



RIVERSTONE RETIREMENT COMMUNITIES

Multi-Year Accessibility Plan

Our strategy to prevent and remove barriers and to meet the requirements of the Integrated Accessibility Standards Regulation (O. Reg. 191/11) under the Accessibility for Ontarians with Disabilities Act, 2005

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1. Statement of Commitment

Riverstone Retirement Communities (“Riverstone”) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting, in a timely manner, the accessibility needs of persons with disabilities — residents, prospective residents, families and friends, visitors, employees, volunteers, job applicants and contractors — by identifying, preventing and removing barriers.

This Multi-Year Accessibility Plan (the “Plan”) sets out how Riverstone will do that over the period covered by the Plan, and how it will meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and the *Integrated Accessibility Standards Regulation*, O. Reg. 191/11 (the “IASR”).

2. Purpose, Scope and Legal Basis

The IASR requires large private-sector organizations to establish, implement, maintain and document a multi-year accessibility plan that outlines the organization’s strategy to prevent and remove barriers and to meet the requirements of the IASR. The plan must be posted on the organization’s website, provided in an accessible format on request, and reviewed and updated at least once every five years. This Plan meets those requirements.

- The Plan applies to every Riverstone community, and to all employees, volunteers and persons who provide goods, services or facilities on Riverstone’s behalf.
- It is a companion to the Riverstone Accessibility Policy (AODA), which sets out Riverstone’s policies, practices and procedures. The Policy says what Riverstone does; the Plan says how and when Riverstone will close gaps and keep improving.
- The Plan does not replace or limit Riverstone’s obligations under the *Human Rights Code* or any other law respecting accommodation of persons with disabilities.

3. Governance and How This Plan Was Developed

Riverstone’s Accessibility Committee is responsible for developing, implementing and maintaining this Plan and for tracking progress. Our Support Office leadership approves the Plan and ensures it is resourced. In each of our communities General Managers are responsible for putting the Plan into practice.

- **Input received:** in developing this Plan, Riverstone considered input from our residents and feedback from resident council meetings, families, employees, volunteers, persons with disabilities, accommodation requests, and our complaints/feedback logs.
- **Ongoing input:** Riverstone will continue to seek input from persons with disabilities wherever practicable, including through the feedback process, community walkthroughs and resident and family forums.

4. Our Approach: Identify, Prioritize, Remove, Monitor

4.1 Identify barriers

Barriers can be physical, informational or communication-related, systemic (established practices) or attitudinal. Riverstone will look for them before problems arise, using:

- Walk throughs of our building with the Joint Health and Safety Committee monthly
- the Feedback/Complaint Tracking Logs at each community, reviewed annually
- accommodation requests and Individual Accommodation Plans, to spot patterns (without disclosing personal information);
- accessibility testing of public websites and documents;
- input from residents, families, employees and volunteers; and
- an accessibility review before any construction, redevelopment or significant purchase.

Every barrier identified is recorded at the community level and addressed.

4.2 Prioritize

Priority	Applies when	Target for action
High	A safety or health risk; a legal requirement not yet met; a barrier that prevents a resident's access to essential services or independence.	Within 12 months, or immediate if posing a severe health and/or safety risk
Medium	A barrier that limits use or enjoyment of services or facilities for a number of people.	Within 1 – 3 years
Low	A barrier or improvement that can be scheduled with other planned work.	As indicated

Where a barrier cannot be removed immediately, Riverstone will put an interim accommodation in place and, where required, give notice of the disruption.

4.3 Remove and prevent

Actions are recorded in the Barrier Removal Action Plan, a target timeframe and a status. Riverstone will build accessibility into capital planning, procurement, policy development and communications so that new barriers are not created.

4.4 Monitor and report

The leadership team and AODA designate will review progress as needed and update the status at least annually. Riverstone will also file its Accessibility Compliance Report with the Government of Ontario every three years and keep an evidence file to support it.

5. Communicating, Reviewing and Updating This Plan

- **Posting.** This Plan is posted on Riverstone's website at riverstoneretirement.com. Notice that the Plan is available is posted at each Community.

- **Accessible formats.** On request, Riverstone will provide this Plan in an Accessible Format or with Communication Supports, in a timely manner and at no more than the regular cost charged to other persons, after consulting with the person about what will work for them.
- **Review.** This Plan will be reviewed and updated at least once every three years, and sooner if legislation, Riverstone's operations or its buildings change significantly.
- **Feedback.** Feedback about this Plan is welcome through Riverstone's accessible feedback process.

