



Nobleton Lakes Golf Course Ltd. Multi-year Accessibility Plan

Message from the President and CEO

I am proud to present the Nobleton Lakes Golf Course Ltd.'s 2022-2027 Multi Year Accessibility Plan, which provides details on our commitment to creating an equitable and inclusive experience for our customers, employees and suppliers.

Nobleton Lakes Golf Course Ltd. recognizes the value and contribution of persons with disabilities within our organization and the steps we must take in serving our customers with disabilities in a barrier-free environment. This applies not only to our brick-and-mortar retail environments, but also to our digital properties, which have become an increasingly popular channel.

There have been significant improvements and accomplishments at Nobleton Lakes Golf Course Ltd. in how we have integrated accessibility into the fabric of our culture, and I look forward to further advancements and collaboration to ensure we remain a best-in-class organization.

Nobleton Lakes Golf Course Ltd. is proud to serve the citizens of Ontario, and our commitment to Diversity, Inclusion, Belonging, and Equity extends into everything we do. Through our journey with the commitments outlined in our Multi Year Accessibility Plan, Nobleton Lakes Golf Course Ltd. aims to exceed in creating an inclusive, equitable and barrier-free environment for our customers, employees and suppliers.

Sincerely,

Chris Torkos
President, Nobleton Lakes Golf Course Ltd.

Introduction and Commitment

Nobleton Lakes Golf Course Ltd. is committed to excellence as an organization under the guidance of three key strategic priorities:

- Excellence in Customer Experience
- Excellence in Operational Efficiency
- Excellence in Employee Experience

As part of this commitment, Nobleton Lakes Golf Course Ltd. is dedicated to providing an accessible and inclusive experience for customers, staff and business partners when accessing Nobleton Lakes Golf Course Ltd. services, information or facilities.

This Multi Year Accessibility Plan, as mandated through the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), outlines Nobleton Lakes Golf Course Ltd.'s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the Integrated Accessibility Standards Regulation (IASR). Nobleton Lakes Golf Course Ltd. will champion and drive accessibility within the organization to ensure the organization meets or exceeds compliance as legislated by the AODA.

Nobleton Lakes Golf Course Ltd.'s Multi Year Accessibility Plan outlines how Nobleton Lakes Golf Course Ltd. will fulfil its commitment to accessibility under the following standards:

- General Requirements
- Information and Communication
- Customer Service
- Employment
- Design of Spaces

As part of Nobleton Lakes Golf Course Ltd.'s commitment to persons with disabilities and as outlined by IASR, Nobleton Lakes Golf Course Ltd. will:

- Review and update Nobleton Lakes Golf Course Ltd.'s Multi Year Accessibility Plan every 5 years
- Report progress in meeting the commitments outlined in this plan on an annual basis
- Review and update Nobleton Lakes Golf Course Ltd.'s Multi Year Accessibility in consultation with persons with disabilities
- Post this plan in a format meets accessibility requirements and, where request, provide a version in an alternate format to accommodate a user with disabilities who cannot consume the content in the current accessible format

Guiding Principles

Leading by Example

Nobleton Lakes Golf Course Ltd. will lead by example by meeting and/or exceeding legislative standards in achieving best practices in accessibility rather than baseline compliance. Nobleton Lakes Golf Course Ltd. will establish accountability within our processes and procedures in fostering an organization that is inclusive to persons with disabilities using an approach that respects dignity and independence.

Accessibility by Design

Nobleton Lakes Golf Course Ltd. will build accessibility considerations into our culture, incorporating accessibility as a key requirement from the outset rather than as an afterthought. This means building accessibility as a driver in our project planning, procurement strategy, retail environments, employee experience and customer service.

Diversity, Inclusion, Belonging and Equity

Nobleton Lakes Golf Course Ltd. is committed to fostering an organizational culture that is respectful, equitable and inclusive of all persons. This includes the commitment of a barrier-free and dignified environment for all our customers, employees and suppliers with disabilities.

Collaboration and Partnership

Nobleton Lakes Golf Course Ltd. will include direct, clear, and plain language in all our partnership agreements that reflects Nobleton Lakes Golf Course Ltd's commitment to meeting and/or exceeding legislative standards as outlined in the AODA. Nobleton Lakes Golf Course Ltd. will ensure that accessibility is a mandatory and non-negotiable requirement in our business partnerships and hold our suppliers accountable on our common commitment to accessibility.

