



Human Resources Policy			
Section:	400 – Employee Relations	Policy #	HRP-400-1
Policy Name:	Accessibility Policy	Effective:	Jan 1, 2017
Created by:	Jacqueline Charabin	Supersedes:	Jan 1, 2018
Approved by:	Human Resources Dept.	Revision Date:	Nov 23, 2021

1. PURPOSE

ADJ Industries Inc. (ADJ) 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 doing everything possible in meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility where able and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

2. SCOPE

All ADJ Industries Inc. employees.

3. DEFINITIONS

Accessible means ensuring that all employees are able to access ADJ facilities and perform their job task without barriers and to receive information in a manner that is easily understood and takes into consideration the needs of the employee.

Barrier is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This may include architectural or physical barriers, any information or communications barrier making it difficult for people to receive or send information, an attitudinal barrier, a technological barrier, a policy, or a practice.

Disability means:

- a) 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,
- b) A condition of mental impairment or a developmental disability
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) A mental disorder, addiction, environmental sensitivity or
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*



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f) Disability covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time.

4. INFORMATION AND COMMUNICATIONS STANDARDS

4.01 Accessibility Plan

ADJ will develop, maintain and document an 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 bulletin. Upon request, ADJ will provide a copy of the Accessibility Plan in an accessible format.

4.02 Feedback

ADJ 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.

4.03 Accessible Formats and Communication Supports

Upon request, ADJ will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

ADJ will consult with the person making the request in determining the suitability of an accessible format or communication support.

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

4.04 Accessible Websites and Web Content

As of November 2021 ADJ's website has been designed per the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0. Any comments or feedback on website design can be sent to hr@ADJIndustries.com.

5. EMPLOYMENT STANDARDS

5.01 Recruitment

ADJ will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.



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5.02 Recruitment, Assessment or Selection Process

ADJ 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, ADJ 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.

5.03 Notice to Successful Applicants

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

5.04 Informing Employees of Supports

ADJ will continue to inform its employees of its 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.

5.05 Accessible Formats and Communication Supports for Team Members

Upon the request of an employee with a disability, ADJ 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, ADJ will consult with the employee making the request.

5.06 Workplace Emergency Response Information

ADJ 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 ADJ is aware of the need for accommodation due to the employee's disability. ADJ will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, ADJ will, with the consent of the employee, provide the workplace emergency response information to the person designated by ADJ to provide assistance to the employee.



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ADJ will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee’s overall accommodation needs are reviewed, or when ADJ’s emergency response policies are reviewed.

5.07 Documented Individual Accommodation Plans

ADJ will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

5.08 Return to Work Process

ADJ 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 in order to return to work.

The return to work process outlines the steps ADJ 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 (i.e. *Workplace Safety Insurance Act, 1997*).

5.09 Performance Management, Career Development and Advancement & Redeployment

ADJ will take into account 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.

6. Communication and Training

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

- all its employees and temporary employees;



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

The training will be appropriate to the duties of the employees or other persons.

Employees will be trained when changes are made to the Accessibility Policy. New employees will be trained at orientation.

ADJ will keep a record of the training it provides.

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. 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 Department.