	Corporate Policy Manual	
	Document Number:	CPM 12.04
	Document Owner	D. Rodzik
	Effective Date:	07/03/2023
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ACCESSIBILITY PLAN FOR THE NARMCO GROUP OF COMPANIES		

1.0 PURPOSE

1.1 This 2014-22 accessibility plan outlines the policies and actions that the Narmco Group of Companies will put in place, in accordance with legislative requirements, to improve opportunities for people with disabilities. Each individual company will be responsible for implementing and adhering to the plans and policy outlined herein.

2.0 STATEMENT OF COMMITMENT

2.1 The Narmco Group of Companies is committed to ensuring an accessible environment for all persons with disabilities and it is dedicated to meeting the accessibility needs of persons with disabilities in a respectful, equitable and timely manner, consistent with the specific requirements of the Accessibility for Ontarians with Disabilities Act, 2005 and its regulations. In accordance with the Ontario Human Rights Code, we recognize that accommodation must be provided to the point of undue hardship.

3.0 TIMELINE

3.1 This procedure will be implemented in accordance with the staggered time frames established the Accessibility for Ontarians with Disabilities Act, 2005 and its regulations.

4.0 DEFINITIONS

4.1 This policy should be read in conjunction with the Ontarians with Disabilities Act, 2005 and its regulations for the purpose of defining any terms used herein.

5.0 RESPONSIBILITY


5.1 The **Corporate Human Resources Manager** will use best efforts to have the Corporation implement and update this procedure as appropriate.

5.2 Senior Management and Managers will use best efforts:

5.2.1 to ensure that the procedure is communicated to staff and is carried out consistently;

5.2.2 to ensure that feedback regarding the Integrated Accessibility Standards is addressed in accordance with the Plan and Policy

5.1 **Employees** shall comply with the Plan and Policy and are responsible to treat other employees and visitors in a respectful manner consistent with this Policy and our Customer Service standards.

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6.0 ACCESSIBLE EMERGENCY INFORMATION


- 6.1 The Company will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.
- 6.2 Where the employee requires assistance, the Company will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.
- 6.3 The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed, and, when the Corporation reviews its general emergency response policies.
- 6.4 Publicly available emergency information will be provided to customers and clients in an accessible way upon request.

7.0 TRAINING

- 7.1 The Company will provide training to employees, volunteers, and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers, and other staff members.
- 7.2 The Company will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws **by January 1, 2015..**
 - 7.2.1 Training needs for employees and job positions will be assessed.
 - 7.2.2 Training will be developed by Human Resources and Labour Relations Counsel/Consultant. Human Resource Managers for each facility will be trained by the Labour Relations Counsel/Consultant.
 - 7.2.3 Training will be conducted at the facilities by the Human Resource Managers or their trained designates

8.0 INFORMATION AND COMMUNICATIONS

- 8.1 The Company is committed to meeting the communication needs of peoples with disabilities. We will consult with employees and customers with disabilities to determine their information and communication needs are met.
- 8.2 The Company will take the following steps to make all new websites and content on those sites conform to WCAG 2.0, Level A by **January 1, 2014: N/A.**

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8.3 The Company will take the following steps to ensure existing feedback processes are accessible to persons with disabilities upon request by **January 1, 2015**:

8.3.1 Consult, in a timely manner, with the person making the request to arrange for accessibility in a manner which takes into account the person's accommodation needs due to disability.

8.4 The Company will take the following steps to make sure all publicly available information is made accessible upon request by **January 1, 2016**:

8.4.1 The Company will post on their website that publicly available information is available in an accessible format; and

8.4.2 On request will consult, in a timely manner, with the person making the request to arrange for accessibility in a manner which takes into account the person's accommodation needs due to disability.

8.4.3 Note: If we are unable to convert the requested information or communications the Corporation will provide an explanation about why the materials are not convertible and we will provide a summary of the requested information or communications.

8.5 The Company will take the following steps to make all websites and content conform with WCAG 2.0 Level AA by **January 1, 2021**:

8.5.1 Consult with and instruct our web managers to meet the guidelines required in the Act within the timelines provided.

9.0 EMPLOYMENT


9.1 The company is committed to fair and accessible employment practices.

9.2 By **January 1, 2016**, the Company will take the following steps to notify the public and staff that, when requested, the Company will accommodate people with disabilities during the recruitment and assessment processes, when people are hired and during their employment:

9.2.1 Place a notice on the Company website and in job postings to notify potential applicants of the availability of recruitment related accommodations for disability.

9.2.2 Will notify job applicants who have been selected to participate in an assessment or selection process that accommodations are available on request in relation to the materials or processes to be used.

9.2.3 When accommodation is requested, the Corporation will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

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9.2.4 When making offers of employment will notify the successful applicant of its policies for accommodating employees with disabilities.

9.2.5 Inform employees of the Company's policies on employment related accommodation policies, including **Workplace Emergency Response** policies, as soon as practicable after they begin their employment or whenever there is a change to the policies.

9.2.6 Where requested, will consult with an employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job and information generally available to employees in the workplace.

9.3 By **January 1, 2016**, the Company will take the following steps to develop and put in place a process for developing individual accommodation plans and return to work policies for employees that have been absent due to a disability, including the following elements:

9.3.1 The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;

9.3.2 The means by which the employee is assessed on an individual basis;

9.3.3 The manner in which the Company can request an evaluation by an outside medical or other expert, at the Company's expense, to determine if and how accommodation can be achieved;


9.3.4 The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;

9.3.5 The steps taken to protect the privacy of the employee's personal information;

9.3.6 The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;

9.3.7 If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee;

9.3.8 The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

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9.4 The individual accommodation plans will include individualized workplace emergency response information and identify any other accommodation that needs to be provided. If requested, it shall also include any information regarding accessible formats and communications supports.

9.5 **By January 2016**, the Company will take the following steps to ensure that accessibility needs of employees with disabilities are taken into account if the Company is using performance management, career development and redeployment processes by:

9.5.1 Reviewing an individual’s accommodation plan to understand the employee’s accommodation needs and determine whether it needs adjusting to improve his or her performance on the job;

9.5.2 Upon request, have documents related to performance management available in accessible formats;

9.5.3 Provide informal and formal coaching and feedback in a manner that takes into account an employee’s disability;

9.5.4 When providing career development and advancement opportunities or redeployment, review the individual accommodation plans to reflect accommodations required to succeed elsewhere in the organization or to take on new responsibilities in their current position.

9.5.5 In this section, redeployment means the assignment of employees to other departments or jobs as an alternative to layoff

10.0 REVIEW AND REVISIONS

10.1 These policies and programs will be reviewed annually by Corporate Human Resources, in collaboration with Plant and/or Corporate resources and revise as necessary.

E-Revision #	Date	Revision Description
00	01/15	Initial Release
01	08/20	Review
02	08/21	Review
03	08/22	Review
04	07/23	Update to new policy format