Commitments and Outcomes

Nobleton Lakes Golf Course Ltd. is continually working to ensure that our services, information and facilities are available in an inclusive and equitable way for customers, staff and vendors.

The commitments outlined below as part of Nobleton Lakes Golf Course Ltd. Multi Year Accessibility Plan 2022-2027 are either in-progress or will be initiated during the 5-year term, with the goal of satisfying all commitments by the end of 2027.

Nobleton Lakes Golf Course Ltd. will report on progress annually for each of the commitments as part of this plan.

Design of Public Spaces

Initiatives

- Completed as of December 2022: Nobleton Lakes Golf Course Ltd. will meet, at a minimum, guidelines as detailed in the Barrier-Free Design portion of the Ontario Building Code and in the IASR, Section 80.1 through to Section 80.5.
- In-Progress as of December 2022: Nobleton Lakes Golf Course Ltd. will contain specific, clear and direct language on the obligations and responsibilities to public spaces within the AODA, including:
 - accessible parking
 - exterior paths of travel
- Completed as of December 2022: Nobleton Lakes Golf Course Ltd. will incorporate an ‘accessibility-by-design’ approach when planning the retail environment of our existing store.

Outcomes

- Barrier-free access to Nobleton Lakes Golf Course Ltd.’s facilities for customers, employees and suppliers.
- Improved accessibility of public and employee spaces realized through an accessibility by design approach in current facility.

Training

Initiatives

- Completed as of December 2022: All new Nobleton Lakes Golf Course Ltd. employees will complete mandatory AODA training as part of their onboarding process. This course will be managed and updated periodically by Nobleton Lakes Golf Course Ltd. to reflect any changes or advancements in the AODA.
- Not Yet Started as of December 2022: All existing Nobleton Lakes Golf Course Ltd. employees will be required to take refresher AODA training on a scheduled basis as part of their annual learning track. This course will be managed and updated periodically by Nobleton Lakes Golf Course Ltd. to reflect any changes or advancements in the AODA
- In-Progress as of December 2022: Nobleton Lakes Golf Course Ltd. employees that manage content will be provided guidance and leadership in creating accessible documents by design (i.e., Word, PowerPoint, Excel, PDF, etc.), supported through instructional materials, techniques, and tools

Outcomes

- Nobleton Lakes Golf Course Ltd. employees are aware and embrace their responsibility in creating an accessible organization and culture.

- Accessible documents and artefacts will be authored using an Accessible by Design approach, ensuring that accessibility is built into Nobleton Lakes Golf Course Ltd. processes. This allows Nobleton Lakes Golf Course Ltd. employees with disabilities who do not wish to disclose to readily access and consume shared artefacts in an equitable and inclusive approach.

Customer Service

Initiatives

- Completed as of December 2022: Review and update Nobleton Lakes Golf Course Ltd. Accessibility Policy to reinforce and promote requirements and criteria that support accessible customer service.
- Completed as of December 2022: When delivering products, services or information to the public, suppliers or employees will incorporate both hardware and software accessibility features to ensure equitable and inclusive use, at no extra cost to the user.
- Completed as of December 2022: Persons with disabilities who require accommodation, alternative formats, communication supports or use assistive technology will not be charged a fee or be responsible for additional costs related to accessing Nobleton Lakes Golf Course Ltd.'s products, services, information and facilitates.
- Not Yet Started as of December 2022: Create a compliance management framework which identifies and tracks accessibility initiatives within Nobleton Lakes Golf Course Ltd. ,both public-facing and employee-facing.
- Completed as of December 2022: Update all Nobleton Lakes Golf Course Ltd. Accessibility policies and procedures to reflect changes or advancements in the legislation, as applicable.

Outcomes

- Nobleton Lakes Golf Course Ltd. will be recognized as an organization that leads by example in creating barrier-free, inclusive and equitable access to its services and information.
- People with disabilities will access Nobleton Lakes Golf Course Ltd. services and information with the same quality and timeliness as all individuals.
- Continuous, data-driven improvement on accessibility compliance.

Procurement

Initiatives

- Completed as of December 2022: Ensure that all procurement documents, from initial RFX through to final agreements and contracts, include mandatory accessibility criteria with accountable, clear and direct language as to the expectations of third parties where Nobleton Lakes Golf Course Ltd. engages in a relationship.
- Completed as of December 2022: As part of a larger project management gating process, analysis and review of accessibility criteria and considerations for all projects and initiatives at the inception stage, so that any solutions or concepts that do not meet accessibility compliance are reconsidered.
- Completed as of December 2022: Communicate to existing vendors and suppliers on Nobleton Lakes Golf Course Ltd.'s commitment to meeting or exceeding AODA compliance and, where possible, collaborate in good faith on addressing any current gaps in accessibility.

