ONTARIO ELECTRICITY FINANCIAL CORPORATION

OEFC ACCESSIBILITY POLICY

Last Updated: July 2026

OEFC Accessibility Policy

1.0 PURPOSE

This policy describes OEFC's commitment to respect the dignity and independence of persons with disabilities and outlines our multi-year plan to comply with the *Accessibility for Ontarians with Disabilities Act* (AODA).

2.0 SCOPE

This policy, together with Appendix A: Multi-Year Plan 2026-2031, is a requirement under the AODA that outlines the actions the OEFC will take to improve opportunities for people with disabilities. The creation of this policy complies with the Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) (IASR), which applies to Information and Communications, Employment, Transportation, Design of Public Spaces, and Customer Service. As OEFC does not provide Transportation or Design of Public Spaces, these two categories are not addressed in this policy.

As OEFC has no employees, designated officers of OEFC are Ontario Financing Authority (OFA) employees, and OEFC's mandate, which includes:

- managing its debt, financial risks and liabilities;
- entering into financial and other agreements relating to the supply of electricity in Ontario; and
- providing financial assistance to the successor corporations of Ontario Hydro

is carried out by OFA employees. As such, OEFC's interaction with the public is limited and, apart from providing information through its website and other means, it does not provide services to the public. Nevertheless, OEFC is committed to accessibility for persons with disabilities in performing all its functions.

3.0 POLICY RULES

3.1 STATEMENT OF COMMITMENT

OEFC is committed to ensuring equal access and participation for persons with disabilities. We are committed to treating persons with disabilities in a way that allows them to maintain their dignity and their independence. We will do so by removing and preventing barriers to accessibility and meeting the requirements under Ontario's accessibility laws.

We are also committed to meeting our ongoing obligations under the *Ontario Human Rights Code* (Code) respecting non-discrimination, and we understand that obligations under the AODA and its accessibility standards do not substitute or limit our obligations under the Code or obligations to persons with disabilities under any other law.

3.2 Compliance with OFA Accessibility Policy

As OEFC has no employees and designated/appointed officers of OEFC are OFA employees, OEFC is required to comply with the applicable provisions of the OFA Accessibility Policy (OFA Policy), as amended from time to time. For greater certainty:

- For the purposes of OEFC, all references in the OFA Policy to the OFA Policy and Multi-year Plan shall be deemed to refer to this OEFC Accessibility Policy and Multi-year Plan, and references to the OFA shall be deemed to refer to OEFC, as applicable.
- All relevant components as set out in Article 3.0 of the OFA Policy are deemed to be applicable to OEFC.
- The Roles and Responsibilities of OFA employees, contractors and temporary help as set out in Article 5.0 of the OFA Policy shall apply to OFA employees, contractors and temporary help in relation to any work performed on behalf of OEFC.
- The Training Requirements as set out in Article 3.6 of the OFA Policy and Article 5 of Appendix A to the OFA Policy shall apply to all OFA employees including designated/appointed OEFC officers, who perform work on behalf of OEFC.

For OEFC matters, in the event of a conflict between this policy and the OFA Policy, the provisions of this policy shall prevail.

4.0 MODIFICATIONS TO THIS OR OTHER POLICIES

This policy will be reviewed on an annual basis. OEFC is committed to respecting the dignity and independence of persons with disabilities. No changes will be made to this policy, or any OEFC policy, before considering the impact on persons with disabilities.

OEFC will review any OEFC policy if it is brought to its attention that the policy does not respect the dignity and independence of persons with disabilities. All OFA employees are encouraged to review OEFC policies for this purpose. If any OEFC policy is determined not to respect the dignity and independence of persons with disabilities, it will be modified or removed.

APPENDIX A: MULTI-YEAR PLAN 2026 – 2031

THE OEFC HAS COMPLETED THE FOLLOWING ACCESSIBILITY INITIATIVES:

1. Information and Communication

a) **Internet:** Except where not practicable[1], all public-facing websites created after January 1, 2012, and all content including forms and documents on those websites, conform to WCAG 2.0 Level AA. The foregoing requirements *exclude* live captioning and pre-recorded audio description.

b) **Documents.** All newly created documents and documents in any format created after January 1, 2012, that may be provided to the public, including responses to any future request under the *Freedom of Information and Protection of Privacy Act* (FIPPA), conform to accessibility standards.

THE OEFC WILL CONTINUE TO IMPLEMENT THE FOLLOWING IN ACCORDANCE WITH THE OFA ACCESSIBILITY POLICY:

1. INFORMATION AND COMMUNICATION

a) **Internet.** Ensure all new public-facing websites, including content (forms and documents) on those websites, conform to the latest acceptable WCAG level. OFA systems staff will keep abreast of new developments in accessibility for online content and will implement new technologies as they become available and assessed to be beneficial. As per subsection 14(6)(a) of the IASR, in determining whether the requirements in this section 1(a) are "practicable", it is necessary to consider, among other things, the availability of commercial software or tools or both.

b) **Documents.** Employees are encouraged to apply best practices such as creating digital documents that are readable by screen readers (i.e. created using the Microsoft Word Styles function) and paper documents in an easily legible font and font size for those with low vision. The OFA will explore the possibility of implementing the most accepted accessibility font, *Raleway*, as the default font on MS Word. If not, then *Calibri* or *Arial*, respectively, would be considered next best options.

c) **Telephone.** OEFC will accept Text Telephone (TTY) telephone calls from members of the public and other third parties using Telephone Relay Services or equivalent services. A TTY is a device used by people with hearing disabilities. Confidential government information and information protected by FIPPA should not be communicated through relay services but may be communicated internally using TTY devices, where communications by email or in person

[1] As per subsection 14(6)(a) of the O. Reg 191/11, in determining whether the requirements in section 1(a) of the Policy are "practicable", it is necessary to consider, among other things, the availability of commercial software or tools or both.

would otherwise be inappropriate.

d) **Email.** Employees are encouraged to make email communications more accessible by avoiding the use of PDF attachments when possible and instead including content inthe body of the email or a link to the HTML version.