6. Approval and Contact

Questions about this Plan, requests for an Accessible Format, and feedback may be directed to:

Name and title	Ashley VanDoorn, Regional Director of Operations
Telephone	613-324-6589
Email	avandoorn@riverstoneretirement.ca
Mailing address	505 Preston Street, Ottawa, ON K1S 4N7

Approved by:	Signature: _____
Date: September 2026	Plan period: September 2026 – September 2029

7. Compliance Status by Standard

This table lists each requirement Riverstone must meet, what Riverstone does to meet it, who is responsible, and the current status. Statutory deadlines are those that apply to large organizations. The Accessibility Committee updates the status column at each review.

General Requirements

Requirement	Riverstone's commitment and ongoing activities	Responsibility	Statutory deadline	Status
Accessibility policies	Maintain the Accessibility Policy, including a statement of commitment to meeting the accessibility needs of persons with disabilities in a timely manner. Make it publicly available on the website and at each Community and provide it in an Accessible Format on request. Review at least annually.	Accessibility Committee; Executive Leadership	Jan 1, 2014	☐ Completed: Policy updated September 2026
Multi-year Accessibility Plan	Maintain this Plan. Post it on the website and provide it in an Accessible Format on request. Review and update at least once every five years.	Accessibility Committee	Jan 1, 2014	☐ Completed: September 2026
Procurement	Incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, except where not practicable; provide an explanation on request.	Procurement; Community General Managers	In force	☐ Ongoing
Self-Service Kiosks	Have regard to accessibility when designing, procuring or acquiring self-service kiosks, including point-of-sale and payment devices.	Procurement; IT	Jan 1, 2014	☐ Completed
Training	Train all employees, volunteers, persons who develop Riverstone's policies, and others who provide goods, services or facilities on Riverstone's behalf on the IASR, the Human Rights Code as it relates to persons with disabilities, the Policy and serving persons with disabilities. Train as soon as practicable, on policy changes and on an ongoing basis. Keep records of training content, dates and numbers. Give a description of the training to any person on request.	Human Resources; Accessibility Committee	Jan 1, 2015 (IASR); Jan 1, 2012 (Customer Service)	☐ Ongoing: all employees and volunteers complete upon hire and annually on ORCA.
Accessibility Compliance Report	File the report every three years, certified by a senior officer. Retain a copy and filing confirmation and make the report available to the public.	Executive Leadership; Accessibility Committee	Dec 31, 2014, then every 3 years (next Dec 31, 2026)	☐ Completed: September 2026 for all Riverstone communities

Customer Service Standards

Requirement	Riverstone's commitment and ongoing activities	Responsibility	Statutory deadline	Status
Policies, practices and procedures; assistive devices; communication	Maintain policies for serving persons with disabilities. Allow use of personal assistive devices. Communicate in a manner that takes the person's disability into account.	Community General Managers; all staff	Jan 1, 2012	☐ Completed & Ongoing: all policies up to date and communication/use of devices is ongoing
Service animals and support persons	Welcome guide dogs and service animals, and support persons, in areas open to the public. Explain and offer alternatives if an animal is excluded by law. Give advance notice of any support-person admission fee; waive the fee where a support person is required.	Community General Managers; all staff	Jan 1, 2012	☐ Completed
Notice of temporary disruptions	Post notice of planned or unexpected disruptions of facilities or services used by persons with disabilities, stating the reason, expected duration and alternatives. Use the Riverstone template.	Community General Managers; Facilities	Jan 1, 2012	☐ Completed
Feedback process	Maintain an accessible process for receiving and responding to feedback (in person, by phone, in writing, by email or on USB). Provide Accessible Formats and Communication Supports on request and notify the public. Record feedback in the tracking log; review it annually.	Accessibility Committee; Community General Managers	Jan 1, 2012 (Customer Service); Jan 1, 2015 (Information & Communications)	☐ Completed Part of our complaints logs at each community
Documents on request	Provide the Policy, this Plan and the training description to any person on request, in an Accessible Format, in a timely way and at no extra cost. Notify the public that they are available.	Accessibility Committee; Communications	Jan 1, 2012 (Customer Service); Jan 1, 2016 (Information & Communications)	☐ Completed

Information and Communications Standards

Requirement	Riverstone's commitment and ongoing activities	Responsibility	Statutory deadline	Status
Accessible Formats and Communication Supports	On request, provide or arrange Accessible Formats and Communication Supports in a timely manner that takes the person's needs into account, at no more than the regular cost, after consulting with the person. Notify the public of their availability.	Communications; all staff	Jan 1, 2016	☐ Completed
Emergency plans, procedures and public safety information	Provide emergency plans, procedures and public safety information available to the public in an Accessible Format or with Communication Supports, on request, as soon as practicable.	Facilities; Community General Managers	Jan 1, 2012	☐ Completed

