

SLEEGERS Engineered Products Inc.

Integrated Accessibility Standards Regulation - Multi-Year Accessibility Plan

Introduction

In 2005, the Ontario Government enacted the Accessibility for Ontarians with Disabilities Act (AODA) which requires that Ontario be an accessible province by 2025.

The subsequent Customer Service Accessibility Act, Ontario Regulation 429/07 and Customer Service Standard, came into force on January 1, 2008. The next three accessibility standards - Information and Communications; Employment; Transportation fall under one regulation, the Integrated Accessibility Standards, Ontario Regulation 191/11 (IASR). The Accessibility Standard for the Design of Public Spaces is also part of the Integrated Accessibility Standards Regulation. The IASR regulation is now law and the requirements currently in regulation are being phased in between 2011 and 2012.

The Multi-Year Accessibility Plan outlines SLEEGERS Engineered Products Inc.'s (SEPI) compliance with the AODA, sets out SLEEGERS's upcoming obligations pursuant to the AODA, and identifies how SLEEGERS has met current obligations, as well as how we will meet future obligations.

Statement of Commitment

We are committed to providing a barrier-free environment for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations.

Our group of companies understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organization changes occur, or in anticipation of deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

For more detailed information on our accessibility policies, plans, and training programs, please contact Human Resources as outlined below.

For more information

Contact: Human Resources
Phone: (519) 266-3176
Email: info@sleegers.ca

SLEEGERS Engineered Products Inc.

Integrated Accessibility Standards Regulation - Multi-Year Accessibility Plan

Deadline	Act Section and Description	Action	Responsibility	Status
JAN 1, 2012	Part 2 - Information and Communications Standard			
	(s.13): Emergency Procedures, Plans or Public Safety Information			
	<ul style="list-style-type: none"> • Where provided, make emergency and public safety information available in an accessible format or with appropriate supports, upon request • Evacuation (this may include information about incidents that threaten life, property, operations or the environment) 	<ul style="list-style-type: none"> • Not Applicable 	Health & Safety	Completed
	Part 3 - Employment Standards			
(s.27): Workplace Emergency Response Information				
<ul style="list-style-type: none"> • Provide individualized workplace emergency response information to employees who have a disability • If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, employer provides the workplace emergency response information to the person designated by the employer to provide assistance to the employee • Review the individualized workplace emergency response information when: <ul style="list-style-type: none"> ○ the employee relocates ○ the employee's overall accommodations needs or plans are reviewed • When employer reviews its general emergency response policies 	<ul style="list-style-type: none"> • Emergency procedures communicated to all employees and updated as required • Emergency Evacuation Map posted • Key personnel trained • Requirement to provide individualized workplace information to employees who have a disability communicated to all employees in IASR Employment Policy • Materials will be made available in accessible formats upon request and updated as required 	Health & Safety Human Resources	Ongoing	

SLEEGERS Engineered Products Inc.

Integrated Accessibility Standards Regulation - Multi-Year Accessibility Plan

Deadline	Act Section and Description	Action	Responsibility	Status
JAN 1, 2014	Part 1 - General Requirements			
	(s.3) - Establishment of Accessibility Policies			
	<ul style="list-style-type: none"> Develop, implement and maintain policies on how SLEEGERS achieves or will achieve accessibility Make the documents publicly available, and provide in an accessible format upon request File an accessibility report every 3 years beginning in 2014 	<ul style="list-style-type: none"> Develop Accessibility Policies and Statement of Commitment Develop strategy to communicate policies AODA - Statement of Commitment to Accessibility posted Policy Statement and Statement of Commitment posted as follows: <ul style="list-style-type: none"> Bulletin Board and tablet – Production Warehouse Bulletin Board - Office lunch room FileHold – Document Management System 	Human Resources	Completed Filed 2014 Next Filing: 2017
	(s.4) - Accessibility Plans			
	<ul style="list-style-type: none"> Create a multi-year plan Review at least once every 5 years Post plan on website Provide plan in an alternate format upon request 	<ul style="list-style-type: none"> Develop a multi-year accessibility plan to address the requirements to be met between 2014 and 2021 Make publicly available - Website; FileHold Available upon request 	Human Resources	Completed Next Review: 2019
	(s.6) - Self-Service Kiosks			
	<ul style="list-style-type: none"> Defined as interactive electronic terminal, point of sale devices Incorporate accessibility features for the kiosks 	<ul style="list-style-type: none"> Consider the needs of people with disabilities when designing, procuring and acquiring self-service kiosks Possible software enhancement i.e. audio and video files when scoping new enhancements Ensure that accessibility features will be considered when scoping upgrades or enhancements 	Business Development	Ongoing <ul style="list-style-type: none"> Developed a reference document pertaining to considerations for disabled users
Part 2 - Information and Communications Standard				
(s.14): Accessible Websites and Web Content				
<ul style="list-style-type: none"> New internet websites and web content must conform with WCAG 2.0 Level A 	<ul style="list-style-type: none"> SLEEGERS will ensure all new websites and web content conform to guidelines 	Web Designer	Ongoing	

