Updated training and communication section</li> </ul>                                                                                           | 01       |
| 2024-08-08 | <ul style="list-style-type: none"> <li>• Updated policy to change procedure owner</li> </ul>                                                                                                                                                                                                                        | 02       |
| 2025-07-11 | <ul style="list-style-type: none"> <li>• Changed Reference to Accessibility Policy and Customer Service Standard so that it aligns to new policy.</li> <li>• Included references to AMA</li> </ul>                                                                                                                  | 03       |
| Jan 9-2026 | <ul style="list-style-type: none"> <li>• Updated to include references to Manitoba · Combined the Customer Service Policy into one Policy document with the Accessibility Policies of the Company · Removed stand-alone Customer Service Accessibility Policy</li> <li>• Updated New President &amp; CEO</li> </ul> | 04       |

## 13. APPROVAL

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APPROVED BY:

Jon DiMascio

President & CEO

02/19/2026

DATE



Jon DiMascio (Feb 19, 2026 08:48:20 EST)

SIGNATURE

Jasmyn Kozlowsky

Vice President, Human Resources & EHS

02/19/2026

DATE



SIGNATURE

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