



Policy: HR 1.11
Effective: 04.01.25
Revision: 2
Reviewed: refer to HR Forms &
Manual Update Log

Human Resources Policy Manual

Accessibility (Integrated Accessibility Standards)

Policy

- 1.01 Mott Manufacturing Limited (Mott) 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.
- 1.02 Mott is committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and the Integrated Accessibility Standards (Ontario Regulation).
- 1.03 This policy supports breaking down barriers and increasing accessibility for persons with disabilities in the areas of information, communications, employment, and customer service.
- 1.04 The scope of this policy does not include the following: products and product labels, unconvertible information, or information that Mott does not control directly.
- 1.05 This policy is to be reviewed as required, and at least once every 5 years.

Definitions

2.01 Disability

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Procedures

3.01 **GENERAL**

a) Accessibility Plan

Mott will maintain a Multi-Year Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the company's website. Upon request, Mott will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

b) Training Employees

Mott will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training and/or communication on the Human Rights Code as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Mott's policies; and,
- all other persons who provide goods, services or facilities on behalf of the company

The training and/or communication will be appropriate to the duties of the employees, volunteers and other persons. Existing Employees will be notified when changes are made to this policy. New employees will be trained during orientation. Mott will keep a record of the training or communication provided.

c) Questions about this policy

If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by the Human Resources Leader. This individual can be reached by email to hrteam@mott.ca with the subject of "AODA Question" or by phone at (519)752-7825 ext. 240.

3.02 **INFORMATION AND COMMUNICATIONS STANDARDS**

a) Feedback

Mott will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

b) Accessible Formats and Communication Supports

Upon request, Mott will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities in a timely manner that considers the person's accessibility needs due to disability. Examples of accessible formats include but are not limited to large print (font), written communication, reading aloud, use of plain language and transcription of conversation.

Mott will consult with the person making the request in determining the suitability of an accessible format or communication support. If further assistance is required, please inquire with the Human Resources department for additional support.

Mott will also notify the public about the availability of accessible formats and communication supports.

c) Accessible Websites and Web Content

Mott will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

d) Inconvertible Information or Communication

When the information or communication is inconvertible (technically not feasible or technology is not readily available), Mott shall provide the following to the requestor: an explanation of why it is inconvertible and a summary of the inconvertible information or communication.

3.03 **EMPLOYMENT STANDARDS**

a) Recruitment, Assessment and Selection Process

Mott will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. Mott will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, Mott will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

b) Notice to New Hires

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

c) Informing Employees of Supports

Mott will continue to inform its employees of applicable policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

d) Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Mott will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Mott will consult with the employee making the request.

e) Workplace Emergency Response Information

Mott 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 Mott is aware of the need for accommodation due to the employee's disability. Mott will provide this information as soon as practicable after becoming aware of the need for accommodation. Where the employee requires assistance, Mott will, with the consent of the employee, provide the workplace emergency response information to the person designated by Mott to aid the employee.

Mott 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 or as required by HR 2.37 Emergency Response Plan Policy.

f) Documented Individual Accommodation Plans

An employee may request a Documented Individual Accommodation plan by submitting an HR-114 Request for Individual Accommodation (Workplace) Form along with any applicable supporting medical documentation. Employees are responsible for paying any applicable fees charged by the medical professional. Mott will document individual accommodation plans for employees with disabilities in writing using an HR-115 Individual Accommodation Plan (Workplace) Form. The employee or other professionals may be consulted in the development of this plan.

g) Return to Work Process

Mott maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations to return to work. Please see further information in HR 4.09 Short-term Disability Policy. The return to work process outlines the steps Mott will take to facilitate the return to work and will include documented individual accommodation plans as part of the process. This return to work process will not replace or override any other return to work process created by or under any other statute (ie. the *Workplace Safety Insurance Act, as amended*). Employees are responsible for paying any applicable fees charged by the medical professional.

h) Performance Management, Career Development and Advancement & Redeployment

Mott will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

3.04 CUSTOMER SERVICE STANDARDS

Please refer to PM-005 Accessible Customer Service Policy and related forms.

References

- 3.01 Accessibility for Ontarians with Disabilities Act, as amended
- 3.02 HR-050 Visitor Log
- 3.03 HR-105 Visitor Safety Information
- 3.04 HR-114 Request for Individual Accommodation (Workplace) form
- 3.05 HR-115 Individual Accommodation Plan (Workplace) form
- 3.06 HR 2.17 Emergency Medical & Claims Management Procedures
- 3.07 HR 2.19 Early & Safe Return to Work Program
- 3.08 HR 2.37 Emergency Response Plan Policy
- 3.09 HR 4.09 Short-term Disability Policy
- 3.10 Integrated Accessibility Standards, Ontario Regulation 191/11
- 3.11 PM-005 Accessible Customer Service Policy
- 3.12 Multi-Year Accessibility Plan
- 3.13 PM-005 Accessible Customer Service Policy and related forms
- 3.14 Web Content Accessibility Guidelines (WCAG) 2.0
- 3.15 Workplace Safety and Insurance Act, 1997

Revision History

- 12.01.13 Original Release
- 01.01.21 Revision 1. Many sections updated to ensure current compliance with the relevant legislation. Reference section expanded. This policy must be reviewed every 5 years as a minimum.
- 04.01.25 Revision 2. Clarification that employees are responsible for any applicable medical fees. Updated references and HR contact information for AODA inquiries.