Employment Standards

Requirement	Riverstone's commitment and ongoing activities	Responsibility	Statutory deadline	Status
Recruitment — general notice	Notify the public and employees that accommodation is available for applicants with disabilities (job postings, careers page).	Human Resources	Jan 1, 2016	☐ Completed & Ongoing
Recruitment — assessment or selection	Notify applicants selected for assessment that accommodation is available on request; consult and provide suitable accommodation.	Human Resources; hiring managers	Jan 1, 2016	☐ Completed & Ongoing
Notice to successful applicants	Notify successful applicants of Riverstone's policies for accommodating employees with disabilities when making the offer.	Human Resources	Jan 1, 2016	☐ Completed & Ongoing
Informing employees of supports	Inform employees of policies that support employees with disabilities, including job accommodations; inform new employees as soon as practicable; update when policies materially change.	Human Resources	Jan 1, 2016	☐ Completed & Ongoing
Accessible formats and supports for employees	On request, consult with the employee and provide job-related and workplace information in an Accessible Format or with Communication Supports.	Human Resources; managers	Jan 1, 2016	☐ Completed & Ongoing
Workplace emergency response information	Provide individualized emergency response information to employees whose disability requires it; with consent, designate a colleague to assist; review on relocation, plan review and general emergency policy review.	Human Resources; Facilities	Jan 1, 2012	☐ Completed & Ongoing
Documented individual accommodation plans	Maintain the written process for developing individual accommodation plans and communicate it to managers.	Human Resources	Jan 1, 2016	☐ Completed & Ongoing
Return-to-work process	Maintain the documented return-to-work process for employees absent due to disability who require accommodation as required.	Human Resources	Jan 1, 2016	☐ Completed & Ongoing
Performance management, career development and redeployment	Take accessibility needs and individual accommodation plans into account in performance management, career development and advancement, and redeployment.	Human Resources; managers	Jan 1, 2016	☐ Completed & Ongoing

Design of Public Spaces Standards

Requirement	Riverstone's commitment and ongoing activities	Responsibility	Statutory deadline	Status
Construction and redevelopment of public spaces	Ensure new or redeveloped public spaces meet the Design of Public Spaces requirements: parking, service counters and waiting areas, exterior paths of travel, recreational trails, beach access routes, outdoor eating areas and outdoor play spaces, where applicable. Complete an accessibility design review before each project.	Facilities; Accessibility Committee	Jan 1, 2017	☐ Completed & Ongoing
Maintenance of accessible elements	Carry out preventative and emergency maintenance of accessible elements	Facilities; Community General Managers	Jan 1, 2017	☐ Completed & Ongoing

8. Barrier Removal Action Plan

The actions below are a starting point for the plan period. “Year 1” to “Year 5” are counted from the start of the plan period.

#	Focus area	Action	Responsibility	Target	Status
1	Governance	Confirm Accessibility Committee membership include a resident or family representative, if possible and, where practicable, a person with a disability. Set an annual reporting calendar to review JHSC and Complaints at each community.	AODA Designate	Ongoing – starting Year One	In Progress
2	Barrier assessment	Complete a baseline walkthrough of every Community using the Appendix A checklist. Record every barrier in the JHCS logs and address as needed.	Community General Managers; JHSC Committees	Ongoing – starting Year One	☐ In progress & Ongoing
3	Built environment	Inventory accessible parking, service counters, waiting-area seating, exterior paths, and outdoor amenities against the Design of Public Spaces requirements.	Facilities	Ongoing	☐ In progress
4	Built environment	Ensure that that every construction or redevelopment project is complaint with new standards	Communities; Construction; Leadership team	Ongoing	☐ In Progress
5	Maintenance	Adopt the preventative maintenance at each Community; start maintenance and disruption logs.	Facilities	Ongoing – starting Year One	☐ In progress
6	Maintenance	Test the emergency maintenance and temporary-disruption procedure at each Community (for example, a mock elevator outage); Code Grey is conducted annually. Generator testing is conducted annually.	Community General Managers	Ongoing – starting Year One	☐ In progress
7	Information and communications	Create ready-to-go Accessible Formats (large print and accessible electronic) of the most requested materials, such as the resident handbook, menus, activity calendars and emergency and evacuation information. Adopt accessible document templates.	Communications; Community General Managers	Ongoing – starting Year One	☐ In progress
8	Feedback	Post the accessible feedback and formats notice at every Community and on the website.	Accessibility Committee; Community General Managers	Ongoing – starting Year One	☐ In progress
9	Training	Deliver or refresh accessibility training for all employees, volunteers and contractors; conducted as part of our training with ORCA for all employees and volunteers.	Human Resources	Ongoing – starting Year One	☐ In progress