2. OEFC PREMISES

OEFC is committed to allowing clients, employees and third parties who may access our premises (temporary help, contractors, stakeholder colleagues, etc.) to do so in a manner that considers any disability they may have.

a) **Assistive Devices.** OEFC will ensure employees who interact with third parties are familiar with assistive devices and permit the use of personal assistive devices to access our services. Assistive devices may include, but are not limited to wheelchairs, walkers, white canes, oxygen tanks, portable chalkboards, screen reading software, and electronic communication devices.

b) **Service animals and support persons.** OEFC is committed to welcoming persons with disabilities accompanied by a service animal or support person and will not restrict their access to these supports on OEFC premises.

3. PROCUREMENT

In accordance with its procurement policy, OEFC will incorporate accessibility criteria and features as required when procuring or acquiring goods, services or facilities, except where it is not practicable to do so. Where it is determined to not be practicable, OEFC will be prepared to provide a written explanation.

a) **Requests for Bids** and other related procurements such as Requests for Services will require vendors to demonstrate that they are inclusive and accessible as an employer and as a provider of goods and/or services.

b) OEFC will incorporate accessibility features when procuring or acquiring **Self-Service Kiosks.** Accessibility features may be technical, structural, and/or the access path to the kiosk. For the purposes of this section, a self-service kiosk is “an interactive electronic terminal, including a point-sale device, intended for public use that allows users to access one or more services or products or both.”

4. NOTICE OF TEMPORARY DISRUPTION

OEFC will provide notice on its external website and/or over the telephone during a planned or unexpected disruption in its services used by persons with disabilities. Notices will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

5. FEEDBACK PROCESS

Comments regarding how well our service standards for clients, candidates for employment, and third parties with disabilities are being met are welcome and appreciated. Feedback can be made by e-mail or verbally on the telephone. A general email address and phone number are available on the OEFC website. All emails and phone messages regarding accessibility will be forwarded to the attention of the OFA Human Resources Coordinator.

Individuals who submit feedback can expect to hear back within two weeks' time. OEFC will take all reasonable measures to rectify the situation regarding any complaint received. OEFC will consult with persons with disabilities through the review and consideration of feedback received.

6. Annual Status Review

OEFC will measure the success of this Multi-Year Plan by checking its progress every December. This will provide a view of what has been accomplished and what still needs to be done. The progress report will be posted publicly as part of OEFC's Multi-Year Plan.

7. PROGRESS REPORT CHART (CUMULATIVE AS OF FIRST DATE IMPLEMENTED TO JANUARY 1, 2018)

Implementation Date	General Requirements	Information & Communications	Procurement	Employment	Training
As of January 1, 2014	Accessibility Policy & Multi-Year Plan developed	Accessible feedback processes in place Will accept TTY phone calls New public-facing websites conform to WCAG 2.0 Level AA	Accessibility integrated into all Requests for Bids and other related procurements	Emergency Response Information Workplace Violence Risk Assessment Accessible Recruitment Supporting Employees Training on Accessibility – Customer Service, Ontario Human Rights Code, IASR & AODA Informing Employees	
As of January 1, 2015	Accessibility Policy & Plan updated	All documents in any format that may be provided to the public,		Training on Accessibility – general Information and	

Implementation Date	General Requirements	Information & Communications	Procurement	Employment	Training
		including responses to any future request under FIPPA, will conform to accessibility standards as set out by the IASR		Communications, job-specific, Employment Standards for Managers	
As of January 1, 2016	Accessibility Compliance Report filed December 2015				
As of January 1, 2017					Email sent in August 2016 to Managers and Employees on the 6 accessibility courses on LearnOn
As of January 1, 2018	Accessibility Compliance Report filed December 2017				
As of January 1, 2019				Management of the development, support and records of accommodation plans assigned to OFAHR	

Implementation Date	General Requirements	Information & Communications	Procurement	Employment	Training
As of January 1, 2020	2019 Accessibility Compliance Report filed		Language regarding vendors' responsibility to comply with requirements under the OHRC, OD and AODA added to RFB/RFS templates		Email sent to Managers and Employees on the 4 accessibility courses available on LearnOn
As of January 1, 2021		All external websites and web content conform to WCAG 2.0 Level AA			Completed internal AODA training audit to ensure compliance of mandatory training requirements

Implementation Date	General Requirements	Information & Communications	Procurement	Employment	Future Workspace	Training
As of January 1, 2022	Accessibility Compliance Report filed December 2021				Prioritization of accessibility in redesign of physical workspace	Email sent to Managers and Employees on any new accessibility courses available on LearnOn
As of January 1, 2023					Accessibility prioritized and integrated into	Email sent to Managers and Employees on

Implementation Date	General Requirements	Information & Communications	Procurement	Employment	Future Workspace	Training
					redesigned workspace completed in November 2022	mandatory training for all new employees
As of January 1, 2026	Accessibility Compliance Report filed December 2025	Accessibility integrated into new public-facing website redesign, launched in September 2026				