SLEEGERS Engineered Products Inc.

Integrated Accessibility Standards Regulation - Multi-Year Accessibility Plan

Deadline	Act Section and Description	Action	Responsibility	Status
JAN 1, 2015	Part 1 - General Requirements			
	(s.7) - Training			
	<ul style="list-style-type: none"> • Training provided to all employees, volunteers, contractors • Topic: IASR and Human Rights Code pertaining to persons with disabilities • Must keep a record of the dates when the training was offered and number of participants trained 	<ul style="list-style-type: none"> • All employees, volunteers and other persons will be trained • Training will be appropriate to the duties of the employees, volunteers and other persons • Training can be provided through: <ul style="list-style-type: none"> i) separate training programs; ii) new hire process; iii) orientation session and may be delivered in different formats e.g. handouts; PowerPoint presentations, online training modules • Training will be provided on an ongoing basis • Record will be kept to ensure compliance 	Human Resources	Ongoing
	Part 2 - Information and Communications Standard			
(s.11): Feedback				
<ul style="list-style-type: none"> • Process for receiving and responding to feedback to ensure that the processes are accessible or arrange for accessible formats upon request 	<ul style="list-style-type: none"> • SLEEGERS will review process for receiving: <ul style="list-style-type: none"> ○ Feedback from public ○ Feedback from employees - in person, by telephone, by email ○ Feedback from customers - in person, by telephone, by writing or via email 	Business Development Human Resources	Ongoing	

SLEEGERS Engineered Products Inc.

Integrated Accessibility Standards Regulation - Multi-Year Accessibility Plan

Deadline	Act Section and Description	Action	Responsibility	Status
JAN 1, 2016	Part 3 - Employment Standards			
	(s.23): Recruitment - Assessment or Selection Process			
	<ul style="list-style-type: none"> Notify applicants when selected to participate in an assessment or selection process that accommodations are available upon request in relation to materials or processes to be used If request is submitted, employer to consult with applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's needs due to a disability 	<ul style="list-style-type: none"> Employment systems and processes under review to ensure accessibility Candidates will be notified of accommodation, support and accessibility on the job posting and on the SLEEGERS website 	Human Resources	Ongoing
	(s.24): Notice to Successful Applicant			
	<ul style="list-style-type: none"> Notify successful applicant of the company's policies for accommodating employees with disabilities 	<ul style="list-style-type: none"> Incorporate in hiring documentation a statement advising that SLEEGERS is committed to providing a barrier-free environment for our current employees and prospective employees Hiring package to include copies of SLEEGERS AODA and IASR related policies 	Human Resources	Completed
	(s.25): Informing Employees of Supports			
	<ul style="list-style-type: none"> Organization to inform employees of its policies used to support its employees with disabilities including provision of job accommodation Needs to be communicated to new employees as soon as practical upon hire Update all employees if there is a change to the related policies 	<ul style="list-style-type: none"> SLEEGERS will provide new employees with copies of Information and Communications Policy and Employment Policy; also available in FileHold Ongoing education and guidance provided to employees to maintain awareness of policies, legislation, as well as supports and facilities available Updated information will be communicated as necessary to employees 	Human Resources	Ongoing
(s.26): Accessible Formats and Communication Supports for Employees				
<ul style="list-style-type: none"> Employer to consult with employee requesting the accommodation for the following: <ul style="list-style-type: none"> Information that is needed in order to perform job Information that is generally available to employees Employer to consult with employee on suitable format/support 	<ul style="list-style-type: none"> Review and update current Policies and Procedures for the provision of job accommodations 	Human Resources Operations Terminal Coordinators	Ongoing	