#	Focus area	Action	Responsibility	Target	Status
10	Employment	Confirm job posting templates, interview invitations, offer letters and orientation materials contain the required accommodation notices; brief managers on the individual accommodation plan and return-to-work process.	Human Resources	Completed and ongoing	☐ Complete
11	Employment	Confirm a process is in place to identify employees who need individualized workplace emergency response information and to review it when required.	Human Resources; Communities	Completed and ongoing	☐ Complete
12	Emergency information	Confirm emergency, evacuation and public safety information can be provided in accessible formats on request, and that residents' individual communication and mobility needs are considered in emergency planning.	Community General Managers	Completed and ongoing	☐ Complete
13	Service practices	Give front-line staff a quick guide to service animals, support persons, assistive devices and temporary-disruption notices; post notices of accessible features and measures available at each Community.	Community General Managers	Completed and ongoing	☐ Complete
14	Priority barriers	Remove or interim-accommodate every High priority barrier in the Barrier Register; schedule Medium and Low priority barriers into budgets.	Community General Managers	Years 1 -3	☐ In progress
15	Reporting and review	File the Accessibility Compliance Report by the deadline; keep the audit evidence file current; report progress to Leadership annually; carry out the five-year review of this Plan.	Accessibility Committee; Executive Leadership	Year 5 and ongoing	☐ In progress

9. Maintenance of Accessible Elements

Poor maintenance creates barriers. This Section documents Riverstone's procedures for preventative and emergency maintenance of the accessible elements of its public spaces, and for what to do when those elements are not available.

9.1 Preventative maintenance

Accessible element	What is checked	Frequency	Responsible
Elevators and lifts	Operation, levelling, controls, audible and visual signals, emergency communication	Daily visual checks; contract with TKE	Communities & contracted service provider
Accessible entrances and automatic door operators	Operation, timing, sensors, clear width, thresholds, push-button activation	Daily visual checks	Communities
Ramps, handrails, railings and grab bars	Secure fastening, damage, surface, slip resistance, clear of obstructions	Monthly visual checks	Communities – Preventative Maintenance Checklist
Accessible parking	Type A and Type B spaces, access aisles, signage, markings, clear of snow and vehicles not entitled to use them	Weekly visual checks; daily in winter for proper parking permits	Communities and contractor for snow clearing
Exterior paths of travel	Firm, stable, slip-resistant surface; drainage grates; changes in level; lighting; overhead hazards; rest areas; snow and ice clearing	Weekly visual checks; daily in winter for proper parking permits	Communities and contractor for snow clearing
Accessible washrooms	Fixtures, grab bars, emergency call devices, clear floor space	Weekly visual checks;	Communities; housekeeping (hskp has forms to sign off on)
Service counters and waiting areas	Accessible counters clear and marked – reception and bistro areas are clear	Daily visual checks	Community General Managers; reception & servers
Hearing and communication aids	Assistive listening devices, TTY or relay options, call systems in working order, if onsite	Monthly checks	Communities and IT as required
Outdoor amenities	Eating areas, walkways, surfaces, clear routes, etc	Weekly visual checks; daily in winter for safe walking	Communities and contractor for snow removal

9.2 Emergency maintenance

When an accessible element fails or is found to be unsafe:

- **Report.** Any employee or volunteer who becomes aware of a failure reports it immediately to the General Managers

- **Make safe.** The GM makes the area safe (for example, by barricading or signing a hazard) and arranges temporary assistance for anyone affected.
- **Notify.** The General Managers ensures a notice of temporary disruption is posted (Section 9.3) and that affected residents, families and staff are told.
- **Repair.** The community will arrange repair or replacement and responds within reasonable timeframe. Repairs affecting safety or essential access are treated as urgent.
- **Verify and record.** After repair, the community confirms the element works and records the failure, the dates and the action taken in the maintenance log.
- **Learn.** The General Manager reviews recurring failures and adds preventative actions or building repairs to the Barrier Removal Action Plan.

9.3 When an accessible element is not available

Whether the disruption is planned (such as maintenance or construction) or unexpected, Riverstone communities will:

- post a notice at the entrance to the affected premises and at service counters, and, where appropriate, on the Community's page of the website and by notice to residents and families;
- state the reason for the disruption, its expected duration and the alternative route or services available
- put an alternative in place, such as an alternate accessible route or entrance, temporary accessible parking closest to an entrance, relocating a service or activity to an accessible location, or staff assistance; and
- record the disruption in the log, update the notice if the duration changes, and remove it when service is restored.