Outcomes

- Accessibility is engrained into all Nobleton Lakes Golf Course Ltd.'s service and information offerings, both delivered by Nobleton Lakes Golf Course Ltd. directly All customer, employees and suppliers can access Nobleton Lakes Golf Course Ltd. services and information in a barrier-free, equitable and inclusive way.

Employment

Initiatives

- Completed as of December 2022: Any Nobleton Lakes Golf Course Ltd. job applicant, current employee shall be proactively notified of available accessible accommodation and provided with accessible formats or alternatives:
 - during the recruitment, assessment and selection process for an employee or contractor role
 - during the notification of success for an employee or contractor role
 - during the onboarding process as both of onboarding activities and also the commitment of Nobleton Lakes Golf Course Ltd. to accommodate them throughout the duration of their employment with Nobleton Lakes Golf Course Ltd., where required
 - when providing information that is needed to perform a job or fulfill a scope of work and/or information that is available to all employees in the organization
- In Progress as of December 2022: As part of Nobleton Lakes Golf Course Ltd.'s Human Resources processes and practices, Nobleton Lakes Golf Course Ltd. employees have the opportunity to discuss accommodation and their disability through:
 - individual accommodation plan
 - return to work process
 - performance Management
 - career development and advancement
 - any redeployment
- Completed as of December 2022: Nobleton Lakes Golf Course Ltd. will prepare individualized emergency response information from persons with disabilities at our facility.

Outcomes

- Nobleton Lakes Golf Course Ltd. employees with disabilities, either visible or invisible, will be able to fully participate in an equitable and inclusive way at Nobleton Lakes Golf Course Ltd. and have the necessary tools and supports to do their jobs without barriers.
- Nobleton Lakes Golf Course Ltd. will readily provide employees with disabilities alternative formats and accommodations using a process that is efficient and responsive.

Information and Communications

Initiatives

- Not Yet Started as of December 2022: Nobleton Lakes Golf Course Ltd. managed tool will be available for persons with disabilities to provide feedback on their ability to use Nobleton Lakes Golf Course Ltd.'s products, services, information and facilitates. This mechanism will be available to the public, employees and suppliers. Any feedback will remain confidential, unless contact information has been volunteered.
- In-Progress as of December 2022: Nobleton Lakes Golf Course Ltd. public-facing websites and web applications will meet or exceed the Web Content Accessibility Guidelines (WCAG) standards outlined in the IASR.
- Completed as of December 2022: Ensure alignment with any new Nobleton Lakes Golf Course Ltd. digital-first projects to confirm that accessibility requirements are built in from the start as a mandatory requirement, rather than an afterthought.
- Completed as of December 2022: Readily notify the public about the availability of alternative formats and accommodations, where available, and ensure that Nobleton Lakes Golf Course Ltd. has a process in place to provide the alternative format or accommodation efficiently and effectively in a reasonable timeframe.
- Completed as of December 2022: Any planned service disruption, either by Nobleton Lakes Golf Course Ltd., supplier to Nobleton Lakes Golf Course Ltd. or partners who supply services on behalf of Nobleton Lakes Golf Course Ltd. will be communicated and posted as soon as known and a contact for further information will accompany any notice. Additionally, where available, an alternative for accessing the suspended service will be posted or available.

Outcomes

- Barrier-free access to Nobleton Lakes Golf Course Ltd.'s digital services and information for customers, employees and suppliers.
- Responsive and efficient fulfilment of alternative format requests.
- Continuous improvement on how Nobleton Lakes Golf Course Ltd. can best serve our customers, employees and suppliers with disabilities.

Conclusion

Nobleton Lakes Golf Course Ltd. continues to work in identifying and removing accessibility barriers and creating an inclusive and equitable environment. Nobleton Lakes Golf Course Ltd. is dedicated to achieving and/or exceeding the commitments as outlined in this Multi Year Accessibility Plan and will report annually on the progress of these commitments.

Additionally, Nobleton Lakes Golf Course Ltd. will provide bi-annual compliance reports to the Accessibility Directorate of Ontario as mandated by the AODA.

Nobleton Lakes Golf Course Ltd. looks forward to ongoing collaboration and partnership with the disability community in working towards maximum accessibility in everything we do.

Contact

For general inquiries or to request an alternate format of this plan, please contact:

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