SLEEGERS Engineered Products Inc.

Integrated Accessibility Standards Regulation - Multi-Year Accessibility Plan

Deadline	Act Section and Description	Action	Responsibility	Status
JAN 1, 2016	Part 3 - Employment Standards			
	(s.28): Documented Individual Accommodation Plans (IAP)			
	<ul style="list-style-type: none"> • Have a written process for the development of documented individual accommodation plans for employees with disabilities. Needs to include the following: <ol style="list-style-type: none"> a) The manner in which an employee requesting accommodation can participate in the development of the IAP b) Employee is assessed on an individual basis c) Employer can request an evaluation by an outside medical or other expert at the employer's expense d) Steps need to be taken to protect the privacy of the employee's personal information e) Frequency with which the IAP will be reviewed and updated f) If an IAP is denied, the manner in which the reasons for the denial will be provided to the employee g) Means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs • If requested, IAP to include any information regarding accessible forms and communication supports provided, and if required, include individualized workplace emergency response information. It shall also include any other accommodations to be provided 	<ul style="list-style-type: none"> • SLEEGERS will review its existing accommodation process • Will identify elements of AODA requirements that need to be incorporated into existing accommodation process • On a case-by-case basis, will develop a written process for IAP • Will communicate obligation to all employees through the distribution of SLEEGERS Employment Policy 	Human Resources	Ongoing

SLEEGERS Engineered Products Inc.

Integrated Accessibility Standards Regulation - Multi-Year Accessibility Plan

Deadline	Act Section and Description	Action	Responsibility	Status
	Part 3 - Employment Standards			
	(s.29): Return to Work Process			
	<ul style="list-style-type: none"> Develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work Document the process to outline steps the employer and employee will take to facilitate the return Use the individual accommodation plans as part of the process 	<ul style="list-style-type: none"> Early & Safe Return to Work Policy and procedures will be updated to comply with AODA regulation IAP will be incorporated into RTW process on a case-by-case basis RTW process will be communicated to all employees 	Human Resources	Ongoing
	(s.30): Career Development and Advancement			
JAN 1, 2016	<ul style="list-style-type: none"> Take into account the accessibility needs of its employees with disabilities when providing career development and advancement to employees with disabilities <ul style="list-style-type: none"> i.e. providing additional responsibilities, movement from one job to another at a higher pay band or level in the organization 	<ul style="list-style-type: none"> Review existing processes and revise as necessary to incorporate AODA requirements 	Human Resources	Ongoing
	(s.32): Redeployment			
	<ul style="list-style-type: none"> Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when deploying employees with disabilities 	<ul style="list-style-type: none"> Review redeployment processes for possible barriers and revise as necessary to incorporate AODA requirements 	Human Resources	Ongoing
	Part 4 - Design of Public Spaces			
JAN 1, 2018	<ul style="list-style-type: none"> Incorporate accessibility requirements under the Accessibility Standard for the Design of Public Spaces Additional barriers identified 	<ul style="list-style-type: none"> Review existing processes and revise as necessary to incorporate AODA requirements 	Facilities	
	Part 2 - Information and Communications Standard			
	(s.14): Accessible Websites and Web Content			
JAN 1, 2021	<ul style="list-style-type: none"> All Internet websites and web content must conform with WCAG 2.0 Level AA, other than <ul style="list-style-type: none"> success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded) 	<ul style="list-style-type: none"> SLEEGERS will ensure all websites and content conform to guidelines 	Web Designer	